



Seaboard Triumph Foods Code of Conduct May 2024

WELCOME



At **Seaboard Triumph Foods**, we are dedicated to our mission; **produce quality pork products, ignite the passion and growth of our team members, help our community thrive, and make our business prosperous. Together we will achieve more by working safely and cultivating an inclusive and empowering environment.**

As a **Seaboard Triumph Foods** employee, you play an important role in helping us produce food that ensures the well-being of our animals, the environment, our team members, and the communities we call home.

To make sure we are staying true to our mission across our entire connected food system – from the farm to the fork – we have committed to upholding a strong Employee Code of Conduct, which has been backed by our parent companies Seaboard Foods and Triumph Foods. Understanding and following our values and the policies in the Code will help **Seaboard Triumph Foods** and our employees conduct business fairly, ethically, and lawfully.

The Employee Code of Conduct is meant to help you understand and follow **Seaboard Triumph Foods'** expectations and values. Each employee has the responsibility to review these policies, ask questions, confirm compliance with the Code annually, and report suspected violations.

Seaboard Triumph Foods is always looking for ways to improve through annual education and training, internal audits, and a commitment to revisit and update the Employee Code of Conduct annually to ensure we continue to meet and exceed customer and consumer expectations and remain a great place to work.

We thank you for your compliance.

A handwritten signature in black ink, appearing to read 'Frank Koekkoek Jr.', written in a cursive style.

Frank Koekkoek Jr.
Vice President & General Manager
Seaboard Triumph Foods

CODE OF CONDUCT

At **Seaboard Triumph Foods (STF)**, we cannot execute our business plans without integrity and respect for others. We ask you to execute your piece of the business with attention to every detail, especially the ethical implications of your actions. As a member of the **STF** team, your actions can reflect on the integrity of our business and impact the level of trust we have 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 work.

Code of Ethics and Business Integrity

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

Ethics and Business Integrity: All members of the **STF** team 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 during their conduct on behalf of **STF**. This includes recording all business and commercial dealings transparently and accurately in company books and records to demonstrate compliance with applicable laws, regulations and this Code.



Conflict of Interest and Confidentiality:

All members of the **STF** team shall conduct their private or non-work interests in a manner that does not interfere with the interests of the company 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: **STF** 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: **STF** maintains the right to take disciplinary or corrective action to improve work performance or deter certain behaviors that it deems inappropriate.

Freedom of Association: **STF** 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: **STF** 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.



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. **STF** complies with applicable law in the timing and method of payment of wages.

Working Hours and Rest Days: **STF** shall ensure that 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: **STF** 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: **STF** is required to ensure that people seeking employment at their facilities 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, Anti-Bullying, and Respectful Workplace:

All employees shall be treated with fairness, respect, and dignity. Bullying of anyone is not allowed at any time. Discrimination or harassment based on 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: All members of the **STF** team 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: **STF** 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: All members of the **STF** team 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: **STF** is 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: All members of the **STF** team shall uphold **STF** comprehensive animal care standards and honor their moral and ethical obligation to raise, transport and process food animals using procedures that consider 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 of the **STF** team will comply with all applicable food safety laws, regulations, and quality standards.

**SEABOARD TRIUMPH FOODS POLICIES
CODE OF CONDUCT**

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REPORTING OF VIOLATIONS POLICY

PURPOSE:

The purpose of this policy is to establish procedures for the reporting of violations of the **Seaboard Triumph Foods (STF)** Code of Conduct.

POLICY:

If anyone has knowledge of or reason to believe there is or has been a violation of this Code, such person should report the matter to one or more of the following:

1. The person's immediate supervisor.
2. The Human Resources Department.
3. Online by visiting stf.ethicspoint.com.
4. By calling **STF's** dedicated toll-free Ethics Point hotline number, 844-676-1536.

Persons submitting complaints or concerns pursuant to this policy may do so anonymously or may request that the person receiving the complaint or concern maintain the anonymity of the complaining person. Any such request to maintain such anonymity shall be respected to the extent possible. Persons reporting suspected violations of this policy may also be entitled to additional rights and protections under state and federal whistleblower laws. Additional information concerning whistleblower rights and procedures shall be described in posters at the workplace.

No Retaliation

No employee making a complaint or submitting a concern pursuant to this policy shall face any adverse employment action or other form of retaliation on account of the making of the complaint or submitting the concern, even if based on the result of the investigation it is determined that the complaint or concern has no merit. The foregoing does not prevent **STF** from taking adverse employment action with respect to any person who has made a complaint in bad faith, engaged in, or participated in any wrongdoing, as appropriate, irrespective of whether such person made a complaint pursuant to this policy.

Consequences for Violations

Violations of the content or spirit of these provisions may lead to disciplinary action up to, and including, termination of employment or separation of any ongoing business relationship with **STF**.

CODE OF ETHICS AND BUSINESS INTEGRITY POLICY

PURPOSE:

The successful operation and reputation of **Seaboard Triumph Foods (STF)** depends upon the professional work performance and the ethical conduct of its directors, officers, employees, agents, partners, and vendors. **STF's** reputation of integrity and excellence requires careful compliance with the spirit and letter of all applicable laws and regulations, as well as a commitment to the highest standards of personal and professional conduct.

POLICY:

Honest and Ethical Conduct

Employees shall exhibit and promote the highest standards of honest and ethical conduct by:

1. Encouraging and rewarding professional integrity thereby eliminating coercion, fear of reprisal, or alienation, which can act as barriers and inhibit responsible and ethical behavior.
2. Avoiding, prohibiting, and eliminating any conflict of interest or appearance of a conflict of interest.
3. Following a process for employees to inform **STF's** senior management of practices which deviate from honest and ethical behavior.
4. Demonstrating their personal support for such policies and procedures.
5. Acting in the best interests of **STF** to preserve **STF's** reputation as a professional company operating with integrity and good character.

Compliance with All Applicable Laws

Employees shall comply with all applicable laws and regulations during their conduct on behalf of **STF**.

Antitrust and Fair Competition

Employees shall not enter into any agreement, understanding or arrangement with any competitor about prices, territorial or geographical restrictions, refusals to sell, allocation of business or collaborative bidding, or engage in any other type of anti-competitive practice in violation of applicable federal and state laws or regulations.

Inside Information

1. Introduction

Employees may come into possession of confidential and highly sensitive information concerning **STF**, its affiliates, customers, suppliers, or other companies with which **STF** has contractual relationships or may be negotiating transactions. This information has a potential for affecting the market price of securities issued by **STF's** affiliated company, **Seaboard Corporation**, or **STF's** customers and other counterparties. Under certain circumstances, federal securities law imposes substantial civil and criminal penalties on persons who improperly obtain, use, or provide material non-public information in connection with a purchase or sale of securities.

2. Material Non-Public Information

The United States federal securities laws and regulations have been held to prohibit the purchase or sale of a security at a time when the person trading in that security possesses material non-public information concerning the issuer of the security, or the market for the security, which has not yet become a matter of general public knowledge and which has been obtained or is being used in breach of a duty to maintain the information in confidence.

"Material non-public information" includes information that is not available to the public at large, which could affect the market price of the security and to which a reasonable investor would attach importance in deciding whether to buy, sell, or retain the security. Examples of information that might be deemed material include the following: annual or quarterly financial results, dividend increases or decreases, the declaration of a stock split or the offering of additional securities, earnings estimates, changes in previously announced earnings estimates, significant expansion or curtailment of operations, a significant increase or decline in business, a significant merger or

acquisition proposal or agreement, unusual borrowings or securities offerings, major litigation, impending bankruptcy or financial liquidity problems, significant changes in management, purchases or sales of substantial assets, or the gain or loss of a substantial customer or supplier. This list is not exhaustive. Other types of information may be material at any time, depending upon the circumstances. Both positive and adverse information may be material.

Information is available to the public only when it has been released to the public through appropriate channels (e.g., by means of a press release or a statement from one of **STF's** senior officers) and enough time has elapsed to permit the investment market to absorb and evaluate the information. Once a public release has occurred, information will normally be regarded as absorbed and evaluated within two or three days thereafter.

3. **Policy**

As long as an individual has material non-public information relating to **STF** or any other issuer, including any of **STF's** customers and counterparties, it is **STF's** policy that the individual may not directly or indirectly buy or sell the securities of **Seaboard Corporation** or any other affected customer or counterparty. Equally important, the information may not be passed along to others. This policy shall apply to all officers, directors, and employees of **STF** and its subsidiaries and affiliates and their respective employees.

To avoid potential liability under this policy, all officers, directors, and employees of **STF**, as well as all other employees shall not purchase or sell securities of **Seaboard Corporation** or a customer or counterparty at a time when that individual is aware of or in possession of any material non-public information about **STF** or the customer or counterparty, regardless of how that information was obtained. That individual must not permit any member of his or her immediate family or anyone acting on his or her behalf, or anyone to whom he or she has disclosed the information, to purchase or sell such securities.

After the information has been publicly disclosed through appropriate channels, a reasonable time should be allowed to elapse (at least three business days) before trading in the security, to allow for public dissemination and evaluation of the information.

Without limiting the generality of the policy stated herein, no employee may make any purchase or sale of securities of **Seaboard Corporation** (i) from the 25th day of the last month of each fiscal quarter until the beginning of the third business day after the public release of earnings for such quarter; (ii) from the time of the public release of any material information until the beginning of the third business day after such release; (iii) during any period when he or she is aware that **Seaboard Corporation** or **STF** expects to make a public release of material information in the near future; and (iv) during any other period when he or she has knowledge of any "material inside information" concerning **STF**.

4. **Application of Policy to Family Members and Affiliates**

The foregoing requirements also apply to any purchase or sale of securities of **Seaboard Corporation** by a family member or others sharing the same address or by a corporation, partnership, trust, or other entity owned or controlled by an employee.

Anti-Corruption

All directors, officers, and employees are prohibited from offering, promising, making, authorizing or providing, either directly or indirectly through third parties, any payments, gifts, or the transfer of "anything of value" to any government official in any jurisdiction, with the intention of: (i) Influencing or rewarding any action, inaction or decision by such government official in their official capacity for **STF's** benefit; or (ii) Inducing such government official to use such official's influence to affect or influence any action, inaction or decision of any government authority, agency or instrumentality, government owned business, public international organization, or political party (as the case may be), for **STF's** benefit; or securing any improper advantage for **STF**.

1. **"Anything of Value"**

Cash payments to bribe a government official, as well as a transfer of anything of value — whether tangible or intangible — may be considered an improper payment under this policy if

made corruptly (unless constituting a facilitating payment, as discussed below), including the following:

- > Loans.
- > Gifts.
- > Expenses for travel, meals, lodging or entertainment.
- > Political contributions to any government official in exchange for political favors.
- > The promise of future employment for any government official.
- > Contracts or other business opportunities awarded to a company in which a relevant government official holds a beneficial interest.

The above list is illustrative and is not exhaustive of the types of payments that may be prohibited under this policy.

The mere offer of an improper payment, or the promise of an improper payment, is prohibited by this policy, regardless of whether the offer is ever accepted, or the payment ever made. In other words, at the moment an employee makes the offer or promise of improper payment, they have violated this policy and they personally, along with **STF**, can be prosecuted.

Neither **STF's** funds nor funds from any other source, including personal funds, may be used to make a prohibited payment on behalf of, or for the benefit of, **STF**.

2. **Facilitating Payments**

The Foreign Corrupt Practices Act ("FCPA") and this policy provides a narrow exception for "facilitating or expediting payments" made in furtherance of a routine governmental action that involves non-discretionary acts. For example, obtaining routinely issued permits, licenses, or other official documents, expediting lawful customs clearances, obtaining entry or exit visas, obtaining security through police or military protection, mail pick-up and delivery, providing phone service and performing actions that are wholly unconnected to the award of new business or the continuation of prior business or provide a commercial advantage, could all be "routine governmental action." Routine governmental action does not mean a decision by a foreign official to award new business or to continue business with a particular party (e.g., to obtain a discretionary license or be granted a concession or to renew a license, permit, or a lease). Thus, paying an official a small amount to have the power turned on at a facility might be a facilitating payment; paying a customs inspector to ignore the fact that **STF** does not have a valid license to import products into a certain country would not be a facilitating payment. Whether a payment falls within the exception is not dependent on the size of the payment, though size can be relevant, as a large payment is more suggestive of corrupt intent to influence a non-routine governmental action. If a facilitating payment is made, it must be recorded in the books and records of **STF** in reasonable detail and must accurately and fairly record the payment.

Although true facilitating payments are not illegal under the FCPA, they may still violate local law in the countries where **STF** is operating. In addition, other countries' foreign bribery laws, such as the United Kingdom's Bribery Act, do not contain an exception for facilitating payments.

Any questions or concerns about whether a payment may or may not be considered a facilitation payment should be directed to the Human Resources Department at hr@stfmail.com.

3. **Improper Influence; Corrupt Intent**

As described above, prohibited payments are those made, directly or indirectly, to any government official, with the intention of (i) influencing or rewarding any action, inaction or decision by a government official in their official capacity for **STF's** benefit, (ii) inducing a government official to use such person's influence to affect or influence any action, inaction or decision of any government authority, agency or instrumentality, government owned business, public international organization, or political party (as the case may be), for **STF's** benefit, or (iii) securing any improper advantage for **STF**.

In order to violate this policy, the relevant payment or offered payment must be made with corrupt intent. Corrupt intent is interpreted broadly—all that is required to satisfy this element is for the

relevant payor or offeror to intend to induce the recipient to misuse his or her position for **STF's** benefit. Note that this does not require that the corrupt intent actually succeed in its action or realize its purpose (i.e., that the government official actually takes a given action or is otherwise actually influenced as a result of the payment or offered payment)—only that the payor or offeror intended such a result.

In addition, to violate this policy, the payor or offeror must have knowledge that his or her conduct is unlawful or otherwise prohibited. Knowledge is also interpreted broadly. It does not require that such party specifically be aware of the terms of this policy or that his or her conduct violated the terms of this policy. Rather, all that is required to establish this element is for such party to act with a bad purpose, i.e., to know generally that his or her conduct is unlawful or prohibited. Furthermore, the knowledge element would also be satisfied if a party should be aware of, or consciously disregards, circumstances that should reasonably alert it to a high probability of improper or unlawful payments. A party cannot turn a blind eye to suspicious activity, nor can they purposely not train their personnel in this policy as a defense to counter the knowledge requirement.

4. Indirect Payments

Payments that are prohibited under this policy from being made directly to a government official are also prohibited from being made indirectly to such government official through a third party. Thus, employees cannot pay a third party if they know or should know that any portion of the payment is reasonably likely to be passed on to any government official.

5. Emergency Health and Safety Payments

This policy does not prohibit payments made to avoid a risk to an individual's health or safety; provided, the payment must be fully and correctly recorded in the books and records of **STF** so that there is the ability to timely show the amount of all payments made during a given time period, the purpose, to whom paid and their proper accounting classification.

6. Procedures for Dealing with Third Parties

Payments by **STF** or its employees to consultants, contractors, advisors (including certain financial advisors, legal advisors and accountants), partners (including joint venture partners), agents and other representatives and intermediaries of **STF** (collectively, "Third Parties") who in turn make payments to government officials to secure business or some business advantage for **STF** may violate the FCPA and subject **STF** and themselves to liability and/or reputational harm.

Consequently, no Third Party who will interface with government officials on **STF's** behalf should be retained, unless and until appropriate due diligence has been conducted with respect to the business and reputation of the Third Party, including its FCPA policies, practices, and compliance.

The appropriateness and extent of the due diligence will vary depending on the totality of the circumstances. For example, more careful due diligence may be required for Third Parties that (i) are not well known or not subject to rigorous regulatory oversight, or (ii) are located in a country that has a reputation for widespread government corruption (e.g., jurisdictions that score low on various "corruption perception" indices such as the corruption index published by Transparency International at transparency.org). Please consult the Human Resources Department (hr@stfmail.com) as to whether and what extent due diligence is warranted for a particular engagement.

7. Documentation and Records

All payments made by **STF** or its employees to or for the benefit of any government official (including cash payments, gifts, payment of meal, travel, lodging or entertainment expenses, charitable contributions, political contributions, or otherwise) must be accurately documented in reasonable detail and reported in **STF's** books, records and accounting systems.

Maintenance of Accurate Books & Records

STF, its affiliates and its respective directors, officers and employees shall maintain accurate and detailed books, records, and accounts that are maintained in a manner and for a period of time consistent with all applicable legal and regulatory requirements, utilizing generally accepted accounting principles, to demonstrate compliance with applicable laws, regulations and this Code.

Office of Foreign Asset Control (OFAC) Policy

It is the policy of **STF** and its affiliates to comply with the laws of the United States, which includes rules and regulations of the Office of Foreign Asset Control, a division of the U.S. Treasury (“OFAC”). OFAC was created to enforce trade sanctions and achieve national security goals of the United States against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States. The OFAC regulations prohibit U.S. entities and their foreign branches, U.S. citizens, and any person regardless of citizenship located in the United States, from engaging in or facilitating transactions or making monetary transfers to certain designated countries and designated entities and persons listed on the OFAC list of Specially Designated Nationals and Block Entities (“OFAC SDN List”). The list includes numerous vessels listed by name and chartering or placing cargo on such vessels is also forbidden.

Before engaging in or facilitating any foreign transaction or making any monetary transfer, the individual responsible for the transaction shall engage the **STF** Credit Department (for sales transactions) or the Accounts Payable Department (for procurement/purchasing transactions) to facilitate a review of the OFAC SDN List utilizing a web based searchable database to ensure that the counterparty or counterparties to a transaction are not on the OFAC SDN List.

In the event of the discovery of any violation of this policy, the violation should be promptly reported to the Human Resources Department (hr@stfmail.com) or through the **STF** Ethics Point hotline online at stf.ethicspoint.com or by phone at the toll-free telephone number 844-676-1536.

All applicable records of OFAC compliance, violations and audit work papers will be retained according to OFAC guidelines (5 years).

CONFLICT OF INTEREST AND CONFIDENTIALITY POLICY

PURPOSE:

Seaboard Triumph Foods (STF) requires directors, officers, and employees to conduct their non-work activities in a manner that does not conflict with the interests of **STF** or detract from the performance of their work-related responsibilities. Directors, officers, and employees shall follow the policy set forth below. The failure of any employee to adhere to this policy may result in discipline, including termination of employment.

POLICY:

Conflicts of Interest:

1. No director, officer, or employee of **STF** shall have, directly or indirectly, any financial or other interest in any entity that does business with **STF**. The foregoing shall not prohibit the ownership of not more than two percent (2%) of the stock of any entity that does business with **STF** which is listed upon a national stock exchange or actively traded in the over-the-counter market.
2. Directors, officers, and employees shall not be employed by another entity or individual, participate in self-employment, or serve another entity in any manner where such activity will require an excessive amount of time or materially interferes with the officer's or employee's ability to perform his or her job function on behalf of **STF**. Directors, officers, and employees whose job functions involve interaction with entities or individuals with whom **STF** does business shall not conduct similar business with such entities or individuals for such director's, officer's or employee's own personal affairs or business, receive any personal financial or other benefits, or take any corporate opportunity of **STF** without first obtaining approval from **STF's** Board of Directors. Directors, officers, and employees should disclose any such actual or potential conflicts of interest to **STF's** Board of Directors, which will determine the appropriate resolution thereof. All directors, officers and employees must recuse themselves from any Board of Directors discussion affecting their personal, business, or professional interests.
3. All directors, officers and employees shall be required to complete a form disclosing: (i) all conflicts of interest which such director, officer or employee has knowledge of, or reasonably expects may arise and (ii) all board of director or officer positions such director, officer or employee holds with trade associations or for-profit organizations. **STF** may require a person with an existing or potential conflict of interest to dispense with such activities or positions. The failure of any person to complete such form disclosing all known existing or potential conflicts of interest or the failure to dispense with conflicts of interest, when requested by **STF**, may result in discipline by **STF**, including termination of employment.
4. Any request for a waiver of any provision of this Conflict-of-Interest Policy must be in writing and addressed to **STF's** Board of Directors. Any waiver of this Conflict-of-Interest Policy must be approved by the Board of Directors.
5. Directors, officers, and employees have a duty to avoid possible conflicts of interest. For example, if a situation arises where an employee's personal interest conflicts with the interests of **STF**, or an employee uses his or her position with **STF** to achieve personal gain, a conflict of interest may exist. Such a conflict of interest may harm the integrity of both **STF** and the employee.
6. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with your supervisor or manager or, if circumstances warrant, the Human Resources Department at hr@stfmail.com. Situations that may present a conflict of interest will be evaluated on a case-by-case basis.

Personal Gain:

1. All the business affairs of **STF** with all parties, including government officials, suppliers, customers, unions, trade associations and competitors, shall always be conducted on an ethical, legal and arm's length basis.
2. Directors, officers, and employees shall not accept payments, gifts, or favorable business arrangements or treatment for the purpose of securing preferential consideration from **STF** or as an inducement to **STF** to enter into any transaction. Examples of such prohibited conduct include taking material gifts, gratuities, favors, loans, guarantees of loans, commissions, excessive entertainment, kickbacks, rebates, and other types of inducements, whether financial or of any other nature.
3. Common business practice permits the offer or acceptance of certain courtesies of nominal value, usually in the form of meals and entertainment, provided objectivity of the parties will not be unduly affected.

Confidential Information:

1. It is vital that employees protect the privacy of **STF** and its affiliates confidential information. "Confidential Information" includes proprietary, technical, business, financial, joint venture and customer information that is not available publicly, and personal employee information that is provided in confidence and stored in **STF's** records and databases. It is the employee's responsibility to know what is considered Confidential Information and to obtain clarification when in doubt. The failure of any employee to adhere to these requirements may result in discipline, including termination of employment and/or legal action by **STF**.
2. Employees must not disclose Confidential Information to any person outside of **STF**, unless authorized to do so. This includes, as prohibited, any disclosure of Confidential Information to family and friends. Where Confidential Information is entrusted to persons outside of **STF**, efforts must be made to ensure the continuing protection and confidentiality of that information via a non-disclosure or confidentiality agreement. Within **STF**, Confidential Information should be disclosed only on a "need to know" basis, and in compliance with any applicable law.
3. Employees must not use Confidential Information for unauthorized purposes. They must also take reasonable care to protect Confidential Information against loss, theft, unauthorized access, alteration, or misuse.
4. Employees leaving **STF** who have had access to **STF's** Confidential Information have a continuing responsibility to protect it and maintain its confidentiality. **STF** expects that employees joining **STF** from other companies will not disclose the Confidential Information of those other prior employers.

GRIEVANCE MECHANISM POLICY

PURPOSE:

Seaboard Triumph Foods (STF) has created an internal program for handling reports of workplace complaints or grievances, including anonymous reports.

POLICY:

Internal procedures for handling reports of workplace grievances for represented employees are negotiated and agreed to with the applicable labor union and are contained in the parties' collective bargaining agreement.

STF has created an Open-Door Policy and employee complaint procedure for non-represented employees that mirror many of the provisions negotiated and applicable to union-represented employees.

Our management team wants to know when employees believe they are being treated unfairly or when a policy is not being administered either properly or consistently. Our management team wants to ensure effective communication with our employees, and they will work to address any potential misunderstanding by maintaining an ongoing dialogue with each employee through this Open-Door Policy.

If an employee has an issue that the employee wishes to bring to management's attention, it should be presented to their immediate manager or supervisor first.

There may be instances when an employee is not satisfied with the results they get from the immediate supervisor. A situation could also arise involving the immediate supervisor or manager. In either of these situations, the complaints may be brought to the immediate supervisor's manager, or the employee may contact his or her Human Resources Manager. Management personnel will endeavor to maintain confidentiality and will attempt to resolve the matter in as short a time as possible.

Employees may also always report any violations of the **STF** Code of Conduct or any company policy through the **STF** Ethics Point hotline online at stf.ethicspoint.com or by phone at the toll-free telephone number 844-676-1536. Consistent with its Reporting of Violations Policy, **STF** does not allow any retaliation against an employee who acts in good faith in reporting any such violation or suspected violation.

EMPLOYEE DISCIPLINE POLICY

PURPOSE:

Seaboard Triumph Foods (STF) has adopted the following policy pertaining to employee discipline.

POLICY:

STF recognizes that situations may occur which require appropriate corrective action leading to improvement of an employee's work performance and/or behavior or, if appropriate, termination of employment.

Where appropriate, disciplinary action will be taken with the intention of correcting performance and/or deterring or correcting behavior. However, **STF** reserves its legal rights to utilize the disciplinary techniques which it believes are appropriate. These may include one or more of the following: written counseling, written warning, written warning with suspension, demotion, or reassignment and/or immediate termination of employment.

STF may apply corrective action individually with the merits of each matter without creating precedents for the treatment of other incidents that may arise in the future.

Represented employees of **STF** are subject to rules and discipline established or permitted under the applicable collective bargaining agreement.

FREEDOM OF ASSOCIATION POLICY

PURPOSE:

Seaboard Triumph Foods (STF) has adopted a freedom of association policy to respect the rights of employees to associate, form, join or organize or not with any group or organization as permitted by and in accordance with federal and state laws.

POLICY:

STF strives to foster safe, inclusive, and respectful workplaces and respects the fundamental rights of our employees, including the freedom to associate (or not associate) and collectively bargain, pursuant to applicable law.

We are committed to maintaining the principles of individual recognition and direct communication with our employees. We believe that open discussion between employees and management is the best method of deciding matters that affect us all.

We are dedicated to continuing our practice of treating our employees fairly and providing good working conditions, competitive wages, and benefits, and above all, the respect that each employee deserves.

We are further committed to resolving your problems and complaints. We encourage you to bring your problems to your supervisor, the Human Resources Department or if preferred, you can contact **STF** ethics hotline online at stf.ethicspoint.com or by phone at the toll-free telephone number 844-676-1536. We cannot guarantee that every complaint will be resolved in your favor, but we do believe in fair treatment and a fair opportunity to speak for yourself.

Working together is the only sure road to building a solid future. We value our ability to work with employees individually and will continue to make this a great place to work.

RECRUITING & STAFFING POLICY

PURPOSE:

Seaboard Triumph Foods (STF) has adopted the following policy pertaining to the use of third party recruiting and staffing firms.

POLICY:

STF will not contract with or pay a fee to any outside third-party recruiter, staffing firm, or other entity to refer applicants or prospective employees for employment with **STF** without specific written authorization of the Vice President, Human Resources.

Third party recruiters, staffing firms, or other entities contracted with or paid a fee to refer applicants or prospective employees for employment with **STF** are required to comply with all applicable labor, employment, and immigration laws and will be subject to third-party audits to verify compliance.

This policy does not preclude **STF** from using or posting openings on electronic job boards, participating in local job fairs, utilizing government agencies, notifying organizations (including veterans, disability, religious, and civic groups) of job openings as part of its affirmative action or other outreach programs, or creating employee referral programs.

WAGES AND BENEFITS POLICY

PURPOSE:

Seaboard Triumph Foods (STF) has adopted policies pertaining to wages and benefits in accordance with applicable federal and state laws.

POLICY:

Wages

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 Federal Equal Pay Act.

STF complies with applicable state law in the timing and method of payment of wages to its employees.

Benefits

STF offers employee benefits pursuant to its policies and in accordance with applicable law, which may include health, life, and disability insurance, paid time off, holidays, leave of absence, and retirement plans, all of which may vary by specific location and are subject to certain eligibility requirements.

WORKING HOURS AND REST DAYS POLICY

PURPOSE:

Seaboard Triumph Foods (STF) has adopted policies pertaining to working hours, rest days and minimum age requirements in accordance with applicable federal and state laws.

POLICY:

Hours of work, overtime, and rest periods for represented employees of **STF** are negotiated and agreed to with applicable labor unions and are included in the parties' collective bargaining agreement.

The work week for payroll purposes starts at 12:00 A.M. on Monday and ends at midnight Sunday evening. Hours of work comply with applicable laws and are scheduled in line with the requirements of the department and employees are notified of changes in work schedules.

STF provides meal/break periods on a daily basis as outlined by operational needs or an applicable collective bargaining agreement. This provides a flexible accommodation to the employees and their work schedule.

STF complies with applicable federal and state child labor laws. **STF** does not employ anyone younger than age 18 its facility and verifies its compliance with this policy through **STF's** employment eligibility verification process in accordance with applicable laws.

RECRUITMENT, SELECTION AND HIRING POLICY

PURPOSE:

Seaboard Triumph Foods (STF) only employs workers who are legally authorized to work in the United States and validates the identity and employment authorization of each new employee (both citizen and noncitizen) hired to work in the United States in accordance with the Immigration and Control Act.

POLICY:

It is the policy of **STF** to provide equal employment opportunity to all persons, consistent with employment requirements and qualifications and to ensure there will be no discrimination because of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, veteran status, or other status protected by applicable law.

STF shall not discriminate against work-authorized individuals in hiring, firing, recruitment, or in the employment eligibility verification (Form I-9 and E-Verify) process based on that individual's citizenship status, immigration status or national origin. In compliance with federal law, **STF** completes Form I-9 to document verification of the identity and employment authorization of each new employee (both citizen and noncitizen) hired after November 6, 1986, to work in the United States. **STF** does not specify which document(s) an employee may present to establish employment authorization and identity but allows the employee to choose the documents to be presented from the government's approved Lists of Acceptable Documents.

STF shall not retain employees' government-issued identification, passports or work permits as a condition of employment.

If an individual believes he or she is being discriminated against for any reason, it is essential that it be immediately reported to his or her supervisor, department manager or to the Human Resources department, so management will be aware of the situation and may conduct an immediate investigation and take appropriate corrective action. Individuals may also report any violations of this or any other company policy through the **STF** Ethics Point hotline online at stf.ethicspoint.com or by phone at the toll-free telephone number 844-676-1536.

MIGRANT WORKER POLICY

PURPOSE:

Seaboard Triumph Foods (STF) is committed to ensuring migrant workers in our operations and supply chains are treated equally, without discrimination and with the utmost dignity and respect for their human rights.

POLICY:

It is the policy of **STF** to ensure migrant workers are employed responsibly, that they are not indebted to agencies or to **STF**, that they receive equal pay for equal work in accordance with applicable law and receive adequate training and that their welfare and rights are safeguarded.

STF shall ensure that migrant workers are not required to pay **STF** or their agents' recruitment fees or other related fees for their recruitment and must not be bonded through other loans or fees to obtain employment. If such fees are found to have been paid by workers, such fees shall be repaid to the workers by **STF**.

STF shall ensure that third-party recruitment agencies are reputable and responsible and that such agencies are compliant with the provisions of this Policy and applicable law. **STF** shall ensure all written contracts with recruitment agencies specify that no fees are to be charged to the recruited workers.

STF shall not retain employees' government-issued identification, passports, travel documents or work permits for any reason, including but not limited to as a condition of employment.

STF shall ensure the terms of employment (e.g., suitable lodging accommodations, work location, pay, etc.) for migrant workers are clearly outlined in a language understood by the migrant worker.

If an individual believes he or she is being discriminated against for any reason, it is essential that it be immediately reported to his or her supervisor, department manager or to the Human Resources department, so management will be aware of the situation and may conduct an immediate investigation and take appropriate corrective action. Individuals may also report any violations of this or any other company policy through the **STF** Ethics Point hotline online at stf.ethicspoint.com or by phone at the toll-free telephone number 844-676-1536.

ANTI-DISCRIMINATION, ANTI-HARASSMENT, ANTI-BULLYING, AND RESPECTFUL WORKPLACE POLICY

PURPOSE:

Seaboard Triumph Foods (STF) has adopted an anti-discrimination, anti-harassment, anti-bullying, and respectful workplace policy to promote and maintain a workplace free from discrimination, harassment, and hostility. Our company goal is that every employee is treated with fairness, dignity, and respect. **STF** prohibits retaliation of any kind against employees covered by this policy, who, in good faith, report harassment and/or discrimination, participate in an investigation, or who otherwise assist in investigating such complaints.

POLICY:

Equal Employment Opportunity Policy

It is the policy of **STF** to provide equal employment opportunity to all persons consistent with employment requirements and qualifications, and to ensure there will be no discrimination because of race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, veteran status, or any other status protected by applicable law.

If an individual believes he or she is being discriminated against for any reason, it is essential that it be immediately reported to his or her supervisor, department manager or to the Human Resources department, so that management will be aware of the situation and may conduct an immediate investigation and take appropriate corrective action. Individuals may also report any violations of this or any other company policy through the **STF** Ethics Point hotline online at stf.ethicspoint.com or by phone at the toll-free telephone number 844-676-1536.

Harassment Prevention Policy

All employees of **STF** are expected to treat others with dignity and respect. Harassment of any form or harassment based on 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.

Sexual advances, requests for sexual favors, and other verbal, written and physical conduct of a sexual nature constitute sexual harassment when (examples are not all inclusive):

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.
2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual.
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Examples of sexual harassment include such things as:

- > Verbal harassment, including sexual remarks and sexually derogatory comments or slurs.
- > Inappropriate or offensive visual harassment, including sexually offensive posters, cartoons, drawings, emails, or any other electronic means, etc.
- > Physical interference with normal work or movement.
- > Unwelcome sexual touching or advances.

Other Forms of Harassment

Harassment based on other factors such as race, color, religion, sex, sexual orientation, gender identity, national origin, age, disability, veteran's status, or any other status protected by applicable law also will not be tolerated.

Respectful Workplace Policy

Disrespectful, bullying, or inappropriate behavior can be any conduct by an individual that adversely affects an employee's psychological or physical well-being. Such behaviors can stem from a series of incidents, or a single incident depending on its severity and are prohibited. These behaviors are comprised of acts that:

- > Are demeaning, belittling or can cause personal humiliation or embarrassment.
- > Are threatening, intimidating and generally produce harmful results such as endangering a person's safety or negatively affecting their work performance or employment relationship.
- > Create a hostile, threatening or coercive work environment.
- > Are offensive or insulting, including comments, jokes, slurs, name calling, gestures, innuendos, threats, or taunting.
- > Include displaying or distributing inappropriate posters, pictures, cartoons, graffiti, drawings, or other visual representations.
- > Include ostracizing or spreading gossip and spiteful rumors about a person or persons.
- > Use coercion or intimidation tactics when managing and monitoring a person's work.
- > Bullying, intimidation, malicious, or insulting behaviors towards another person.

Employment Consequences

Any individual found to have engaged in any prohibited form of harassment or disrespectful behavior, either directly or indirectly, will be subject to appropriate disciplinary action, up to and including termination of employment.

Reporting Procedure

If an individual believes that he or she is being harassed or discriminated against due to any of the above reasons, the incident(s) should be immediately reported to the individual's supervisor, department manager or to the Human Resources department. Individuals may also report any violations of this or any other company policy through the **STF** Ethics Point hotline online at stf.ethicspoint.com or by phone at the toll-free telephone number 844-676-1536.

Employees are urged to use this procedure to report any claims so that management will be aware of the situation and can conduct an immediate investigation and take appropriate corrective action. A timely resolution of each complaint will be reached, and results of the investigation will be communicated in a timely manner, not to exceed 30 business days, to the employee and other concerned parties with a business need to know.

This reporting procedure should also be used to report any violations of this policy, including violations involving agents and supervisory employees of **STF** or its subsidiaries, fellow employees and non-employees, service and supply companies or any other person dealt with in the workplace.

Anyone who reports a violation, concern or grievance shall not have any negative impact or reprisal. A reprisal occurs when a responsible management official takes or threatens to take an unfavorable personnel action or withholds or threatens to withhold a favorable personnel action against a **STF** employee because the employee made or was preparing to report an incident of discrimination or harassment. A personnel action is any action taken against an employee that affects or has the potential to affect that employee's current position or career. Examples would include but not limited to; performance evaluations; transfer or reassignment; changes to duties or responsibilities; disciplinary or other corrective actions; termination; decisions concerning promotions or training; and decisions concerning pay or benefits. **STF** will maintain confidentiality once a report is made, if possible, under the circumstances presented. All participants who take part in an investigation must maintain confidentiality and failure to do so could result in discipline.

WORKPLACE SAFETY POLICY

PURPOSE:

Seaboard Triumph Foods (STF) is committed to protecting the health and safety of our employees, contractors and visitors in our workplace and the facilities we operate.

POLICY:

STF is committed to providing a healthy and safe workplace for all employees, contractors, visitors, and the communities where we operate. Preventing accidents shall be a primary objective in all phases of our operations and administration. **STF** recognizes that a safe work environment can only be established and sustained through a united effort by all employees.

To accomplish this, **STF** pledges to the following:

- > Ensure the primary consideration in all phases of our operations and administration is prevention of accidents.
- > Comply with all applicable OSHA regulations.
- > Commit appropriate and sufficient resources to protect and support company safety efforts.
- > Assure timely and thorough reporting and investigation of all incidents including the identification of root causes and effective corrective actions.
- > Train all employees in safe work practices and procedures.
- > Enforce company safety and health rules and require employees to follow safe work practices as a condition of employment.

Managers, supervisors, and employees share responsibility for a safe and healthy workplace.

- > **MANAGEMENT** is accountable for preventing workplace injuries and illnesses, developing safety policies and procedures, and ensuring compliance with applicable OSHA regulations and standards.
- > **SUPERVISORS** are responsible for supervising and training workers in safe work practices, enforcing company safety rules and ensuring employees adhere to safe work practices.
- > **EMPLOYEES** are expected as a condition of employment to participate in all safety program activities including training, immediately reporting hazards, unsafe work practices/condition and accidents/injuries to supervisors and comply with all company safety policies/procedures.

Together, we will **THINK, COMMUNICATE,** and **WORK TOGETHER SAFELY,** every minute, every hour, and every day.

WORKPLACE VIOLENCE POLICY

PURPOSE:

Seaboard Triumph Foods (STF) is committed to protecting the health and safety of our employees, contractors, visitors, and the communities where we operate and does not tolerate acts of workplace violence committed by or against employees, contractors, or visitors.

POLICY:

STF does not tolerate workplace violence. All employees, contractors and visitors are strictly prohibited from making threats and engaging in any violent acts in and on work premises. Such conduct includes, but is not limited to the following:

- > Injuring or threatening injury to another person.
- > Engaging in behavior that creates a reasonable fear of injury to another person.
- > Illegally possessing, brandishing, or using a weapon while on work premises.
- > Damaging property intentionally.
- > Committing any offensive act motivated by or related to domestic violence or sexual harassment.

Any person who feels threatened by or observes any such act should immediately report the incident to their immediate supervisor, contact the **STF** Ethics Point hotline online at stf.ethicspoint.com or by phone at the toll-free telephone number 844-676-1536 or Human Resources. All such reports will be treated as confidential and will only be disclosed to appropriate federal, state, or local law enforcement authorities as necessary to protect workplace safety and as required by federal and state law.

Consequences for Violations

Any employee who engages in workplace violence will be immediately removed from the work premises and subject to discipline, up to and including termination and may be reported to appropriate law enforcement authorities.

DRUG-FREE WORKPLACE POLICY

PURPOSE:

As part of **Seaboard Triumph Foods' (STF)** commitment to protecting the health and safety of its employees, contractors, visitors, and the communities where we operate, it has established a drug- and alcohol-free environment for all its workplaces.

POLICY:

STF complies with all applicable state and federal laws and regulations regarding drug and alcohol use. Employees 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. Any person who observes a violation of this policy should immediately report the incident to their immediate supervisor. All such reports will be treated as confidential and will only be disclosed to appropriate federal, state, or local law enforcement authorities as necessary to protect workplace safety and as required by federal and state law.

Consequences for Violations

Any employee who violates this policy will be removed from the workplace and will be subject to discipline, up to and including termination, and may be reported to appropriate law enforcement authorities. Employees should also be aware that violations of this policy may be considered to violate other of **STF's** policies as well.

ANTI-HUMAN TRAFFICKING POLICY AND PROGRAM

As part of **Seaboard Triumph Foods' (STF)** Anti-Human Trafficking Compliance Program was developed in accordance with all applicable federal and state laws, including, but not limited to, the Trafficking Victims Protection Act (TVPA) of 2000, Federal Acquisition Regulation 52.222-50 (48 CFR Section 52.222-50) and California's Transparency in Supply Chains Act of 2010. The following program supports **STF's** policy against human trafficking.

Anti-Human Trafficking Policy

STF prohibits all forms of human trafficking or trafficking in persons as defined by federal law in its operations. This includes, but is not limited to, forced labor trafficking and commercial sex trafficking. Workers will not be subject to any form of forced, compulsory, bonded, documented, or indentured labor through any type of physical or psychological coercion. **STF** also supports laws enacted to prevent and punish human trafficking. **STF** is committed to increasing awareness of these issues among its employees and supports the efforts of the government and law enforcement authorities to enforce these laws and regulations.

Scope

This Anti-Human Trafficking Compliance Policy applies to all **STF** employees as well as agents acting on behalf of the company, including its contractors and subcontractors. It also sets forth procedures for **STF** to require compliance by suppliers and vendors based on an evaluation of the risk of human trafficking and slavery in its supply chain.

Expectations

STF expects all persons and entities to whom this Policy applies to:

- > Understand and comply with this Policy and all applicable Anti-Human Trafficking laws.
- > Complete training on this Policy upon onboarding.
- > Attend periodic training sessions relating to this Policy if employed within executive management, procurement, human resources, and/or recruiting.
- > Report any possible violations regarding this Policy or any applicable anti-human trafficking laws through any of the resources available at **STF**, as described by the reporting section of this Policy.
- > Cooperate fully with any trafficking-related audits and investigations.

US Government's Anti-Trafficking Policy

The United States Government has a zero-tolerance policy against trafficking in persons and **STF** supports the government's position. The anti-human trafficking clause of the Federal Acquisition Regulation (FAR) as applicable to **STF** applies to government contractors, contractor employees, subcontractors, subcontractor employees, and their agents, and prohibits:

- > Engaging in severe forms of trafficking in persons during the performance of a government contract.
- > Procuring commercial sex acts during the performance of the contract.
- > Using forced labor in the performance of the contract.
- > Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- > Using misleading or fraudulent practices during the recruitment of employees or offering of employment or using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- > Charging recruitment fees to employees.

- > Failing to provide return transportation or pay for the cost of return transportation upon the end of employment in certain situations for employees hired for the purpose of working on a government contract.
- > Providing or arranging housing that fails to meet the host country housing and safety standards.
- > If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing in a language the employee understands (if the employee must relocate to perform the work, the work document must be provided at least five days before the employee relocates).

Similarly, this policy prohibits these actions and failures by **STF** employees, agents, and subcontractors. Any violation of this policy will result in disciplinary action, up to and including termination of employment.

Monitor and Assess

While this Policy reflects the current risks associated with **STF's** operations, no effective policy can remain static. Accordingly, **STF** will continue to monitor and assess its policy in conjunction with its Anti-Human Trafficking Compliance Program.

Questions

Questions regarding **STF's** policy against human trafficking and forced labor should be directed to the Human Resources department (hr@stfmail.com).

Anti-Human Trafficking Program

Awareness Program

Awareness of **STF's** Anti-Human Trafficking Compliance Program and methods of reporting potential violations are critical to the success of the program. During onboarding with **STF**, new employees are provided copies of **STF's** Anti-Human Trafficking Policy and Program. Copies of the policy and program will be provided in the employee's native and/or preferred language. If an employee indicates that he or she cannot read, the policy and program will be read to the employee with the assistance of an interpreter in his or her native and/or preferred language. The copies of the policy and program provided will include the government's zero-tolerance policy prohibiting trafficking in persons and detail the process for reporting suspected violations of the policy as well as consequences for violating the policy. Each employee is required to certify by signature that he or she has received copies of the policy and program and understand their contents.

Training

All employees who work in the recruiting department, procurement department, human resources, and/or executive management will receive anti-human trafficking training upon onboarding and on a periodic basis thereafter. Records of all anti-human trafficking training received will be maintained for each applicable employee.

Recruitment and Wage Plan

STF hires employees directly whenever possible. At times, however, **STF** uses recruiters to locate production and hourly employees. **STF** only uses recruitment companies with trained employees that comply with the local labor laws of the country in which the recruitment takes place. In instances when **STF** uses a third-party recruiter, the recruiter generally charges **STF** a recruitment fee. **STF** does not seek reimbursement for any portion of that fee from the employee.

All newly hired and promoted employees, regardless of work location, are provided a written description of their employment, in a format and language accessible and understandable to the employee, which includes the terms and conditions of employment, wages and benefits, location of work, a description of time off, a description of any housing arrangements and associated costs, any significant costs to be charged to the employee, and the hazardous nature of the work, if applicable.

All wages meet applicable state minimum wage laws and the Fair Labor Standards Act.

Housing and Return Transportation Plan

STF arranges for temporary housing for production and hourly employees relocating to Sioux City, Iowa from outside the country. All housing options arranged by **STF** meet applicable housing and safety standards. At the end of employment, **STF** may provide return transportation or pay for the cost of return transportation.

Relocation Expenses

STF may seek reimbursement from the employee for relocation expenses, housing, local transportation, and other costs (not to include recruitment fees). In that situation, **STF** will clearly include the method and manner of reimbursement in the employment agreement. Should the reimbursement occur through payroll deduction, that method will be clearly stated in the employment agreement. **STF** will never deduct an amount that will result in the employee's pay dropping below the applicable minimum wage.

Passports and Identification Documents

No **STF** employee or agent shall ever confiscate, conceal, destroy, or deny an employee access to his or her identity, immigration, or travel documents for any purpose. If identification documents are needed by the company to assist an employee with administrative paperwork, the employee will provide a copy of that document in lieu of the original. If original documents are required, the employee will present the documents to the company for review, the company will examine the documents, make a copy of the documents, and return the original documents in the same meeting, all within the presence of the employee.

Suppliers and Vendors

STF will implement procedures based on an evaluation of the risk of human trafficking and slavery in its supply chain to require compliance by its suppliers and vendors with this Policy. Although this Policy is effective immediately, implementation of certain supplier/vendor requirements will take time and will be prioritized based on a risk assessment. These procedures that **STF** will utilize with respect to its suppliers and vendors may include one or more of the following:

1. Inclusion of provisions in purchase orders and contracts representations requiring compliance with applicable laws relating to human trafficking and **STF** Human Trafficking Compliance Policy.
2. Requiring existing suppliers to acknowledge **STF's** expectations as set forth in its Human Trafficking Compliance Policy.
3. Verification measures where appropriate to evaluate and address risks of human trafficking, including possible site visits to ensure compliance with contractual obligations.

Certifications

STF will provide certifications as required by the applicable Federal Acquisition Regulations (FAR) when requested by any federal contractor.

Reporting

STF is committed to providing a safe and easy means of reporting suspected human trafficking activity.

Employees and agents are required to report suspected human trafficking activities and are permitted to do so anonymously through the **STF** Ethics Point website at stf.ethicspoint.com or by phone at the toll-free telephone number 844-676-1536. Employees and agents may also directly contact the Human Resources Department by email at hr@stfmail.com.

All reports of suspected human trafficking activities, from any source, are investigated. When **STF** is serving as a federal contractor, it will report credible information of human trafficking activities to the Contracting officer and the agency Inspector General. Such reports shall include sufficient information to

identify the nature and extent of an offense and the individuals responsible for the conduct. **STF** will take all appropriate action(s) against an employee, subcontractor, or subcontractor employee (or their agents).

Anti-Retaliation

STF strictly prohibits retaliation against employees who report suspected violations of human trafficking laws. Concerns about retaliation should be promptly reported to the employee's supervisor or the Human Resources Department. The complaint will be promptly investigated, and appropriate disciplinary action, up to and including termination, will be taken.

Cooperation

As provided in the applicable FAR Regulations and subject to the conditions set forth therein, **STF** will provide timely and complete responses to Government auditors' and investigators' requests for documents and will cooperate fully in providing reasonable access to **STF** facilities and staff to allow contracting agencies and other responsible Federal agencies to conduct audits and investigations of potential human trafficking violations.

Also, **STF** will protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited. **STF** will not prevent or hinder the ability of these employees from cooperating fully with Government authorities.

Remediation

When violations are found through an internal investigation or third party, **STF** will take appropriate corrective action and preventative measures commensurate with the severity of the violation to prevent risk of reoccurrence.

Posting

STF's Anti-Human Trafficking Policy will be posted at all fixed work locations and on our website at seaboardtriumphfoods.com. If posting the policy at the workplace is impracticable, **STF** will provide the policy to each worker in writing in his/her preferred language.

Online Statement

Under California's Transparency in Supply Chains Act, **STF** will prepare a statement to be posted online at seaboardtriumphfoods.com. This online statement will disclose via this statement what efforts it has made to eradicate human trafficking in its direct supply chain. At a minimum, the statement will disclose to what extent **STF**:

1. Engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery. The disclosure shall specify if the verification was not conducted by a third party.
2. Conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit.
3. Requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.
4. Maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.
5. Provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.

ANIMAL CARE POLICY

PURPOSE:

Seaboard Triumph Foods (STF) has a moral and ethical obligation to care for and treat animals humanely, and is required to raise, transport, and process food animals using procedures that are safe and free from cruelty and neglect while focusing on providing our customers with healthy, safe, great-tasting pork products.

We require employees commit generally to the proper and humane treatment of our animals and to comply with **STF's** comprehensive animal care program. We support animal welfare practices based on sound science and look at all practices from the long-term health, welfare, and management benefits of the individual animals.

POLICY:

STF Animal Care Policy requires **STF** to:

- > Provide nutritionally balanced diets, developed by our nutritionists and access to fresh quality water.
- > Provide a comfortable environment, including shelter and comfortable resting areas.
- > Work to mitigate pain, injury or disease and provide rapid diagnosis and treatment.
- > Provide sufficient space, proper facilities, and interaction with other pigs.

To achieve these foundational animal care practices, the animal care policy includes the following practices/requirements:

- > Veterinary Oversight
- > Herd Health Plan and Biosecurity
- > Animal Care Training
- > Zero Tolerance for Improper Handling (including immediate termination and the right to assist law enforcement in any criminal investigation for accusations of animal abuse or mistreatment)
- > All Hogs Processed from PQA Plus® Farm Sites with PQA Plus® Certified Farm Managers
- > TQA® Certification of All Animal Transporters
- > At least 10% of All Sites Audited by Third-Party Animal Welfare Auditors Annually (unannounced)
- > In-Plant Animal Handling Audits by PACCO-Certified Auditors
- > Minimum 1-hour Rest Period at Plant to Reduce Stress and PSE
- > Plants USDA Process Verified for Animal Handling
- > CO2 Stunning Practices
- > Pain Mitigation Used for Processing Procedures
- > CO2 Euthanasia for Pigs <25 lbs. as a Primary Method

ENVIRONMENTAL IMPACT POLICY

PURPOSE:

Seaboard Triumph Foods (STF) seeks to comply with all applicable environmental laws, regulations and permits and to minimize the environmental impact resulting from its operations.

POLICY:

STF's environmental practices shall comply with all applicable environmental laws, regulations and permits, including those related to air emissions, water use, wastewater management, stormwater protection, solid and hazardous waste disposal, and greenhouse gas reporting.

STF shall:

- > Implement environmental practices that meet or exceed all applicable regulations, laws, regulations and permits.
- > Practice sustainable and responsible resources management, including energy, soil, water, and air quality conservation.
- > Follow processes to identify and have access to environmental laws and regulations.
- > Train employees about relevant environmental laws, regulations, permits and practices.
- > Establish and implement operational control procedures related to environmental practices.
- > Follow procedures for corrective and preventive environmental practices.
- > Develop practices to reduce or repurpose waste.
- > Comply with the environmental requirements of the PQA Plus™ program (hog suppliers).

EMPLOYEE CODE OF CONDUCT ACKNOWLEDGEMENT FORM

By signing below, I acknowledge that I have received a copy of the **Seaboard Triumph Foods** Employee Code of Conduct, dated May 2024. I understand that I am responsible for reading and understanding its contents and am expected to adhere to the Employee Code of Conduct's standards. I also understand that the information, policies, and procedures described in this document may be changed, altered, or modified in whole or in part at any time without advance notice to me.

I understand that failure to comply with this Employee Code of Conduct may result in disciplinary action against me, up to and including termination of my employment.

I understand that this Employee Code of Conduct replaces and supersedes all prior Employee Code of Conduct policies that I have received. I understand that any questions I may have about this Employee Code of Conduct may be directed to **STF** or the Human Resources Department (hr@stfmail.com).

Employee Name/Employee Number

Signature

Date