

Seaboard Foods Connected Food System *Code of Conduct*

August 2021

WELCOME



As part of the Seaboard Foods connected food system, our team members have been instrumental in helping us relentlessly seek better ways to produce wholesome pork at every step between our farms and family tables around the world.

We are dedicated to our mission of producing food that ensures the well-being of our animals, the environment, the people who make it all possible and the communities we call home. In this pursuit, we are committed to upholding a strong Code of Conduct. We hold all members of our connected food system – Seaboard Foods, Triumph Foods, Seaboard Triumph Foods and Daily's Premium Meats – to this high standard.

Adherence to the values laid out in the Code of Conduct will help Seaboard Foods and the connected food system conduct our business fairly, ethically and to the spirit and letter of the law.

The enclosed Code of Conduct Summary and the detailed policies included in the appendix, which govern Seaboard Foods and its operations, are meant to assist you in reviewing, developing and updating your policies to ensure a consistent, high standard is met across the Seaboard Foods connected system.

Standardizing our core policies is one piece of a robust and ongoing continuous improvement effort, including annual education and training, internal audits and a commitment to revisit and update the Code of Conduct annually, to ensure we continue to meet and exceed customer and consumer expectations.

We thank you for your participation and your compliance with the Code in the everyday operations of your business.

A handwritten signature in black ink, appearing to read 'P. Brown', with a long horizontal flourish extending to the right.

Peter Brown
President & CEO
Seaboard Foods

CODE OF CONDUCT

At Seaboard Foods, we can't execute our business plans without integrity and respect for others. We ask you to execute your piece of the business as part of the connected food system with attention to every detail, especially the ethical implications of your own and your employees' actions. As a member of our connected food system, your actions can reflect on the integrity of our business and impact the level of trust we've established with our customers and consumers. As such, we ask that you act in accordance with the following Code of Conduct and implement these standards across your business.

Code of Ethics and Business Integrity

Reporting of Violations: If members of the connected food system have knowledge or suspect there is or has been a violation of this Code, they have a responsibility to report it. Members of the connected food system shall not allow any adverse employment action or retaliation against an employee reporting a violation pursuant to this policy.

Ethics and Business Integrity: Members shall exhibit and promote the highest standards of honest and ethical personal and professional conduct and comply with the spirit and letter of all applicable laws and regulations in the course of their conduct on behalf of Seaboard Foods and its connected food system. This includes recording all business and commercial dealings transparently and accurately in the members' books and records to demonstrate compliance with applicable laws, regulations and this Code.



Conflict of Interest and Confidentiality: Members' employees shall conduct their private or non-work interests in a manner that does not interfere with the interests of the connected food system or detract from the ability to perform work-related responsibilities objectively and effectively. Persons should immediately disclose any situations that might appear to be a conflict of interest.

Employee Relations

Grievance Mechanism: Members of the connected food system shall maintain an internal program for handling reports of workplace complaints, including anonymous reports. Employees should feel safe reporting concerns to their management without fear of retaliation.

Employee Discipline: Seaboard Foods recognizes the right of members of the connected food system to take disciplinary or corrective action to improve work performance or deter certain behaviors that it deems inappropriate.

Freedom of Association: Members of the connected food system shall respect the right of employees to associate, form, join or organize or not with any group or organization, pursuant to applicable law. Workers shall not be prohibited from exercising their legal rights.

Recruiting & Staffing: Members of the connected food system shall refrain from contracting or paying an outside, third-party recruiter, staffing firm or entity for the purposes of recruiting their employees or referring applicants without express written consent of an authorized officer or representative of the applicable member of the connected food system.



Human Rights & Animal Care

Wages and Benefits: Employees are paid at or above the applicable legal minimum wage for all hours worked in accordance with applicable state and federal law, including the Equal Pay Act. Seaboard Foods and its connected foods system comply with applicable law in the timing and method of payment of wages.

Working Hours and Rest Days: Members of the connected food system shall ensure that their workers adhere to and understand applicable policies and/or terms established by legally binding collective bargaining agreements as they pertain to working hours (regular and overtime), meal or break periods and rest days (regular and compensatory), and comply with applicable federal and state child labor laws.

Recruitment, Selection and Hiring: The Seaboard Foods connected food system is responsible for validating the identity and employment authorization of all their new employees to ensure only workers who are legally authorized to work in the United States are engaged and employed.

Migrant Worker Members of the connected food system are required to ensure that people seeking employment at their facility are not compelled to work through force, deception, intimidation or coercion, which includes monitoring any third-party which assists them in recruiting.

Anti-Discrimination, Anti-Harassment and Respectful Workplace: All employees shall be treated with fairness, respect and dignity. Discrimination or harassment on the basis of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, veteran status or any other status protected by applicable law will not be tolerated and will be subject to appropriate disciplinary action.

Workplace Safety: Members of the connected food system shall ensure that a healthy and safe workplace is maintained for their employees to prevent accidents and injury arising out of, linked with, or occurring in the course of work or as a result of operations.

Workplace Violence: Seaboard Foods does not tolerate workplace violence. All employees, contractors and visitors are strictly prohibited

from making threats and engaging in any violent acts on and in work premises

Drug-Free Workplace: Members of the connected food system are strictly prohibited from possessing, manufacturing, distributing, storing, consuming, or otherwise using alcohol and illegal drugs, as defined by state or federal laws and regulations, on work premises.

Anti-Human Trafficking: Members of the connected food system are committed to a work environment free from human trafficking, including forced labor, unlawful child labor and commercial sex trafficking. Activities associated with such acts will not be tolerated or condoned.



Animal Care: Members of the connected food system shall uphold Seaboard Foods' comprehensive animal care standards and honor their moral and ethical obligation to raise, transport and process food animals using procedures that take into account the long-term health, welfare and management benefits of the individual animals.

Environment, Food Safety & Quality

Environmental Impact: Business shall be conducted in a manner which embraces sustainability, reduces environmental impact and complies with all applicable environmental laws and regulations.

Food Safety and Quality Assurance: Members will comply with all applicable food safety laws, regulations and quality standards.