



DOING WHAT'S RIGHT

Tyson Code of Conduct





LETTER FROM THE CHAIRMAN

As I think about our Company, our team members and the legacy of who we are, I am reminded that our ultimate calling is to treat each other with respect, care, acceptance, understanding and dignity. Every day, our responsibility is to strive to do what is right in our business, our communities, our offices, our plants and with each other.

That's why our Core Values, Customer Promise and Code of Conduct provide such an important bedrock for who we are and who we want to be. They help us fulfill our promise to be forthcoming with truth, integrity and trust. This is how we support each other.

Thank you for your commitment to our Company, our workplace, to each other and to our community. This will help lead us successfully into the future as one of the world's leading food companies.

John Tyson

Chairman, Tyson Foods, Inc.





LETTER FROM THE CEO

Welcome to our Code of Conduct. At Tyson Foods, we're raising the world's expectations for how much good food can do – and that starts with our team members. It's a privilege to be part of a company where we're encouraged to be honest, voice our concerns, and operate with integrity.

Our business is at its best when we hold each other accountable. We all have a responsibility not only to adhere to the Code of Conduct but to reach out to management, human resources, ethics & compliance or call our [Ethics Line](#) when we are faced with situations where the Code is not being upheld.

Please take this opportunity to review our expectations of each other and our company. Since no single document can address every possible business situation, I also encourage you to refer back to the Code if you have questions or are faced with an unfamiliar situation.

Thank you for all you do for Tyson Foods – and for doing it with integrity.

A handwritten signature in black ink, appearing to read 'Donnie King'.

Donnie King

President & CEO, Tyson Foods, Inc.





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TYSON CODE OF CONDUCT

Tyson team members and Directors will demonstrate commitment to Tyson's core values by operating with integrity and applying high ethical standards, including by:

- ▶ Not engaging in any activity that might create a conflict of interest for any team member, Director or the Company.
- ▶ Not taking advantage of their position in order to seek personal gain.
- ▶ Observing fair dealing in all transactions and interactions.
- ▶ Protecting all company assets and using them only for appropriate company approved activities.
- ▶ Complying with the Code of Conduct, all applicable processes, policies, laws, rules and regulations.

Every team member and Director has the responsibility to ask questions and seek guidance. Team members and Directors are required to promptly report any known or suspected violation of Tyson's Code of Conduct, laws or unethical conduct. Team members can contact their supervisor, a member of management, an HR representative, the Ethics Line, [telltysonfirst.com](https://www.telltysonfirst.com) or directly email the Ethics & Compliance Department at ethics@tyson. Retaliation against anyone who comes forward to raise genuine concerns will not be tolerated.



INTRODUCTION



“From the beginning, our company has been built on faith, family, and hard work. That tradition, our core values, and ‘doing what’s right’ are deeply embedded in our culture.”

– JOHN TYSON, CHAIRMAN



CORE VALUES:

WHAT WE BELIEVE

WHO WE ARE

We are a company of people engaged in the production of food, seeking to pursue truth and integrity, and committed to creating value for our shareholders, our customers, our team members, and our communities.

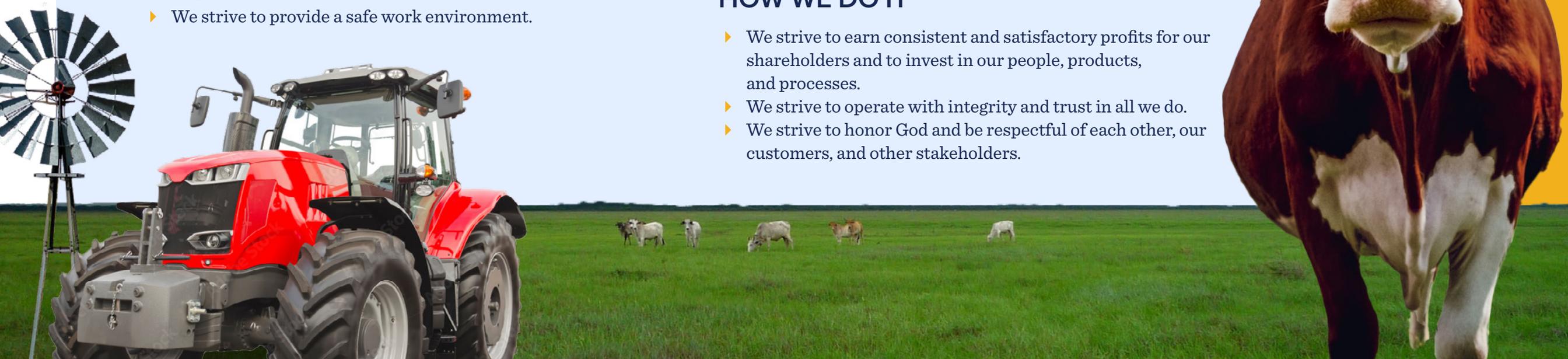
- ▶ We strive to be honorable and operate with integrity.
- ▶ We strive to be faith-friendly and inclusive.
- ▶ We strive to serve as stewards of the resources entrusted to us.
- ▶ We strive to provide a safe work environment.

WHAT WE DO

- ▶ We feed our families, the nation, and the world with trusted food products.
- ▶ We serve as stewards of the animals, land, and environment entrusted to us.
- ▶ We strive to provide a safe work environment for our team members.

HOW WE DO IT

- ▶ We strive to earn consistent and satisfactory profits for our shareholders and to invest in our people, products, and processes.
- ▶ We strive to operate with integrity and trust in all we do.
- ▶ We strive to honor God and be respectful of each other, our customers, and other stakeholders.





WHAT'S EXPECTED

WHO IS COVERED BY THE CODE?

Our Code governs all of our business decisions and actions regardless of where we are located in the world and it applies to team members, members of Tyson's Board of Directors, our subsidiaries, and the joint ventures over which we have majority ownership and/or management control (including every team member, officer and director of such joint ventures).

All team members and members of the Board of Directors are responsible for complying with our Code, company policies and the law. We are also responsible for completing our annual compliance training curriculum and certifying that we understand and agree to follow this Code.



KNOWING & DOING WHAT'S RIGHT

Our Code attempts to address the most common legal and ethical issues you may encounter. It's impossible to address every situation in one document. Before making a decision, STOP and ASK yourself the questions below, and ASK for guidance if you still are unsure.

DOING BUSINESS GLOBALLY

We do business in multiple countries around the world, and our team members represent many nationalities. We respect our team members' diverse cultures and commit to complying with local laws.

CONSEQUENCES FOR VIOLATIONS

Any team member or member of the Board of Directors who violates our Code, company policies or laws will be subject to disciplinary action, up to and including termination.

When deciding whether an action is ethical and in compliance with our code, ask yourself:



- 1 Is my decision legal?
- 2 Will my decision comply with Tyson's Core Values and policies?
- 3 Will my decision reflect the culture and reputation of Tyson as a whole?
- 4 Will my decision feel as though I'm doing what is right?

PLEASE CLICK HERE TO ASK QUESTIONS IF YOU NEED GUIDANCE





DOING WHAT'S RIGHT FOR

TEAM MEMBERS

Our success is created by and dependent upon our team members. We treat one another with dignity and respect. We are committed to protecting human rights and maintaining a safe work environment free of harassment and discrimination. We offer team members many ways to raise concerns, ask questions, and report suspected misconduct. We fully investigate and address misconduct, and are committed to preventing the recurrence of misconduct. We do not tolerate retaliation for asking questions or reporting concerns.



QUESTIONS AND CONCERNS

ASK QUESTIONS

We encourage team members to ask questions, including about our Code, policies, and work environment. If you have questions, there are many ways to get answers:

- ▶ Start with our Code and policies.
- ▶ If you can't find an answer or if you are still uncertain, ask a member of your management team. Local management can answer questions about policies, processes, procedures, work responsibilities and your working environment.
- ▶ Ask your local Human Resources (HR) representatives. Contact the Ethics & Compliance Department by using the online form or emailing ethics@tyson.com.

REPORT MISCONDUCT

All team members and members of the Board of Directors are required to report promptly and in good faith any known or suspected violation of the Code of Conduct, laws, or unethical conduct.

Don't assume someone else will report the misconduct or ask another team member to make the report. Reporting a concern should be as easy as possible. That's why there are a variety of ways to tell us when something's wrong.

You can contact:

- ▶ Your supervisor
- ▶ A member of your management team
- ▶ Your local HR representative
- ▶ Ethics Line at [1-888-301-7304](tel:1-888-301-7304).
- ▶ Our Ethics & Compliance Department at ethics@tyson.com.

Reports may be made anonymously through our Ethics Line or you can ask the Ethics & Compliance Department to treat your report as anonymous. Unless prohibited by local law, a request to remain anonymous will be honored.



 Phone: 1-888-301-7304	 Web: TELLTYSONFIRST.COM
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*The Ethics Line is operated by an independent third party 24/7 in multiple languages with an option to remain anonymous. Refer to resources for Ethics Line numbers unavailable outside the U.S.

ETHICS & COMPLIANCE DEPARTMENT ASSESSES QUESTION OR CONCERN



Answer and respond to team member



Assign for internal investigation per policy



Follow-up with team member as warranted

If you are aware of material or significant concerns or complaints regarding accounting matters or publicly filed documents, our Whistleblower Policy contains information about raising these concerns with the Audit Committee of the Board of Directors.



QUESTIONS AND CONCERNS

Continued

HOW MANAGERS SHOULD HANDLE CONCERNS

If someone comes to you with a concern, you have a special responsibility to listen and act. Handling concerns appropriately is critical to preserving trust and protecting the Company.

IF SOMEONE RAISES A CONCERN, TAKE THESE SPECIFIC STEPS:

- ▶ Remove distractions and listen carefully.
- ▶ Respond respectfully and take every concern seriously, even if you disagree. Show that you are committed to solving the problem.
- ▶ Thank the person for speaking up—remember that they've just done something difficult and very important for the Company.
- ▶ Take steps to protect the person's confidentiality—avoid discussing the conversation with other team members.

- ▶ As a manager, you should feel empowered to resolve routine operational and performance issues yourself.
- ▶ Reports of misconduct or behavior believed to be illegal, unethical, or which violates the Tyson Code of Conduct must always be sent to the Ethics & Compliance Department for assessment and investigation.
- ▶ If you have a question or are not sure whether you can or should resolve the issue yourself, you can always email the Ethics Department at ethics@tyson.com for advice.



Q & A

WHAT HAPPENS WHEN I CALL THE ETHICS LINE?

A:

The Ethics Line is operated by an independent third-party call center, and is available 24 hours a day, seven days a week. Your call is answered by a trained operator, and more than 200 languages are available. The details of your concern are typed into a confidential report and sent to the Ethics & Compliance Department, who then assesses the matter and assigns an investigator or refers the matter to the right Tyson team member for resolution. Your call is not recorded, and the details are only provided to those investigating your concern. You have the option to remain anonymous, except where restricted by local law. At the end of your call you are given a reference number to use if you have additional information to provide or to check the status of your report. You can make reports without fear of retaliation.

QUESTIONS AND CONCERNS

Continued

NO TOLERANCE FOR RETALIATION

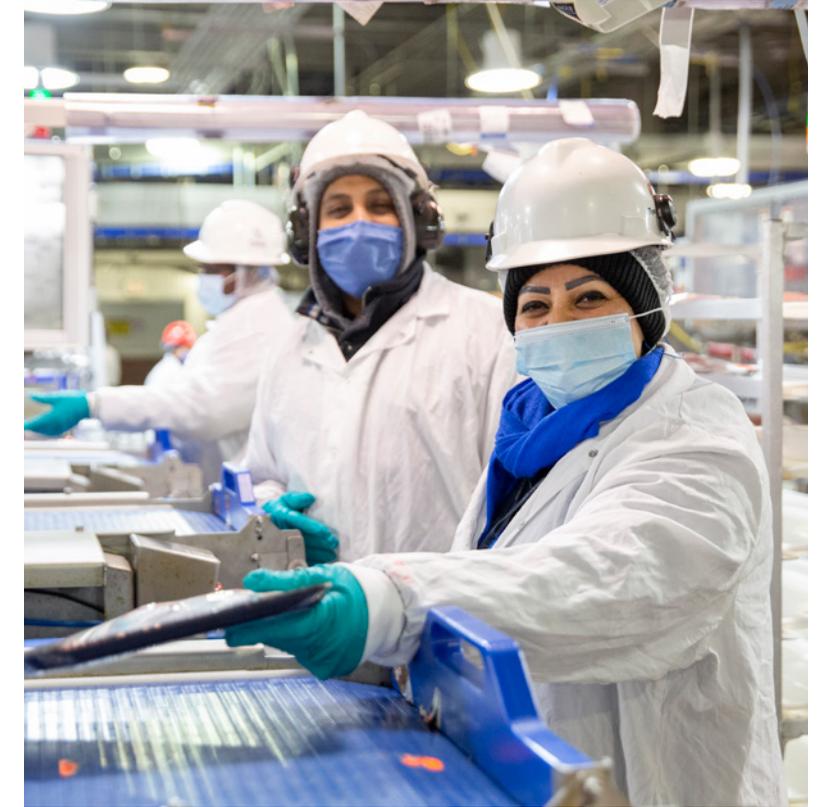
We are committed to maintain a culture where we can speak up when something is not right. That is why we do not tolerate retaliation against someone for voicing concerns in good faith. This includes asking questions, raising issues, reporting suspected misconduct, participating in investigations, or refusing to do something that violates our Code, policies or the law, even if your refusal results in the loss of business to Tyson. Anyone found to have engaged in retaliation will be subject to disciplinary action, up to and including termination.

We prefer team members raise concerns internally, however, we do not tolerate retaliation for raising concerns or complaints to external parties like government officials or regulatory agencies.

INVESTIGATING MISCONDUCT

We take reports of suspected ethical and legal misconduct seriously. We fully investigate alleged misconduct. We address misconduct and are committed to preventing the recurrence of misconduct. Your identity and the information you provide will be kept confidential except as needed to conduct the investigation. While you may choose to remain anonymous, where permitted by local law, it may be more difficult or even impossible for us to investigate anonymous reports.

If you are involved in an investigation, you must fully cooperate and provide truthful and complete information. You should never provide misleading information or alter, destroy, or cover-up evidence relevant to an investigation. You must never retaliate against team members who report suspected misconduct or participate in an investigation.



Resource Links



QUESTIONS AND ANSWERS



POLICIES



MANAGEMENT EXPECTATIONS

“People make a business. Not numbers, not animals, not anything else. People make a business.”

– DON TYSON, FORMER CHAIRMAN AND CEO

MANAGERS ARE CRITICAL TO OUR SUCCESS

Our management team members must act ethically and lead by example. This means living out – both in words and actions – our Core Values and Code principles.

As a manager of team members, you have a duty to set the culture and work environment on your team. The way you make decisions, handle concerns, different opinions, and even bad news, will set the foundation for trust with your teams and stakeholders. Your success and the success of your team depends on the trust you build together.

It’s important for managers to create an environment of trust where team members are comfortable asking questions and raising concerns without fear of retaliation. Because you are often the first point of contact when team members have questions and concerns, be ready and willing to listen. Respond with dignity and respect. Follow through on commitments.

If you don’t know the answer or are unsure, let the team member know you’ll get back to them, refer the question or concern to the relevant department, and follow up.

STEPS MANAGERS USE TO BUILD A CULTURE OF TRUST

- ▶ Talk to your team about ethical behavior and be clear that you expect work to be done with integrity.
- ▶ Lead by example, such as by modeling ethical decision-making.
- ▶ Ensure your team knows that for results to matter, they must be achieved the right way.
- ▶ Satisfy yourself that results have been achieved the right way.
- ▶ Make sure your team knows you will listen, even if they have something difficult to say.



Resource Links



POLICIES



CONFIDENTIAL INFORMATION

We expect team members to protect our Company's confidential and proprietary business information. In your job, you may have access to confidential information about our business processes, other team members, or business partners including customers and suppliers. Only disclose such information if permitted to do so under applicable law, regulations, and company policies or procedures.

Confidential information comes in multiple forms and can be written, oral, or electronic. Consult the Data Classification Policy to make sure you understand the different types of data so you can protect it appropriately.

The restriction on disclosing confidential information does not prevent team members or members of the Board of Directors from reporting concerns of any suspected misconduct to management or prevent team members from reporting retaliation. It also does not prevent team members from reporting concerns to government agencies or responding truthfully to their lawful questions or requests.

Remember if confidential information about Tyson or a business partner is material and non-public, you may not use this information when deciding to buy or sell securities of these companies. See Insider Trading section for additional information.



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POLICIES

TYPES OF DATA

► PUBLIC DATA:

Data that is open to all team members and third parties. Examples include publicly issued press releases, publicly posted job announcements, and SEC filings.

► INTERNAL DATA:

Data that is proprietary in nature and used in day-to-day company operations. Examples include most Tyson policies and procedures, purchase orders, production schedules, and outage start/end times. Most content is considered internal data.

► CONFIDENTIAL DATA:

Data that must be guarded due to proprietary, ethical, or privacy considerations and protected from unauthorized access, modification, transmission, storage, or other use. Examples include contracts, non-restricted team member information, engineering designs, facility safety and floor plans, and business partner information such as proprietary non-public information on pricing, sales volumes, and product specifications.

► RESTRICTED CONFIDENTIAL DATA:

Data that is protected by statutes, regulations (e.g., SOX, HIPAA, PCI, Privacy – CCPA and GDPR, etc.), contract language, or designated by managers. Examples of Restricted Confidential Data include trade secrets and intellectual property, business strategies, customer and supplier lists, technology platforms in use or under review, feed formulations, any data identified as attorney-client privilege, and any data identified by government regulation for confidential treatment or sealed by court order.



HUMAN RIGHTS

We are committed to respecting and promoting human rights across the globe, particularly those of team members. That is why we work with business and supply chain partners who promote the following basic principles of human rights and the law:

- ▶ Not tolerating child, forced or abusive labor in any operations or facilities.
- ▶ Complying with all applicable employment and wage and hour laws to include minimum wage, overtime, and maximum hour rules.
- ▶ Supporting equal rights and the elimination of employment discrimination.
- ▶ Respecting team members' right to choose whether they want to unite for collective bargaining purposes.
- ▶ Providing team members with a safe and healthy workplace, and protecting the environment.
- ▶ Working with governments and communities in which we operate to improve the educational, cultural, economic and social well-being of those communities.



Resource Links



POLICIES



EMPLOYMENT PRACTICES



DIVERSITY, EQUITY & INCLUSION

We appreciate and respect the unique backgrounds, experiences, thoughts and talents of our team members, business partners, stakeholders and consumers. We cultivate a culture that supports and enhances our ability to recruit, develop and retain diverse talent at every level. Everyone is valued for their distinct contributions to the growth and success of our business. You play a critical role in sustaining this culture of diversity, equity, and inclusion that are central to our Core Values.

AUTHORITY TO WORK

We are committed to complying with applicable laws and employing individuals who are legally authorized to work in the country where they are seeking employment.

We inspect, verify, and document the identity and employment authorization of every new team member. We are prohibited from knowingly hiring or allowing anyone to continue working if they are not authorized for employment. After an offer of employment has been accepted, all newly hired and rehired team members complete the locally required employment verification forms and provide employment eligibility documentation.

You are required to report to your supervisor, a member of your management team, your local HR representative, or the Ethics Line anyone who is not legally authorized to work in the country where they are employed. In complying with immigration laws, it's important that you cooperate in any training, certification, record keeping and/or third-party verification compliance requests from HR.



EMPLOYMENT PRACTICES

Continued

PREVENTING HARASSMENT AND DISCRIMINATION

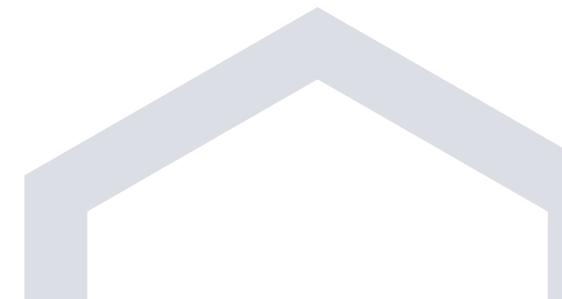
We are committed to providing a workplace free of unlawful harassment and discrimination such as that involving race, religion, color, age, national origin, veteran status, disability, retaliation, genetics information, sex (including pregnancy), sexual orientation, or gender identity.

We are committed to treating each other fairly, without prejudice. We all have the right to be treated with dignity and respect and to work in an environment free from harassment and discrimination. Harassment is a form of unlawful discrimination that consists of unwelcome behavior based on a protected category (i.e. race, color, religion, sex (including pregnancy), national origin, sexual orientation, age (40 or older), disability or genetic information) that creates an intimidating, hostile, or offensive work environment. Harassment comes in many forms, including physical actions, verbal or written remarks, pictures, video recordings or drawings.



We provide equal employment opportunities by treating our team members and those seeking employment fairly. This means our employment decisions are based on merit – skills, performance, abilities, and qualifications – and without regard to non-job-related conditions or characteristics.

You should never act in a harassing manner. It's important to remember that in some cases harassment is determined both by the objective characteristics of your actions, which are measured by a “reasonable person” standard, and the subjective belief of others who perceive your actions as harassing, regardless of your intentions. You are expected to treat team members fairly and to use good judgment in your communications and actions, both in and outside of the workplace. This expectation also applies to our growers, producers, suppliers, brokers, service providers, agents, customers, and other business partners.





EMPLOYMENT PRACTICES

Continued

RELIGIOUS ACCOMMODATION

We strive to be faith-friendly by acknowledging all faiths respectfully. At the heart of this commitment is a profound respect for our rich culture centered on the idea that faith and traditions enrich the workplace. Contact your local HR representative if you believe work requirements conflict with your sincerely held religious beliefs or practices. HR will provide the guidelines and procedures for requesting a reasonable accommodation.

Resource Links



QUESTIONS AND ANSWERS



POLICIES

DISABILITY ACCOMMODATION

We are committed to a workplace free from disability discrimination. If conflicts arise between work requirements and a team member with a disability, contact your local HR representative to discuss the process for reasonable accommodation.



HEALTH & SAFETY

We Care! The health and safety of our team members is our top priority. We strive for zero injuries and illnesses. We maintain a safety culture focused on the goal of eliminating workplace incidents, risks and hazards. Our processes help eliminate events by reducing their frequency and severity. We also closely review and monitor our performance.

We expect you and our business partners to understand and comply with applicable safety and health laws, regulations, and company policies and procedures. If you are aware of or suspect any unsafe work condition, threat or unusual action or situation, you must immediately report it to a member of management.

We Care by following safety policies and procedures.

*We Care by following our **Tyson Commitment to Team Members** During COVID-19 Pandemic.*



RAISE YOUR CONCERNS TO A MEMBER OF MANAGEMENT IF YOU:

- ▶ Are asked to do a task you consider unsafe.
- ▶ Are asked to do a job you think you are not properly trained to do that may harm you or others.
- ▶ See someone performing a task that you think is unsafe or the person is not properly trained to do.
- ▶ Suspect a vehicle or piece of equipment is not operating properly and may be unsafe to you or others.
- ▶ Observe or are made aware of an unsafe condition or a potential danger to you or others.

HEALTH & SAFETY

Continued

WORKPLACE VIOLENCE

We are committed to providing you with a safe work environment, free from workplace violence. We treat others with dignity and respect and should never engage in any act that could cause another person to feel threatened or unsafe.

Workplace violence may include verbal or physical assaults, threats, expressions of hostility, intimidation or aggression. In addition, making maliciously false statements against another person is considered workplace violence.

SUBSTANCE ABUSE

We are committed to providing you with a safe work environment that is drug and alcohol-free.



Resource Links



QUESTIONS AND ANSWERS



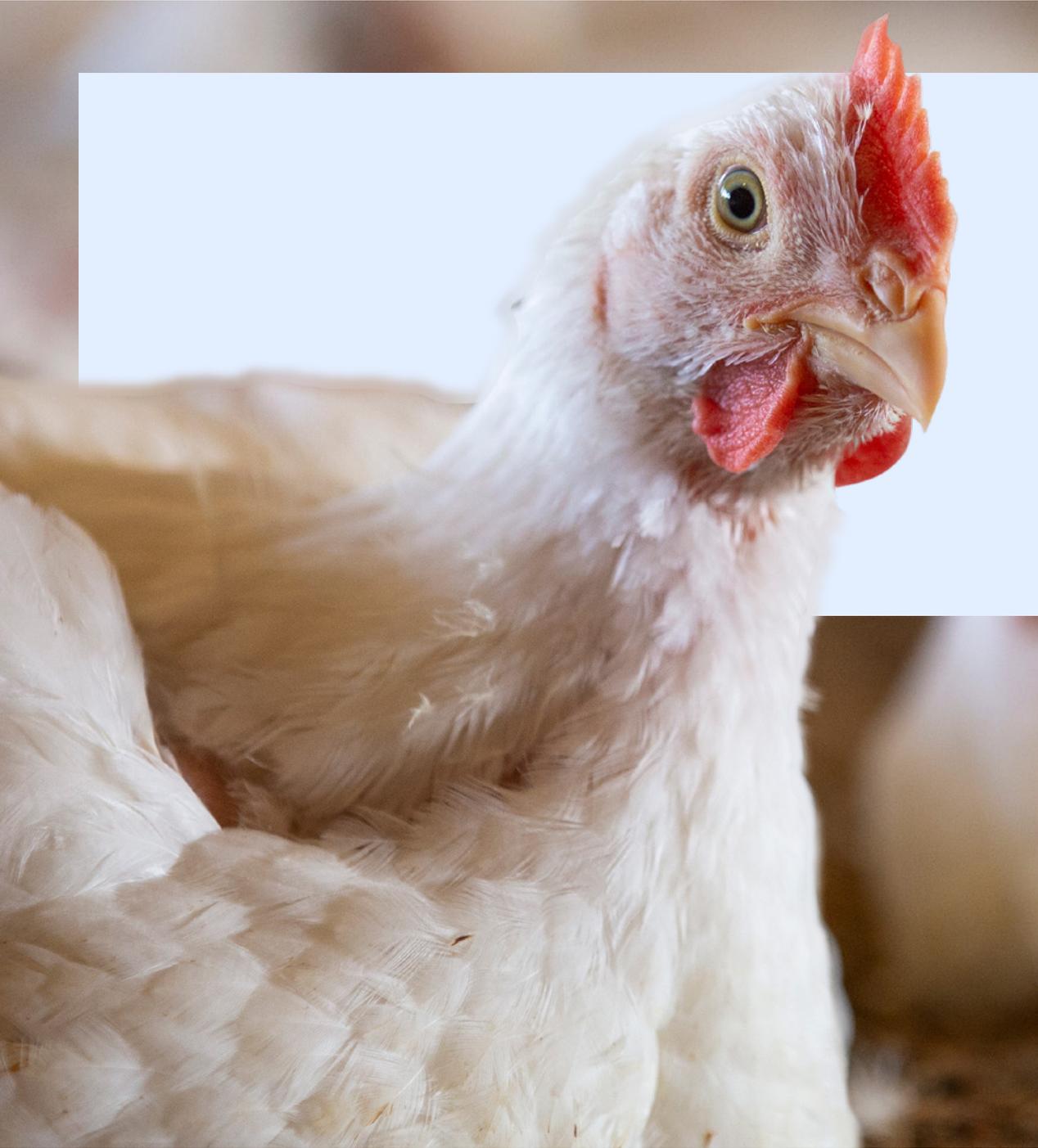
POLICIES

✓ DOs

- ▶ If prescribed medication that alters your physical or mental ability to perform your job, immediately report this to the Occupational Health Service office.
- ▶ If you think you have a substance abuse problem, we encourage you to contact your HR representative for information on seeking help.

⊘ DON'Ts

- ▶ Use any substance that may impair your job performance; doing so presents an unacceptable safety risk to you and others.
- ▶ Work under the influence of alcohol, drugs, or controlled substances.
- ▶ Possess, sell, use, transfer, or distribute illegal drugs or controlled substances in the workplace.



DOING WHAT'S RIGHT FOR

SUPPLIERS & CUSTOMERS

We build long-lasting relationships based on integrity and trust with our growers, producers, suppliers, and customers. We are committed to delivering safe, high quality food products. We compete legally and ethically to maintain and grow our business.

FOOD SAFETY

Our customers and consumers trust us to deliver safe, high quality food products that provide value. In keeping with these expectations, food safety is of paramount importance throughout the entire production process. We expect all team members to comply with government regulations, our food safety and quality assurance (FSQA) policies and procedures, and our customers' specifications. If you are aware of or suspect any violation or non-conformance, whether accidental or intentional, you must immediately report it to a member of management.

Please ask your FSQA representatives what you can do to help ensure compliance! Expectations governing food safety and quality are complex and subject to change.

Resource Links



QUESTIONS AND ANSWERS



POLICIES





SUPPLIERS

We expect our suppliers to follow the principles expressed in our Supplier Code of Conduct, which include the following:

- ▶ Animal welfare
- ▶ Anti-corruptions laws
- ▶ Business practices
- ▶ Team member health and safety
- ▶ Environmental protection
- ▶ Confidentiality and data privacy
- ▶ Labor and human rights
- ▶ Safe and quality food products
- ▶ Sustainable business practices

We are committed to fair competition between suppliers. Team members must follow the procedures set out in our Procurement Policy and related documents when seeking to conduct business with a supplier.

CUSTOMERS

Our relationships with customers are based on trust and integrity. We strive to meet the needs of our customers, work with them responsibly and safeguard their confidential information. We will remain competitive by earning business ethically and legally and by maintaining the exceptional quality and value of our products and services.

Resource Links



POLICIES

CUSTOMER PROMISE

When our customers win, we win.

- ▶ We partner with customers to delight consumers in the constant pursuit of growth.
- ▶ Every day we take the opportunity to strengthen our customer relationships by working together as a team.
- ▶ As consumers demand our products, we promise to be indispensable to our customers, as our customers are indispensable to us.
- ▶ We will remain externally focused, agile and constantly educated in consumer insights.
- ▶ We are optimistic and solution driven, turning challenges into opportunities and finding ways to keep growing together.





GOVERNMENT INTERACTIONS

We do all we can to develop and maintain positive relationships with government officials and government agencies. These government employees serve as our regulators, customers, and partners on many fronts, ranging from employee eligibility to food safety. We understand and respect the role government employees have in inspecting our products, facilities, and processes. If your role requires you to interact with a government official or agency, you must positively represent the Company at all times – both in word and action.

We are proud of the contracts we have providing schools, the military, and other governmental agencies with a variety of Tyson products. The United States government and many countries have strict legal requirements when conducting business with the government, which are far more complex than those applying to our commercial sales accounts. It is important to understand and follow all of these requirements.

Contact the [Law Department](#) if your location or department is being visited or audited by a government or regulatory agency. [Learn more here.](#)



GIFT & HOSPITALITY

We exchange only reasonable gifts and hospitality with customers, suppliers, and other third parties and only for legitimate business purposes. While giving and receiving business gifts and hospitality can build good working relationships and goodwill with customers and suppliers, it also can create a conflict of interest and an appearance of impropriety. We make business decisions based on the quality and value of the products and services offered.



All team members must:

- ▶ Never exchange cash or cash equivalents of any amount (gift cards, checks or gift certificates) or loans.
- ▶ Never exchange any gift or item of hospitality with a government official or commercial entity unless it's expressly permitted by our policies.
- ▶ Be sure to consult and follow any country-specific policies related to gift giving.
- ▶ Always complete a Gift & Hospitality Disclosure Form for any exchange with a government official, regardless of value.
- ▶ Follow the gift and hospitality policies of our business partners and government officials. Not sure whether someone can accept a gift? Ask them about their policy and seek guidance from the [*Ethics & Compliance Department*](#).
- ▶ Follow all local laws, which may be more restrictive than U.S. law.

GIFT GIVING DOs

- ▶ In good faith, without expecting any return favor or improper benefit or business advantage.
- ▶ Legitimate/bona fide and reasonable.
- ▶ Directly related to the promotion, demonstration or explanation of our products or services, or the execution or performance of our contract, and
- ▶ Given infrequently and does not otherwise create the appearance of impropriety.
- ▶ Given to a government official, in accordance with all policies, disclosure processes, and monetary limits.

GIFT GIVING DONT'S

- ▶ Give, offer or receive any gift or hospitality that serves to, or appears to, inappropriately influence business decisions or create an unfair advantage.
- ▶ Give, offer or receive cash and cash equivalents.
- ▶ Use a third party to offer or give gifts or hospitality to a government official.



GIFT & HOSPITALITY

Continued

Resource Links



QUESTIONS AND ANSWERS



VIDEO



POLICIES & DISCLOSURE

GIVING & RECEIVING GIFTS OR HOSPITALITY: DISCLOSURE REQUIREMENTS



If a Government Official **IS** involved and all requirements met:

- ▶ Complete disclosure form regardless of value
- ▶ Consult country-specific guidelines document
- ▶ Pre-approval if value is more than \$25USD (or local equivalent)
- ▶ Provide names of officials, amounts and reason for expense on your expense report



If a Government Official **IS NOT** involved and all requirements met:

- ▶ Complete disclosure form if value is more than \$100USD (or local equivalent)

Cash and cash equivalents are not acceptable to give or receive for both government and non-government parties.



DATA PRIVACY

In the course of business, we may collect, use, store, hold, share or process personal information about team members, business partners, and others. We understand that the handling of personal data is subject to privacy regulations and that we are custodians of that data. We have a duty to handle that personal data with care and use it in a responsible and lawful manner, appropriate to the jurisdictions in which we do business. We must promptly report any actual or suspected violations of our policies, actual or potential data breaches, or other risks to personal information to the Security Department, Law Department, privacy@tyson.com, or www.telltysonfirst.com.

If you receive an inquiry from a Tyson team member, customer, or any other company or party relating to data privacy, deletion of data, opt-outs, data access or any other data-related subject, you must immediately refer them to privacy@tyson.com. Only team members responsible for privacy compliance are authorized to respond to data-related requests.

Resource Links

-  LEARN MORE
-  POLICIES

INTELLECTUAL PROPERTY

Our trade secrets and intellectual property give us a competitive advantage. Protecting this information is critical to our ongoing success. You should only discuss company information that is publicly available with people outside the Company. Only discuss non-public company information with a business partner if a confidentiality agreement (approved by the Law Department) is in place. Just as we expect others to respect our intellectual property, we should respect our business partners' intellectual property.

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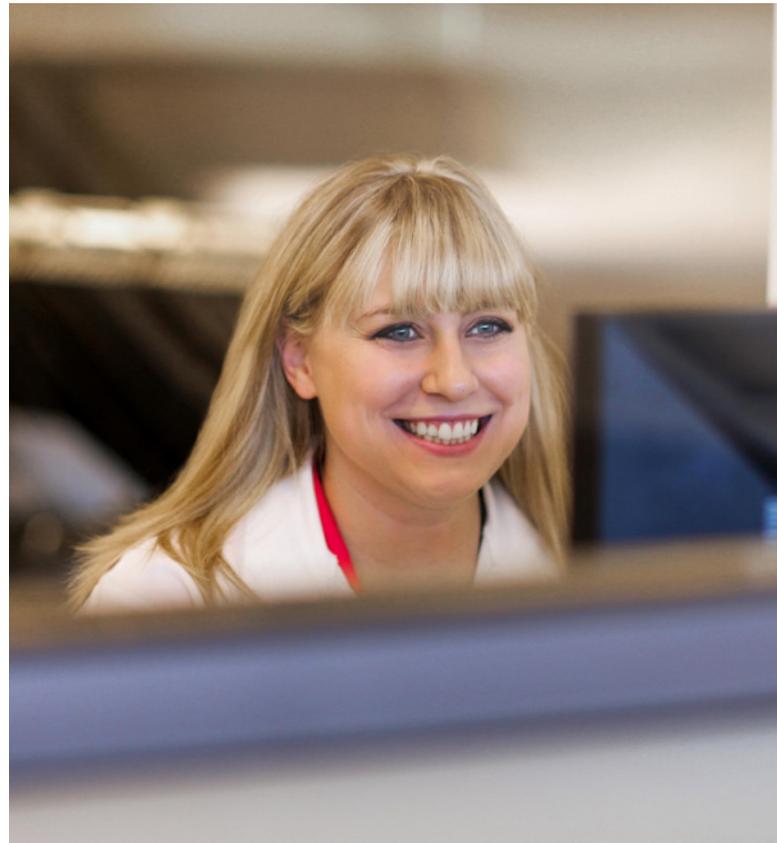


COMPETITION

Competition laws, known as “antitrust” laws in the United States, help foster and preserve fair and honest competition in the marketplace. We comply with the letter and spirit of competition laws wherever we do business. The laws are complex and vary by country. You are encouraged to ask the Law Department for guidance.

These laws are intended to ensure fair, honest and vigorous competition and to protect consumers. Generally, these laws prohibit conspiracies between competitors, improper attempts to monopolize markets and to fix or control prices, wages, and other unfair business practices. Any violation of these laws could have serious and far-reaching consequences for both our Company and the individuals involved.

If you are routinely involved in the negotiation, pricing, review, approval or execution of agreements for the purchase of raw materials, ingredients or supplies or sale of products, you are responsible for understanding these laws beyond the content in our Code, and you must understand and comply with applicable laws and company policy for any country where you are conducting business. If you are aware of or suspect any violation of antitrust laws or company policy, you must immediately report it to the [Law Department](#) or a member of management.



Resource Links



QUESTIONS AND ANSWERS



POLICIES

✓ DOs

- ▶ Base your purchasing or sales decisions on quality, value and customer service.
- ▶ Avoid unfair or deceptive trade practices.
- ▶ Communicate our purchasing or sales programs clearly.
- ▶ Ensure the claims you make about competitors’ products and ours are verifiable and fact-based.
- ▶ Always use legitimate means of obtaining competitive information from appropriate sources and identify the source when sharing competitive information within the Company.
- ▶ Respect business partners’ and competitors’ confidential information and intellectual property rights.
- ▶ Contact the [Law Department](#) with questions.

⊘ DON'Ts

- ▶ Discuss or agree to set prices or other terms of sale (for example, credit terms, trade programs, etc.).
- ▶ Discuss or agree to set production levels or compensation.
- ▶ Discuss or agree to coordinate bids, allocate customers, sales territories or product lines.
- ▶ Reach any agreements or understandings with competitors without contacting the [Law Department](#).
- ▶ Discuss deals with competitors except for the transaction at hand.



DOING WHAT'S RIGHT FOR

THE COMPANY

Our investors depend on us to protect shareholder value. We do this by establishing and following ethical business practices. We avoid conflicts of interests, maintain confidentiality of company information and protect company assets.



CONFLICT OF INTEREST

You have a duty to avoid a conflict of interest or even the appearance of a conflict. A conflict of interest arises when you have a financial or personal interest that could interfere with your obligation to act in the best interests of the Company, or when you use your position with the Company for personal gain. If we don't handle potential conflicts of interest properly, these situations can impact the decisions we make, create the appearance of a lack of fairness and integrity, and harm the Company's reputation. Our Conflict of Interest Policy requires team members and Directors to disclose both actual and perceived conflicts of interest so that others do not question their integrity.

Resource Links

-  VIDEO
-  QUESTIONS AND ANSWERS
-  POLICIES AND DISCLOSURES

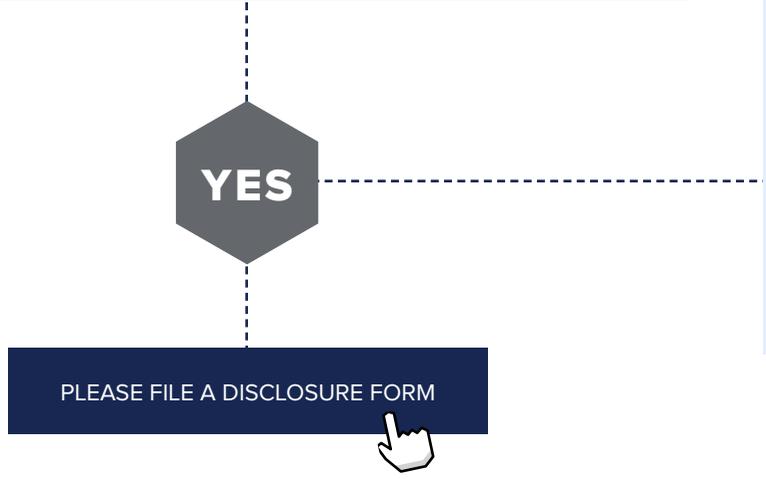
DO YOU OR YOUR FAMILY MEMBERS HAVE A PERSONAL INTEREST IN A BUSINESS ACTIVITY?

PERSONAL INTERESTS

- ▶ Interests held by a team member individually
- ▶ Interests held by a team member's family to include: spouse/partner, parents, sibling, children, step- relatives, and in-laws
- ▶ Any other member of a team member's household

BUSINESS ACTIVITIES ARE TRANSACTIONS INVOLVING THE FOLLOWING BUSINESS PARTNERS:

- ▶ **Vendor:** a company or person who supplies goods and services to Tyson
- ▶ **Customer:** a company or person who directly buys goods or services produced by Tyson
- ▶ **Grower/Producer:** cattle, hog or poultry producers, growers and/or feeders
- ▶ **Other:** participation in activities involving Tyson's customers, vendors, industry or competitors. For example, sitting on boards or councils, consulting, etc.





COMPANY ASSET USE

COMPANY PROPERTY

We trust you to use Tyson property for legitimate business purposes. You are expected to respect and care for this property, and to protect it from theft, loss, damage, misuse, or outside manipulation. It's the right thing to do and it saves money. Managers who have spending authority or manage budgets and accounts have an additional level of responsibility to protect Tyson property. We protect the following: budgets, supplies, equipment, inventories, electronic devices, company time, non-public data and information, machinery, work product, and intellectual property

TECHNOLOGY & ELECTRONIC COMMUNICATION

Information technology systems and associated data are key to our business. We all must protect the confidentiality, integrity, and availability of these systems from being lost or compromised. We expect you to use your devices appropriately and for business purposes.

Tyson owns your work email, accounts, and systems, as well as the information contained on them. While limited personal use is acceptable, you do not have an expectation of privacy for personal communications made on company accounts and devices.

If you are aware of or suspect any violation of acceptable use policies, you must immediately report it to a member of management or the Ethics Line.

Resource Links



QUESTIONS AND ANSWERS



POLICIES

DOs

- ▶ Use only the software, solutions, and communication systems provided by the Company.
- ▶ Keep content free of harassment and discrimination.
- ▶ Follow Company procurement and IT-review policies when purchasing or using any electronic system, service (e.g. software as a service, internet or data connection, e-commerce, web or content hosting, or data exchange), or hardware, including facility-based solutions

DONT's

- ▶ Attempt to bypass any security or configuration controls.
- ▶ Record conversations or meetings unless all parties are aware of the recording.
- ▶ Take screenshots, photos, videos, voice memos, or send any work-related content to a personal account or device, unless the content is managed by a company-provided device or content management policy.
- ▶ Use an expense report or P-card for software or hardware purchases, subscriptions or hardware purchases without prior IT approval.



BOOKS & RECORDS

KEEP ACCURATE AND COMPLETE RECORDS

Our business records must accurately and fairly reflect Tyson's operations and financial condition. All transactions are to be recorded and reported in accordance with generally accepted accounting principles (GAAP). All transactions must comply with our accounting policies and procedures and our established systems of internal controls. Managing our books and records properly maintains their accuracy and integrity, and promotes efficiency, cost savings, confidentiality and legal compliance. We follow all legal requirements when maintaining, retaining and destroying company records, whether paper or electronic.

Know what to keep, what to destroy, and when to destroy it. You are responsible for reviewing, understanding, and following the retention schedules relevant to your work. You also must retain records relevant to litigation, audits or investigations because they may need to be kept longer than the standard requirements.

HELP PREVENT FRAUD

We rely on you to prevent fraud, such as financial statement fraud, stealing or misusing company assets, embezzlement and corruption. Fraud compromises the integrity of our books and records, violates our policies, and may also violate the law. Fraud is often committed to gain something of value or to avoid negative consequences.

Examples of Fraud include:

- ▶ Misstating financial information in our books and records
- ▶ Altering manufacturing numbers to meet productivity goals
- ▶ Misrepresenting sales of products to meet sales goals or gain business
- ▶ Failing to issue purchase orders, delaying goods receipts or holding invoices to avoid being over budget
- ▶ Misuse of purchasing cards
- ▶ Misreporting time you or others worked to earn more pay or to avoid discipline for being late or absent from work
- ▶ Submitting false or inflated requests for payment related to travel and entertainment

Resource Links



QUESTIONS AND ANSWERS



POLICIES

Review the Global Travel Policy to learn:

- ▶ How to submit a travel and entertainment expense report
- ▶ What records are needed
- ▶ How to review and approve your team's reports



BRIBERY & CORRUPTION

We do not tolerate bribery and corruption. Anti-bribery laws around the world, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and other commercial bribery laws, prohibit exchanging or offering money or anything of value to a foreign government official or a commercial entity to improperly influence a business decision or get a business advantage. Corruption can harm communities, damage our reputation and damage markets. That's why we're committed to conducting business and winning customers the right way.

NO CORRUPT BUSINESS ARRANGEMENTS

To operate with integrity, we strictly prohibit any form of corrupt business arrangement with government officials, customers, suppliers, business partners or any other third party. "Corruption" includes bribery, kickbacks, payoffs, facilitation payments, or any other type of improper benefit. This prohibition applies to all our business operations and to anyone acting on our behalf, including distributors, vendors or agents

KEEP ACCURATE RECORDS

To operate with integrity, we record transactions promptly and honestly in accordance with our internal controls. Team members must follow our policies and keep accurate records of every business transaction.

Corrupt business arrangements not only violate our Core Values and policies, they are also a serious violation of applicable anti-corruption laws.

Resource Links



QUESTIONS AND ANSWERS



POLICIES



INTERNATIONAL TRADE

Export controls and economic sanctions regulate where and with whom we can do business. These laws vary widely around the world. Failure to comply with these laws can be severe for both the Company and the individuals involved, seriously impact our business and reputation, lead to significant fines, and can even result in the loss of our export privileges.

Because our business is global, if you are involved in the transfer of goods or services across national borders on behalf of Tyson, you must comply with these laws and regulations, regardless of where you are located. Keep in mind that trade sanction laws can be very complex and change frequently, so a transaction that was allowed in the past might not be allowed now. Consult with the Law Department if you are uncertain of these requirements and before entering into any transaction involving a sanctioned individual, entity or country.

We all have the responsibility to:

- ▶ Confirm our ability to sell to a customer or country.
- ▶ Obtain licenses and permits, submit required forms and pay all taxes and other charges.
- ▶ Avoid doing business with any sanctioned country, organization or individual, unless permitted by law.
- ▶ Know that in certain countries where the Company does business, economic sanctions, embargoes, and other applicable laws may differ from those in the U.S.
- ▶ Contact the ***Law Department*** for guidance.
- ▶ Document transactions completely and accurately.

Resource Links



POLICIES

U.S. anti-boycott laws prohibit the Company from participating or cooperating with boycotts that are not supported by the U.S. government and requires us to report boycott-related requests we receive. You must be familiar with and follow these laws. Inform the ***Ethics & Compliance Department*** immediately if you receive any request to participate or cooperate in a boycott not supported by the United States.





INSIDER TRADING

Under U.S. securities and other trading laws, we may not trade based on inside information about a company or share that information with anyone else.

“Inside information” is material non-public information. Non-public information is information that has not been made available to the public and that a reasonable person would consider important when making an investment decision. Non-public information is proprietary and confidential.

Resource Links



QUESTIONS AND ANSWERS



POLICIES

Trading the company, competitor, or third-party securities while in possession of inside information is considered “insider trading” and is illegal. You also may not share this inside information with someone else, including family members, members of your household or other team members who may use it to buy or sell securities. Follow all trading restrictions and “black-out periods” if they apply given your job responsibilities or position. Exercise caution and avoid even the appearance of anything improper. If you have any questions regarding what is considered inside information or specific stock transactions, contact the [Law Department](#).

Remember, it's your responsibility to follow the securities trading requirements. It's always best to ask before you act.





DOING WHAT'S RIGHT FOR

THE COMMUNITY

As a global Company, we conduct business in many communities around the world. We are committed to making a positive impact in these communities by doing business in a sustainable and ethical manner and by following the laws of each country in which we operate.

ANIMAL WELFARE

We have a moral and ethical responsibility to treat animals in our care humanely and with respect. All our team members and supplier partners must share and take seriously this responsibility. Every individual who works in areas where animals are present must understand and follow our expectations on how we treat and handle the animals in our care. Not only must these expectations be met by us and our supply partners, each of us must report any behavior inconsistent with these expectations, whether accidental or intentional, to management, the Ethics Line or through www.tellysonfirst.com.

ENVIRONMENT

Protecting natural resources is essential to achieving clean air, water and land for the world. Environmental laws govern our business in many ways, such as the use, control, transportation, storage and disposal of regulated materials that may reach the environment as a part of wastewater treatment, air emissions control, solid and hazardous waste generation/ management or uncontained spills. We are committed to compliance with applicable laws and our policies. We set high standards for managing identified environmental risks.

If you are aware of or suspect any violation, whether accidental or intentional, you must immediately report it to a member of management or the Ethics Line.





POLITICAL ACTIVITIES

We follow the strict laws governing corporate political activities, lobbying and contributions. These laws vary around the globe. For this reason, only specific team members, who are authorized by the Government Affairs Department, may engage in efforts to discuss legislation or government policy with political officials on behalf of the Company or contact a government official on behalf of the Company for political purposes.

When you personally participate in the political process, you may only do so using your own money, time and resources.

CHARITABLE GIVING

We believe in giving back to those communities in which we live and work. We support charitable organizations around the world and recognize that giving back comes in many forms including volunteer time, product donations or financial support. We encourage you to become involved with local charities both inside and outside of work.

Team members making charitable donations on behalf of the Company must follow the guidance and tracking requirements found in the Global Giving Policy.

SOLICITATION OF DONATIONS

You should not use your position with the Company to solicit contributions from our business partners or other team members for charitable fundraising or team member activities, even during traditional gift-giving seasons or if the amount appears nominal. We never want our business partners to feel obligated to contribute to these activities to retain our business relationship.



FUNDRAISING/GAMES OF CHANCE

Contact *Ethics & Compliance Department* before engaging in any activities involving raffles, lotteries, games of chance, or any activity that involves the payment of money to obtain a chance to win a prize, even if the beneficiary is a charity. These are highly regulated activities and against the law in most states.

Resource Links



QUESTIONS AND ANSWERS



POLICIES

SOCIAL MEDIA

We recognize the importance of communicating with business partners and consumers through a variety of social media tools. However, these tools present confidentiality problems and reputational issues for the Company if not used properly.

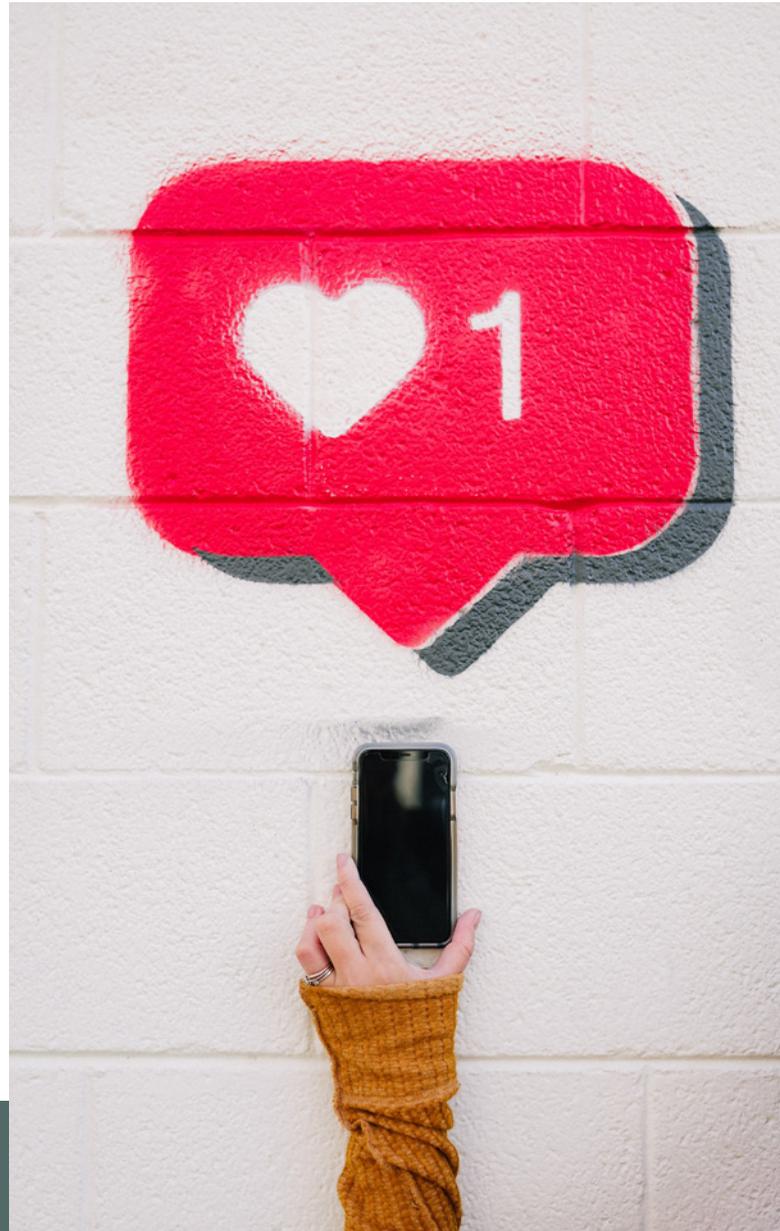
Be responsible when using social media! If you have concerns or complaints about Tyson, we encourage you to use the confidential channels provided in this Code to raise your concerns or policy violations.

Remember your online communications may be referenced forever and can affect both your reputation and Tyson's reputation.

Resource Links



POLICIES



✔ SOCIAL MEDIA DOs

When posting to social media for business purposes:

- ▶ Focus on creating value for our investors and customers.
- ▶ Only post accurate, public information.
- ▶ Never post confidential information.
- ▶ Avoid making claims about our products unless they have been approved by management.
- ▶ Never claim to be “speaking for Tyson” unless the Company authorized you as a spokesperson.

Be mindful of the following policies or statements when you use social media when not working:

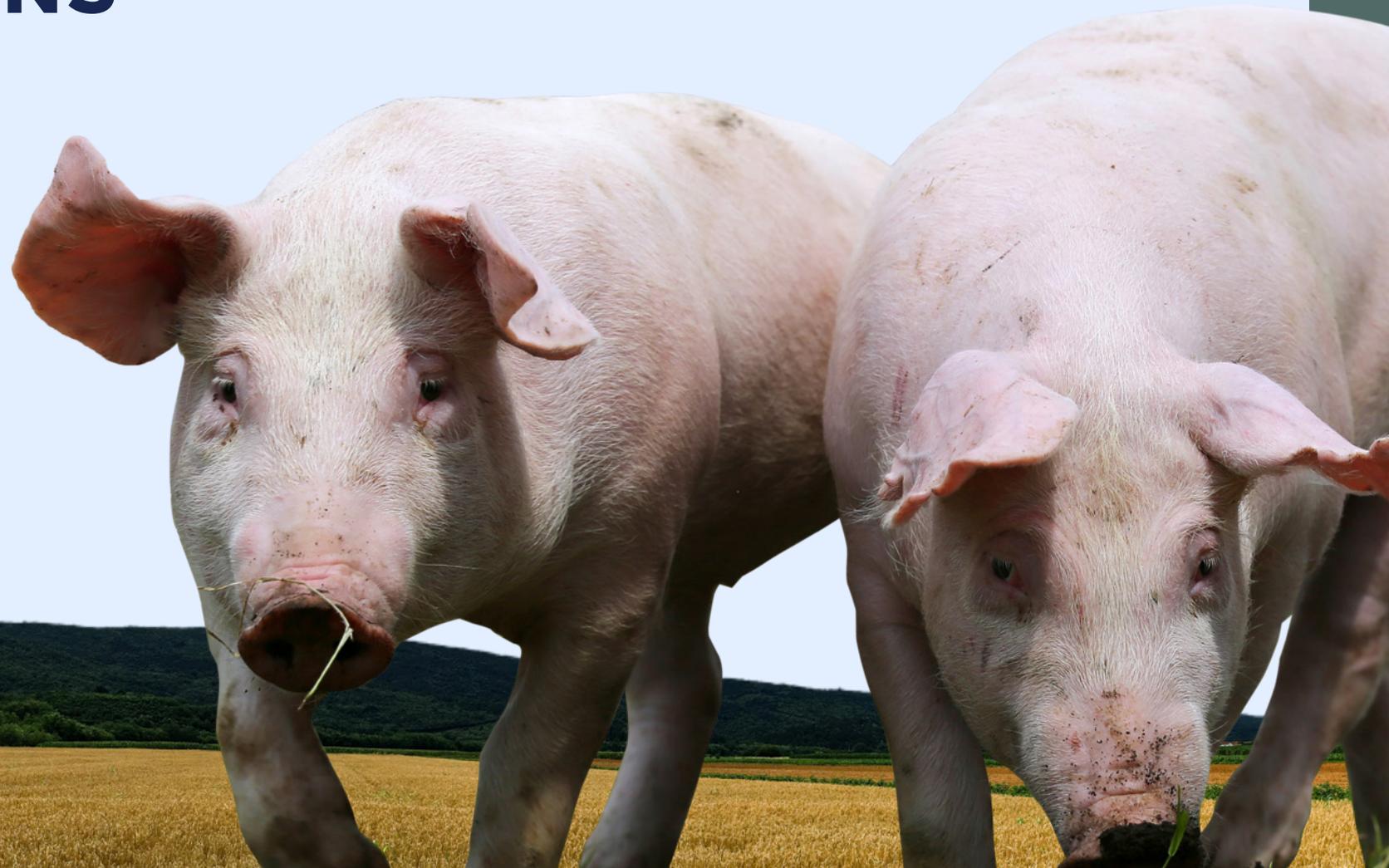
- ▶ Insider Trading
- ▶ Intellectual Property
- ▶ Management Expectations
- ▶ Media Communications
- ▶ Preventing Harassment & Discrimination
- ▶ Workplace Violence



MEDIA COMMUNICATIONS

We have a legal obligation to provide clear and accurate information to the media, financial analysts, investors and the general public. This helps us maintain integrity in our relationships with our business partners and other investors, which in turn strengthens our corporate reputation.

Only authorized persons may speak on behalf of the Company. It's important to remember that unless you have been officially authorized by Tyson, you must never participate in media interviews, events or other forums on behalf of the Company. If you are contacted by a member of the media, refer them to our corporate communications team at tysonfoodspr@tyson.com.





RESOURCES





POLICY REFERENCE

COMPANY POLICIES

Our corporate policies are located in PolicyTech and may be accessed from the Source page by clicking the “Policy” tile. If your location is not using PolicyTech, contact your local HR representative for the location of your policies.

POLICIES REFERENCED IN THE CODE OF CONDUCT

- ▶ Acceptable Use Policy
- ▶ DA Accommodation Policy
- ▶ Anti-Boycotting Policy
- ▶ Anti-Retaliation Policy
- ▶ COI Key Reminders
- ▶ Compliance Training Policy
- ▶ Conflict of Interest Policy
- ▶ Confidentiality Policy
- ▶ Contract Poultry Farmers’ Bill of Rights
- ▶ Copyright Policy
- ▶ Corporate Accounting & Treasury Policies
- ▶ Data Classification Policy
- ▶ Drug & Alcohol Policy
- ▶ Employment Eligibility Policy
- ▶ Environmental Policies
- ▶ Equal Employment Opportunity Policy
- ▶ Food Safety & Quality Assurance Policies
- ▶ Gift & Hospitality Policy
- ▶ Global Anti-Corruption Policy
- ▶ Global Antitrust Policy
- ▶ Global Giving Policy
- ▶ Global Privacy Policy
- ▶ Global Travel Policy
- ▶ Human Rights Policy
- ▶ Harassment & Discrimination Policy
- ▶ Health & Safety Policies
- ▶ Information Technology Policies
- ▶ Internal Investigations Policy
- ▶ Media Relations Policy
- ▶ Procurement Policy
- ▶ Record Retention & Disposal Policy
- ▶ Religious Accommodation Policy
- ▶ Sanctions Policy
- ▶ Securities Trading Policy
- ▶ Social Media Policy
- ▶ Standards of Behavior Management Policy

- ▶ Supplier Code of Conduct
- ▶ Sustainability Report
- ▶ Team Member Promise
- ▶ Whistleblower Policy

FORMS

- ▶ Conflict of Interest Disclosure Form
- ▶ Gift & Hospitality Disclosure Form

WAIVERS

Any team member may request a Code of Conduct waiver of applicability from the [*Chief Compliance Officer*](#). The Company will promptly disclose any waivers to shareholders as required by law.



CONTACTS

Have questions you are unable to answer by reading the Code or company policy? We encourage you to refer to the policy, ask a member of management, your local HR representative, or the Ethics & Compliance Department using the online form or email ethics@tyson.com.

If you are aware of or suspect any violation of our Code, company policies or the law, you have a duty to raise your concerns. We encourage you to raise your concerns to your supervisor, a member of management or your local HR representative.

ETHICS LINE - U.S.

United States: (888) 337-7481
 United States: (888) 301-7304
 United States: (800) 532-7890
 United States: (770) 582-5214

ETHICS & COMPLIANCE DEPARTMENT

E-Mail: ethics@tyson.com
 Mail: 2200 Don Tyson Parkway
 (AR076124)
 Springdale, AR 72762

ETHICS LINE - INTERNATIONAL

Australia: 1-800-370-595
 Austria: (888) 301-7304
 Brazil (888) 301-7304
 Brazil 0800-892-1605
 China: (888) 301-7304
 China: 400 120 4723
 China North 10-800-711-1053
 China South 10-800-110-0980
 Colombia: (888) 301-7304
 India: (888) 301-7304
 India: 000-800-100-1561
 Italy: 800-790596
 Malaysia: (888) 301-7304

Mexico: (888) 301-7304
 Mexico: 001-888-301-7304
 Netherlands: 0800-290-0010
 New Zealand: 0508-204-118
 Philippines: (888) 301-7304
 Korea, Republic of South 00798-1-1-003-8566
 Thailand: 1800-013-085
 Turkey: (888) 301-7304
 Saudi Arabia 800 850 1583
 United Arab Emirates 800 0120167
 United Kingdom: 0800-917-9780



TRANSLATIONS

- ▶ Tyson Code of Conduct - Chinese
- ▶ Tyson Code of Conduct - Dutch
- ▶ Tyson Code of Conduct - English
- ▶ Tyson Code of Conduct - Korean
- ▶ Tyson Code of Conduct - Malay
- ▶ Tyson Code of Conduct - Portuguese
- ▶ Tyson Code of Conduct - Spanish
- ▶ Tyson Code of Conduct - Tagalog
- ▶ Tyson Code of Conduct - Thai
- ▶ Tyson Code of Conduct - Turkish



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