

International Code of Conduct



Tyson Foods, Inc.



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We are leaders in our industry, and, at Tyson Foods, ethical business is good business – it's the foundation of a successful business. Our business success depends on our commitment to, and reputation for, operating with integrity, respect, accountability, and honor. To do so, we must uphold our Core Values and our Code of Conduct.

Tyson Foods' Code of Conduct is a written guideline to help us make good business decisions; it's our guide to doing what's right. It's the foundation for our company's policies. Of course, the Code cannot address every business situation, but it is a good source to provide guidance on how we should conduct our business. Ethical business must be everyday business for every one of us. After all, there's no right way to do the wrong thing.

If you need further guidance, it's important to seek advice; you can always talk to your supervisor, Human Resources, or the Compliance Department. When in doubt, check it out!

John Tyson



Chairman
Tyson Foods, Inc.

Dick Bond



President and CEO
Tyson Foods, Inc.

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SECTION 1: INTRODUCTION

Applicability

Tyson Team Members are expected to conduct themselves in an ethical and responsible manner in the performance of their work and business relations, without regard to geographical location. An important part of ethical and responsible business conduct is to not only comply with all laws and regulations applicable to our business, but to also comply with the specific provisions of the Tyson International Code of Conduct.

This International Code of Conduct is aligned with Tyson Foods' Core Values and sets forth the basic standards of conduct expected of all Team Members working in international operating entities, including wholly owned subsidiaries, majority owned joint ventures, and foreign sales offices of Tyson Foods, Inc.

Reporting and Retaliation

All Team Members are required to report any suspected violation of the law, applicable regulations, company policies, or the provisions of this Code of Conduct. Tyson provides several options for Team Members to report allegations. Information should be posted in the local office explaining those options. It is always an option to contact the Compliance Department or the Legal Department both of which are located at our World Headquarters in Springdale, Arkansas.

When deciding whether or not an action is ethical, Team Members are encouraged to consider the following questions:

1. Does it comply with Tyson Foods' Core Values?
2. Is it the right thing to do?
3. Were others treated the way I want to be treated?
4. Would Tyson Foods or I be embarrassed if this action was reported to the public?
5. Is it legal?

Retaliation or discipline against those who in good faith report a suspected violation or wrongdoing is strictly prohibited.



Tyson Tyson Foods Inc.

Our Core Values:
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, and our people in the process.

Who we are:


- We strive to be a company of diverse people working together to produce food.
- We strive to be honorable people.
- We strive to be a faith-friendly company.

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.



Consequences

Appropriate corrective action, up to and including termination, may be taken against any Team Member whose conduct violates the provisions of this Code of Conduct.

Corrective action may extend to individuals responsible for the failure to prevent, detect, or report a known violation. However, in cases where a reporting Team Member is involved in a violation, the Team Member may be disciplined when appropriate.

Company Records

Tyson Foods expects Team Members to create clear and accurate records, whether paper or electronic. All business records and books, such as travel and expense reports, vouchers, bills, payroll documents, service records, and other reports, should be prepared with integrity and care. Any false or misleading entry into any company record is prohibited.

Records must be maintained securely in accordance with generally accepted accounting practices, applicable government or securities regulations, and company policy. Records destruction should be governed by company-approved retention schedules and any applicable litigation or tax holds.

Team Members must keep accurate records reflecting the true nature of all transactions. Falsification of records is illegal and may be grounds for criminal prosecution.

Confidential and Personal Information

Each day, Tyson Team Members are entrusted with confidential information from and about Team Members, customers, and vendors (pricing information, wage and salary information, and company product specifications). Tyson Team Members are prohibited from using or sharing any confidential information with third parties unless the third party has signed a non-disclosure agreement through the Legal Department located at our World Headquarters in Springdale, Arkansas.

SECTION 2: WHO WE ARE

- **We strive to be a company of diverse people working together to produce food.**
- **We strive to be honorable people.**
- **We strive to be a faith-friendly company.**

Tyson Foods' Core Values ensure our company's commitment to the well-being of all Tyson Team Members. All Team Members are expected to act responsibly in the workplace at all times by treating each other with dignity and respect; following all rules, policies, regulations, and laws; reporting policy violations; and working ethically.

Dignity and Respect

Team Members should treat one another with dignity and respect at all times. Team Members should also be fair, reasonable, and courteous in their interactions with one another. All Team Members should practice the "Golden Rule" of treating others as they wish to be treated, thus helping to create a unified and respectful workplace. This includes not harassing or otherwise conducting yourself toward anyone in an unwelcome or discriminatory manner on the basis of race, sex, age, religion, color, national origin, or disability.

Team Members are expected to represent the company in a positive manner at all times by setting an example of professional behavior for other Team Members. Team Members may not pursue, date, or otherwise engage in intimate/romantic relationships with anyone under their direct supervision. Team Members are expected to exercise good judgment inside and outside of the workplace.

Inclusion and Diversity

Understanding, respecting, and valuing inclusion and diversity is central to both Tyson Foods' Core Values and its business philosophy. At Tyson Foods, all Team Members strive to live our company's Core Values and put people at the center of our business. Team Members continually work to reach our goal of creating a culture and a vision that supports and enhances all Team Members. This culture should appreciate the Tyson team as a whole, as well as the unique qualities and talents of each individual. Tyson Foods is dedicated to maintaining an inclusive work environment where all Team Members feel welcome, and each individual is a valued member of the Tyson team.

Potential Conflicts with Tyson Business

Team Members have a duty to avoid possible conflicts of interest. For example, if a situation arises where a Team Member's or affiliated party's personal interest conflicts with the interests of Tyson Foods, or a Team Member uses his or her position to achieve personal gain, a conflict of interest may exist. Such a conflict of interest may harm the integrity of both Tyson Foods and the Team Member. All Team Members have a duty to report any personal, property, or business interests or obligations that might conflict or appear to conflict with the interests of Tyson Foods to their supervisors, their local Human Resources Department, or the Compliance Department at our World Headquarters in Springdale, Arkansas.

Faith-Friendly Workplace

Tyson Foods strives to be a faith-friendly company by respecting all Team Members and acknowledging their faith in a manner that is respectful of all traditions and beliefs. At the heart of Tyson Foods' commitment to its Team Members is a profound respect for the company's rich culture of various traditions, faiths, and beliefs. Tyson Foods' vision of being a faith-friendly company centers around the notion that faith can and does enrich the workplace.

Substance Abuse

A large part of Tyson Foods' success relies upon each Team Member performing his or her best while at work. Misusing prescription and over-the-counter medications or using alcohol or unlawful drugs in the workplace prevents Team Members from contributing at their highest levels and puts their fellow Team Members in danger. Tyson Foods does not allow the use of alcohol or unlawful drugs in the workplace and strongly encourages Team Members to seek help for dependency issues.

Use of Company Assets

Tyson Foods provides Team Members with the assets necessary to achieve company goals. These assets may include such items as office equipment, computer, cell phone, or a company car/truck. The misuse or disclosure of any company asset costs the company money and is prohibited.

E-mail and Internet Usage

When a Team Member uses a Tyson e-mail account, or visits a Web site on the Internet at work, he or she is in effect representing Tyson Foods to the world. Tyson Foods expects each Team Member to use e-mail and the Internet with this in mind. Team Members may not use these tools at work for personal gain or for unlawful or unethical purposes. Team Members are expected to use e-mail and the Internet responsibly and to limit personal use of these tools in the workplace so that it will not affect job performance or the success of the company. The Company does monitor Team Member usage of e-mail and the Internet.

SECTION 3: 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.**

Tyson Foods' Core Values reinforce the company's deep-seated commitment to produce trusted food products. All Tyson Team Members are expected to act responsibly in the workplace and comply with all applicable laws, regulations, and policies for food safety, animal welfare, the environment, and Team Member safety.

Food Safety

The safety of Tyson Foods' products is of critical importance to the company and its customers. Food safety is, and will remain, one of Tyson Foods' top priorities. Failure to adhere to the company's policies and government regulations may affect the quality or wholesomeness of its products and subject Tyson to regulatory or legal issues, such as product recalls or criminal prosecutions.

Laws, regulations, and company-defined food safety policies are complex and frequently change, so seek advice or guidance as needed to ensure full compliance.

Every Tyson Team Member should immediately report any actual or suspected, accidental or intentional failure to comply with all applicable food safety laws, regulations, or company-defined policies to his or her supervisor, local Quality Assurance Department, or the Compliance Department at our World Headquarters in Springdale, Arkansas.

Animal Well-Being

Tyson Foods has a long-standing commitment to the well-being, proper handling, and humane slaughter of all the animals that are used in its food products. This is not only the right thing to do; it is also an important moral and ethical obligation the company owes to suppliers, customers, Team Members, and most of all, the animals the company depends on for its products and livelihood.

Team Members are expected to respect and serve as stewards of the animals the company works with every day, treating them in a proper manner at all times.

Environment

Tyson Foods has established an Office of Animal Well-Being to advise Team Members regarding animal welfare issues. Team Members should immediately report any actual or suspected, accidental or intentional mistreatment of animals within the company's control to his or her supervisor, the Office of Animal Well-Being, or the Compliance Department, both of which are located at our World Headquarters in Springdale, Arkansas.

Environmental stewardship is a Core Value of Tyson Foods' business philosophy because the company believes protecting natural resources is essential to achieving clean air, water, and land for our world. All Team Members are required to perform work in an environmentally responsible manner. This includes minimizing water usage, practicing proper housekeeping, and ensuring wastes are stored and disposed of properly. Tyson Foods holds its Team Members accountable for managing all operations in an environmentally responsible manner so as to meet or exceed environmental laws and regulations.

There are many laws, rules, and regulations, and company policies covering environmental compliance, so seek advice or guidance as needed from the Corporate Environmental Health and Safety Services Group. Every Team Member should immediately report any actual or suspected, accidental or intentional failure to comply with environmental laws, regulations, or company-defined policies to his or her supervisor, the Environmental Health and Safety Services Group, or the Compliance Department, both of which are located at our World Headquarters in Springdale, Arkansas.

Everyone has the right to a safe and healthy workplace. In order for Tyson Foods to make this happen, all Team Members, contractors, vendors, and visitors must take ownership of making the Company's work environment as safe and healthy as possible. Team Members can do this by actively participating in safety and health training activities, using all provided personal protective equipment, familiarizing themselves with and following all established safety and health rules and procedures, and encouraging others to do the same.

It is extremely important to the success of the Company's safety and health programs for Team Members to promptly report any concern or condition that may pose a safety or health hazard to their supervisor or the Environmental Health and Safety Services Group. Speak up if you observe unsafe behavior — do not allow anyone to ignore established safety practices or procedures. If Team Members have questions about safety or health policies or procedures, they should contact their supervisor, local Safety Department, Occupational Health Services Department or the Compliance Department, both of which are located at our World Headquarters in Springdale, Arkansas.

SECTION 4: 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.**

Regulatory Compliance

There are numerous laws and regulations that Tyson Foods and its Team Members must observe and obey. The Company's dealings with all levels of governmental or foreign officials must comply with all applicable laws and regulations, and they should be free from even the appearance of wrongdoing. Team Members should adhere to the highest ethical standards of conduct when dealing with government personnel. If you ever receive any inquiry for information from a government or foreign agency, contact the group vice president of International or the Legal Department at our World Headquarters in Springdale, Arkansas.

Restricted Political Activities

The following political activities may be restricted and may not be undertaken without the approval of the senior vice president of External Relations or the office of general counsel:

- **Time:** Tyson Team Members' use of their work time or other Tyson Team Members' work time for personal political activities.
- **Assets:** Tyson Team Members' use of company assets for personal political purposes. For example, Team Members may not use Tyson vehicles or lodging facilities for political committees, campaigns, or candidates when engaged in personal political activities.
- **Funds:** The use of Tyson funds for political activities.

Team Members may not use their company position to coerce contributions or other forms of support from other Team Members or third parties for the purpose of supporting a charity, political candidate, political party, or political action committee.

Gifts, Gratuities, and Entertainment

Team Members may direct political contributions of their own money in accordance with applicable law, but such contributions may not be made in the name of Tyson Foods. No political contributions made by a Team Member may be reimbursed through Tyson Foods, and no indirect contributions may be made through suppliers, customers, or agents.

Each country has a different standard as to the acceptability and appropriateness of giving and receiving of gifts, gratuities, and entertainment. In many countries, it is a customary practice to entertain or give/accept gifts or gratuities to/from customers and clients. Sometimes, however, the entertainment, gift, or gratuity may be construed as a conflict of interest.

Gifts and gratuities of more than \$50 USD must be communicated to and approved by the senior or group vice president of International before it is presented or accepted. Only those gifts of nominal value (less than \$50 USD), or a gift of promotional value (for example, a gift of advertising or promotional nature with a company logo), may be accepted or given.

Entertainment that could appear excessive or could appear to influence a business decision should be approved in advance by the senior or group vice president of International. All entertainment expenses should be consistent with the company's Core Values and this Code of Conduct.

Team Members and their immediate families may not accept gifts of money (cash, checks, gift certificates, or gift cards) from any Tyson Foods supplier, vendor, or customer under any circumstances, no matter the value. Consult with the Compliance Department or the Legal Department both located at our World Headquarters in Springdale, Arkansas, to obtain specific guidance in your particular country regarding gifts and gratuities.

International Business Practices

There are many anticorruption, antitrust, and anticompetition laws and regulations governing our actions and interactions intended to curb dishonesty in international dealings. Compliance with local and international law is each Team Member's duty and responsibility.

Because we are a publicly traded company based in the United States, the Foreign Corrupt Practices Act (FCPA) is an important U.S. law specifically governing our actions and interactions regardless of geographical location. Team Members must fully comply with the anti-bribery provisions found within this law and make good faith efforts to maintain accurate records and internal controls to avoid potential violations. Additional guidance can be found in the FCPA Handbook, a specific FCPA resource available to Team Members. Consult with the Legal Department at our World Headquarters in Springdale, Arkansas, to get a copy of this resource or obtain specific guidance in your particular country regarding local anticorruption, antitrust, and anticompetition laws and regulations.

Bribes, Kickbacks, or Payoffs

The FCPA and other local laws prohibit the payment of any money or giving of anything of value to a foreign official, foreign political party (or official), or any candidate for foreign political office for purposes of obtaining, retaining, or directing of business. Always consult with the Legal Department to obtain specific guidance in your particular country regarding local antibribery laws and regulations.

Facilitating Payments

The FCPA may allow, depending on local law, "facilitating payments," such as payments for processing governmental papers, obtaining phone service, securing required permits, or obtaining adequate police protection. Although Tyson Foods' policy does not prohibit such payments if allowed by local law, Team Members must seek advice in advance from the Legal Department in all cases where facilitating payments may be involved. Any such facilitating payment must be approved in advance by the Legal Department at our World Headquarters in Springdale, Arkansas, and properly accounted for in Tyson Foods' records.

Export Restrictions

Federal agencies administer a variety of embargoes and sanctions programs against a number of countries, as well as nationals of those countries, because of activities deemed contrary to the interests of the United States and its allies. Transactions with certain designated individuals and organizations, such as terrorist organizations, narcotics traffickers, and weapons proliferators, are also prohibited, even though those individuals or organizations may not be associated with any particular country's embargo. Severe civil and/or criminal penalties may be levied against companies or individuals that violate U.S. export controls. Always consult with the Legal Department at our World Headquarters in Springdale, Arkansas, prior to entering into international trade negotiations.

Restrictive Trade Practices and Boycotts

Team Members must not participate in any activity, including those fostered by foreign countries or organizations, intended to restrain trade or promote a boycott of customers or suppliers located in a country friendly to the United States, or of U.S. persons, firms, or corporations. If a Team Member receives or learns of a boycott request or a related information request, it must be reported to his or her supervisor and to the Legal Department at our World Headquarters in Springdale, Arkansas.

A Final Thought

Tyson Foods believes that the integrity each Team Member brings to his or her position will enable the company to set the standard for business conduct in the agribusiness industry. This Code of Conduct has been written to set formal expectations that each Team Member must meet in observing and respecting the laws that govern the company's business. Tyson will continue to endorse a corporate compliance program that will assist Team Members in achieving this goal. If Team Members have questions or concerns about conduct or about provisions of this Code of Conduct, they should bring them promptly to the attention of the Compliance Department. Remember that the provisions of this Code of Conduct are fully binding, without exception, as long as you are a Tyson Team Member. In addition, the provisions in this Code of Conduct protecting the company's confidential and proprietary information continue to be binding upon those persons who leave Tyson Foods' employment, either voluntarily or involuntarily.



Tyson Foods, Inc.