



**CODE OF  
CONDUCT AND ETHICS**

# LETTER FROM THE CEO

Pilgrim's is adopting this Code of Conduct and Ethics with the objective of directing its Team Members and business everywhere it operates. This code is comprehensive, but its purpose is simple: Everyone must act ethically, always doing the right thing, regardless of the situation, as well as work transparently and honestly, in compliance with the law in every action and decision. This means that Pilgrim's does not tolerate illegal or unethical dealings, regardless of where or why.

Acting ethically provides a competitive advantage, which may be compromised by a single illegal or unethical act. Each Team Member is responsible for learning, practicing, influencing and teaching the highest ethical behavior at Pilgrim's and in the communities where the Company operates.

Reading and understanding the Code of Conduct and Ethics is just the beginning. All Team Members are urged to read and comply with the policies applicable to their roles and report any concerns to the appropriate channels. In addition, all Team Members should question themselves about ethical behaviors in every step or activity of their daily lives, since we are all guardians of the Pilgrim's ethical conduct.

Creating a work environment with the highest ethical standards is one of the main elements to achieve success, and the conduct of each Team Member, in each action, is essential to the Company's achievements, in addition to contributing to and promoting socioeconomic development in the markets where Pilgrim's operates.

**Fabio Sandri**

*Pilgrim's CEO*



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# 1 INTRODUCTION



**Pilgrim's Pride Corporation ("Pilgrim's") is committed**

to conducting business ethically, with integrity and in compliance with applicable laws. All Team Members must comply with the Code of Conduct and Ethics ("Code") and behave in line with the Mission and Values of Pilgrim's.

## 1.1 OUR MISSION AND VALUES

**Mission:** “To be the best in all that we do, completely focused on our business, ensuring the best products and services to our customers, a relationship of trust with our suppliers, profitability for our shareholders and the opportunity of a better future for all of our team members”

**VALUES:**

**Availability | Determination | Discipline | Humility**  
**Ownership | Sincerity | Simplicity**

## 1.2 DEFINITIONS

**Misconduct** – Any actual or suspected violation of this Code; Pilgrim’s policies, procedures and processes; or applicable laws or regulations.

**Pilgrim’s** – Consists of Pilgrim’s Pride Corporation. and all of its subsidiaries worldwide.

**Leader** or **Leaders** – Any Team Member responsible for supervising the business activities of Pilgrim’s or other Team Members, including the members of the Board of Directors.

**Team Member** or **Team Members** – All Pilgrim’s employees, including employees hired for a fixed term and at-will employees, as well as interns.

## 1.3 SCOPE OF APPLICATION

This Code applies to all Pilgrim’s Team Members and Leaders.

Pilgrim’s will encourage the publicly held companies under its control to implement

a Code of Conduct and Ethics that at least incorporates the standards established herein.



## 1.4 RESPONSIBILITIES OF TEAM MEMBERS

### All Team Members shall:

- (a) Act ethically
- (b) Read, understand and comply with the Code
- (c) Comply with all applicable laws and regulations
- (d) Understand the policies, procedures and processes applicable to their activities
- (e) Attend training and obtain the necessary certifications

### Responsibilities of Leaders

In addition to their responsibilities as Team Members, Leaders are responsible for creating an environment that promotes compliance with this Code. Leaders must lead by example, being responsible for encouraging their teams to engage with compliance with the guidelines of this Code, demonstrating with conviction the correct application of this Code and

Pilgrim's policies. Monitoring the Team Members' integrity is as important as monitoring their performance. Leaders must also promote an environment where Team Members are encouraged to express opposing views and ask for guidance and support on this Code, Pilgrim's policies and ethical behaviors.

# LEADERS MUST, AT LEAST:

- ✓ Demonstrate by words and deed that ethics are paramount
- ✓ Lead by example
- ✓ Ensure that ethics always prevail, even if they conflict with a business goal or objective
- ✓ Ensure open communication by encouraging Team Members to ask questions about this Code and the Company's Mission and Values
- ✓ Educate Team Members on the guidelines of the Code to prevent unethical behavior
- ✓ Upon becoming aware of Misconduct, immediately contact Compliance, Legal or Human Resources (as applicable) and work in good faith with such departments in investigating the same
- ✓ Recognize Team Members who report possible Misconduct as champions of this Code and the Company's Mission and Values
- ✓ Avoid any form of retaliation against those who report possible Misconduct or assist in investigations
- ✓ Encourage Team Members to report violations, even if they are involved. If any Team Member self-reports, this act may be taken into account in the disciplinary process.



## 1.5 PENALTIES FOR VIOLATIONS

Pilgrim's will not tolerate violations of this Code. Failure to comply with this Code or Pilgrim's policies may result in

disciplinary action, which may include termination of the employment contract and other consequences, as permitted by law.

## 1.6 REPORTING POSSIBLE MISCONDUCT

If Team Members have questions about this Code or are aware of possible misconducts, they must contact a Leader or the Compliance, Legal or Human Resources area.

The reporting of concerns or complaints is an essential part of the Pilgrim's Compliance program. Pilgrim's wants to know all its Team Members' concerns in order to be able to appropriately address them. If a Team Member is aware of or suspects a violation of this Code, Pilgrim's policies or the law, he/she must immediately report these concerns, unless prohibited by law. It is not necessary to know whether a specific action is a violation, but it is necessary to raise concerns and report any situation that could represent a violation. Team Members should not delegate the task of reporting

these concerns to others. Nothing in this Code prevents Team Members from reporting potential violations of the law to government officials.

Pilgrim's supports and protects its Team Members who report concerns in good faith. These reports will be treated confidentially and may be anonymous. Pilgrim's will ensure the confidentiality of Team Members' reports, except to the extent necessary to investigate the matter. Team Members can report concerns without fear of retaliation. Retaliation against any individual who reports a possible breach of conduct sincerely and in good faith or who participates in an investigation is strictly prohibited.

**See Appendix A** for information on accessing the Pilgrim's Hotline Channel.





## **2** EMPLOYMENT PRACTICES AND WORK ENVIRONMENT



**Pilgrim's employment practices**

are guided by the commitment to ensure the safety of all Team Members and treat them respectfully, in compliance with applicable laws and regulations.

## **2.1 HEALTH AND SAFETY**

Pilgrim's is committed to providing a safe work environment. Each Team Member is responsible for observing the safety rules that apply to his/her job. Team Members are also responsible for taking the necessary precautions to protect themselves and their colleagues, as well as immediately reporting accidents, injuries and unsafe practices or conditions. For more information on Health and Safety,

please see the policies applicable to your region.

Pilgrim's is also committed to providing a workplace free from risks associated with the use of drugs and alcohol. Team Members must work free from any substance that could impair their performance or compromise safety in the workplace.

## **2.2 EQUAL EMPLOYMENT OPPORTUNITIES AND DIVERSITY IN THE WORKPLACE**

Pilgrim's is committed to guaranteeing that all candidates and Team Members have equal employment opportunities, regardless of race, color, ethnicity, nationality, age, veteran status, gender, religion, disability, sexual orientation or any other status protected by law. Pilgrim's also develops and retains a diverse and inclusive workforce, recognizing that a diverse mix of backgrounds, skills and experiences maximizes our ability to

achieve our goals and provides us with a sustained competitive advantage.

Pilgrim's will ensure that only legitimate job-related requirements and procedures are used in recruitment, selection, promotion, transfer and disciplinary measures, including termination, compensation, benefits, classification, dismissal, training and educational programs.

## **2.3 HARASSMENT**

Pilgrim's is committed to providing a workplace free from violence and moral and sexual harassment. Pilgrim's will not tolerate harassment of its Team Members. Harassment covers a wide range of

offensive behaviors, whether verbal, written or physical. Such behaviors create an intimidating and hostile work environment, in addition to interfering with an individual's work performance.



## 2.4 WORK-LIFE BALANCE, LABOR AND IMMIGRATION RULES

Pilgrim's complies with all labor laws. Team Members must never request that other Team Members or third parties violate these laws (e.g., ask a Team Member to work unpaid overtime).

Pilgrim's recognizes the right of Team Members to participate in the political process or any associations as individuals. However, Team Members may only engage in such activities on their own time and at

their own expense. Team Members must not use Pilgrim's time, resources, facilities or assets for such purpose, as well as the Company's name, without express written permission.

Pilgrim's is also committed to hiring only individuals who are legally authorized to work in the country where they are seeking employment.

## 2.5 HUMAN RIGHTS

Pilgrim's forbids the use of child or forced labor and will not tolerate the exploitation of children, physical punishment, any form of abuse or servitude.

All are equal before the law and, without distinction, are entitled to equal protection against any discrimination or incitement that violates the Universal Declaration of Human Rights.





# 3 BUSINESS PRACTICES



**Team Members must conduct business**

with customers, suppliers and competitors in an ethical, fair and transparent manner.

### **3.1 FOOD SAFETY**

Pilgrim's is committed to providing the highest quality products to its customers. Food safety throughout the production process is a top priority. Pilgrim's has implemented effective processes to measure

and record process performance and product quality standards, and, when appropriate, it takes effective preventive or corrective measures to ensure this standard.

### **3.2 ENVIRONMENT AND SUSTAINABILITY**

Pilgrim's complies with all applicable environmental laws and is committed to supporting the economic, social and cultural development of the areas where it operates.

All Team Members must respect the environment and responsibly use resources, including water, paper and energy, without waste, and act with social and environmental responsibility.

### **3.3 ANIMAL WELFARE**

Pilgrim's respects animal welfare, ensuring proper handling and humane slaughter of all the animals used in its products, as required by law and best market practices.

All Team Members must perform their duties in compliance with environmental and humane animal handling laws and regulations.

### **3.4 CONFLICT OF INTEREST**

Team Members must act in the best interest of Pilgrim's. A conflict of interest can arise anytime the personal or professional interests of an individual or group of Team Members is at odds with the best interests

of Pilgrim's.

Team Members must report any and all potential conflicts of interest of which they may be aware.

### **3.5 RELATED PARTIES**

Related Parties are individuals or legal entities that directly or indirectly control or are under the control of Pilgrim's, or have influence over Pilgrim's. The relationship between related parties is common for doing business and for business strategy; however, it is necessary to observe the limits imposed by local legislation, avoiding any

conflicts of interest and losses to Pilgrim's.

Transactions with related parties must follow market conditions, carried out with transparency and always in the best interest of Pilgrim's. Transactions with related parties are subject to policies, procedures and additional approvals.



### **3.6 ANTI-CORRUPTION PRACTICES**

Pilgrim's has zero tolerance for any form of bribery or corruption. Bribery and corruption involve receiving, providing, offering or promising to provide, directly or through third parties, anything of value to

public or private entities for the purpose of unduly influencing their acts or obtaining an undue advantage. Pilgrim's prohibits anyone acting on its behalf from making or receiving bribes or improper payments.

### **3.7 GIFTS AND ENTERTAINMENT**

The giving of corporate gifts and providing entertainment for legitimate business purposes must be reasonable and comply with Pilgrim's policies. Gifts in cash or cash equivalents are not permitted. Gifts and entertainment involving public agents are subject to policies, procedures and additional approvals.

Team Members must not accept a gift if they believe it was offered for the purpose of influencing a business decision or may in fact influence it. For more information on gifts and entertainment, please see the local policies applicable to your region.

### **3.8 POLITICAL CONTRIBUTIONS**

Donations to politicians and political parties on behalf of Pilgrim's are allowed only

in compliance with local laws.

### **3.9 CHARITABLE DONATIONS AND SPONSORSHIPS**

Charitable donations to non-profit institutions and Team Members are allowed under limited circumstances, respecting the policies applicable to the region.

Donations and sponsorships that involve public agencies must comply with local laws and be previously approved by the Compliance area.

### **3.10 RELATIONSHIP WITH THE GOVERNMENT**

Pilgrim's operates transparently in its interaction with public agents. Team Members must avoid any interaction that may create the appearance of impropriety or illegality. Fraud of any kind is strictly forbidden. Payments to government officials or authorities are prohibited unless approved in writing by the Compliance area.

Pilgrim's fully cooperates with national or foreign inspection authorities everywhere it operates. Team Members must never obstruct the action, inspection or investigation of any authority and must fully cooperate with their activities as provided by law. If any Team Member receives a notification from or is contacted by a government agency, he/she must to immediately notify the Legal Department.



TAKE THE TIME  
TO LOCK IT OUT!  
SAFETY  
LASTS  
A LIFETIME

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BIRCH

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ALL NATURAL BONELESS SKINLESS

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ALL NATURAL BONELESS SKINLESS

Safe Handling Instructions

### **3.11 HIRING OF PUBLIC AGENTS**

Pilgrim's may only hire an actual or former public agent or civil servant, or persons related to them, after duly verifying that the

engagement is permitted by law and does not appear to be for an improper purpose.

### **3.12 RELATIONSHIP WITH UNIONS**

Pilgrim's respects the rights of Team Members to bargain collectively and form or join a union. Management of union relations includes the willingness to dialogue

and transparent negotiations, always based on mutual respect, compliance with local law and the guidelines of ethics and integrity in this Code.

### **3.13 ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM**

Pilgrim's complies with all applicable anti-money laundering laws and reporting requirements. Money laundering is an attempt by individuals or organizations to hide the proceeds of their crimes by making those proceeds look legitimate. Pilgrim's also complies with regulations to

combat the financing of terrorism, defined as an act aimed at creating social terror or endangering people, property and public peace.

Team Members must be alert at all times for suspicious activity with such purposes.

### **3.14 INTERNATIONAL TRADE CONTROLS**

Pilgrim's complies with all laws relating to international trade, including economic sanctions and embargoes, which restrict or prohibit trade and transactions with

certain countries, organizations, entities and individuals. Team Members must take steps to make sure that international transactions are not prohibited by said embargoes.

### **3.15 BOOKS AND RECORDS**

Pilgrim's maintains transparent, accurate and complete accounting and financial records in compliance with the law, applicable accounting standards, internal

controls and accounting policies. False, misleading or incomplete accounting records are strictly prohibited.



### **3.16 TRADE CONTROLS**

Pilgrim's is committed to a policy of lawful competition based on the merits of our products and services. We seek to satisfy our customers' needs rather than limit our competitors' opportunities.

Team Members must not engage in any

conduct that may compromise free and fair competition, such as arrangements with other companies or manipulation of bidding processes. Team Members must not offer, request or exchange information with a competitor about prices, proposals, market share or other relevant information.

### **3.17 USE OF COMPANY PROPERTY AND ELECTRONIC COMMUNICATIONS**

Pilgrim's allows its Team Members to use its property, including credit cards, equipment, electronic devices and information technology systems, for legitimate business purposes only. Pilgrim's reserves the right to inspect, monitor and control the use of its property at any time, including e mail systems and other forms of electronic communication.

Any information generated, received or stored in one of these systems is property of Pilgrim's, and Team Members should not expect privacy when using them.

Team Members are prohibited from using Pilgrim's property to share content that is inappropriate or not related to the Company's interests.

### **3.18 USE OF INSIDER INFORMATION**

While working at Pilgrim's, Team Members may have access to non-public information that may influence decisions to buy or sell certain securities. Team Members who have access to such information must not disclose it or trade any securities issued by

Pilgrim's or any other securities whose prices may be affected by such information. For more information, please see the policies applicable to your region.

### **3.19 USE OF CONFIDENTIAL INFORMATION AND DATA PROTECTION**

All Team Members must ensure the protection of non-public information to which they may have access while working at Pilgrim's. Such information may include details of the organization, prices, profits, suppliers and customer or employee data, among others. Confidential information can only be shared with people outside the Company in accordance with Pilgrim's

internal policies and applicable laws.

Specifically regarding personal data, Pilgrim's respects the privacy of its Team Members, customers, suppliers and other third parties, using the data obtained for legitimate business purposes only, always observing applicable laws and related policies.

### **3.20 INTELLECTUAL PROPERTY**

Team Members must protect the Intellectual Property (IP) of Pilgrim's and third parties, including copyrights, patents, trademarks and trade secrets. To the extent permitted by law, Pilgrim's owns the rights to all

IP arising from the activities of Team Members while they are employed by Pilgrim's. Team Members must not use this IP in a manner that is inconsistent with the property rights of Pilgrim's.

### **3.21 COMMUNICATION WITH THE MEDIA**

Pilgrim's is committed to making transparent, accurate and truthful communications to the public. Team Members must not

interact with the media or speak on behalf of Pilgrim's unless previously approved in accordance with applicable policies.



# APPENDIX A

## PILGRIM'S ETHICS LINE CONTACTS



### **AUSTRALIA**

1-800-270-824

### **BELGIUM**

0800-666-1659

### **CANADA**

0800-666-1659

### **CHINA**

Southern: 10-811

Northern: 108-888

### **CZECH REPUBLIC**

00-800-222-552881659

### **FRANCE**

0800-91-6908

### **GERMANY**

0-800-225-5288

### **MEXICO**

001-800-462-4240

### **NETHERLANDS**

08000201706

### **NEW ZEALAND**

0508-868-976

### **UNITED KINGDOM**

0808-234-9445

### **UNITED STATES**

1-888-536-1510



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