

Smithfield

SLAVERY AND HUMAN TRAFFICKING DISCLOSURE

Smithfield Foods, Inc., is committed to the protection and advancement of human rights, as enshrined in the Universal Declaration of Human Rights (UDHR) issued by the General Assembly of the United Nations on December 10, 1948. Smithfield Foods and its employees adhere to the Smithfield Human Rights Policy (our “Policy”), which is grounded in the Smithfield Code of Business Conduct (our “Code of Conduct”). A primary tenet of our Policy is “Smithfield Foods does not use forced or compulsory labor.”

Effective January 1, 2012, the California Transparency in Supply Chains Act of 2010 requires Smithfield Foods to make the following disclosure as to our efforts to eradicate slavery and human trafficking from our direct supply chain:

- **Verification of Supply Chain.** Smithfield Foods has been preparing a code of conduct for our suppliers (our “Supplier Code”). A primary tenet of that code will be adherence to all relevant laws and regulations, including those addressing slavery and human trafficking. We will update this disclosure once our supplier code of conduct is in effect.
- **Audit.** Smithfield Foods does not currently conduct audits of suppliers to evaluate supplier compliance with company standards against trafficking and slavery in supply chains.
- **Supplier Certification.** Once our Supplier Code is in effect, our suppliers will be required to certify compliance with our Supplier Code.
- **Accountability.** Smithfield Foods is committed to ethical and socially responsible conduct in the workplace. Upon hire, Smithfield Foods requires all employees to read and acknowledge receipt and understanding of our Code of Conduct. Employees re-certify this acknowledgement annually. Our Code of Conduct includes, among other things, certification that the employee will comply with all applicable laws and regulations. Human trafficking and slavery is a violation of such laws, and would constitute a violation of our Code of Conduct. Such a violation could result in disciplinary action against the employee, including termination.
- **Training.** As noted above, Smithfield Foods requires annual certification from our employees that they understand and will adhere to our Code of Conduct. We do not conduct specific training at this time on our Code of Conduct or on our Policy.