

HUMAN RIGHTS POLICY

Smithfield¹ is committed to the protection and advancement of human rights, as enshrined in the Universal Declaration of Human Rights (UDHR) issued by the General Assembly of the United Nations on December 10, 1948. The Smithfield Human Rights Policy is grounded in the Smithfield Code of Business Conduct and Ethics (PDF) (the "Code") and operates in conjunction with the Code. The Code, in conjunction with the Human Rights Policy, sets forth Smithfield's policies and practices relating to conducting our business in an ethical and responsible manner that supports and respects the protection of human rights. It reflects the company's core values and high ethical standards.

As used in this Policy and the Code, the term "Smithfield" means Smithfield Foods, Inc., and all foreign or domestic operations and joint ventures in which Smithfield has a majority interest and/or management responsibility, the terms "employees" or "representatives" mean and include all Smithfield employees, officers and directors, and the term "supervisor" refers to the person to whom an employee reports. Smithfield will communicate this policy to its direct supply chain partners.

The Compliance Committee is responsible for the oversight and implementation of this policy and shall define the company's implementation and monitoring efforts to conform to this policy and advance our commitment to continuous improvement.

1. Equal Opportunity

Smithfield does not discriminate against any employee or applicant for employment because of race, color, national origin, sex, sexual orientation, religion, age, status as a protected veteran, status as an individual with disability, gender identity or any other protected group status or non-job-related characteristic, as directed by law. This applies to recruitment, hiring, training, promotion, disciplinary practices and other terms and conditions of employment. Discrimination against any employee or applicant for employment is a serious violation of equal employment opportunity law and of Smithfield's corporate policies. It is the responsibility of every supervisory employee to ensure that discrimination does not occur and for every employee to report violations to our policy or the law.

Smithfield will take action to ensure that qualified applicants are given equal opportunity to be employed and promoted. All personnel actions and company-sponsored programs shall continue to be administered on a nondiscriminatory basis. Violations of policy will be reviewed and investigated, and appropriate action will be taken based on the facts.

2. Health, Environment and Safety

Smithfield is committed to ensuring the health, safety and well-being of our employees, the people living and working in communities near our facilities and the environment and will provide the human, physical and financial resources necessary to meet this commitment. These resources will be used to enable employees and contractors to work safely and comply with company policies and the law, to prevent pollution and to protect the environment. Our employees are expected to comply fully with company policies and to adhere, at a minimum, to the applicable health, environmental and safety legal

requirements of their host country. Training will be provided to our employees on these company policies and legal requirements.

3. Harassment and Violence

Smithfield is committed to providing our employees with a nondiscriminatory work environment free of any type of harassment per company policy and the law. Supervisory employees must investigate all complaints of harassment, and employees are advised on their responsibility to report violations. The company will take appropriate disciplinary actions for violation of policy or law.

All verbal and physical threats of violent behavior are unacceptable and should be reported, as outlined in the Smithfield Code of Conduct. Every report of violence or threats of violence will be investigated. Employees who engage in violence or threats of violence will be subject to disciplinary action, up to and including termination of employment as well as criminal prosecution.

4. Rights of Employees

Smithfield does not use forced or compulsory labor. Workers are recruited and receive competitive wages and benefit packages. Smithfield will not use child labor and respects the rights of children to be protected from economic exploitation. Smithfield recognizes and respects employees' rights and freedom to choose whether to join or not join third-party organizations or to associate freely and bargain collectively. Where applicable, Smithfield supports the rights of its employees to make these choices through fairly conducted secret ballot elections. Smithfield recognizes that in some countries, workers are not free to organize and join unions, and in such circumstances, the company is open to other forms of worker representation.

5. Implementation

This Human Rights Policy will be implemented by Smithfield through communication and training programs for staff on human rights issues generally, and on the requirements of Smithfield's Human Rights Policy specifically.