



# CODE OF CONDUCT AND ETHICS





CODE OF  
**CONDUCT**  
**AND ETHICS**



# LETTER FROM THE CEO

Pilgrim's Pride Corporation (PPC) 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 PPC 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 PPC 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 PPC'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 PPC operates.

## **Fabio Sandri**

Pilgrim's President and  
Global CEO

**TABLE OF CONTENTS**

# TABLE OF CONTENTS

<b>1. INTRODUCTION .....</b>	<b>7</b>
<b>1.1 Our Vision, Strategy, Methods &amp; Values .....</b>	<b>8</b>
<b>1.2 Definitions .....</b>	<b>9</b>
<b>1.3 Scope of Application .....</b>	<b>9</b>
<b>1.4 Responsibilities of Team Members.....</b>	<b>10</b>
<b>1.5 Penalties for Violations .....</b>	<b>12</b>
<b>1.6 Reporting Possible Misconduct .....</b>	<b>12</b>
<b>2. EMPLOYMENT PRACTICES AND WORK ENVIRONMENT .....</b>	<b>14</b>
<b>2.1 Health and Safety .....</b>	<b>15</b>
<b>2.2 Equal Employment Opportunities and Diversity in the Workplace .....</b>	<b>15</b>
<b>2.3 Harassment .....</b>	<b>16</b>

<b>2.4</b>	<b>Balance at Work and Labor and Immigration Rules .....</b>	<b>17</b>
<b>2.5</b>	<b>Human Rights .....</b>	<b>17</b>
<b>3.</b>	<b>BUSINESS PRACTICES .....</b>	<b>18</b>
<b>3.1</b>	<b>Food Safety .....</b>	<b>19</b>
<b>3.2</b>	<b>Environment and Sustainability .....</b>	<b>19</b>
<b>3.3</b>	<b>Animal Welfare .....</b>	<b>20</b>
<b>3.4</b>	<b>Conflict of Interest .....</b>	<b>20</b>
<b>3.5</b>	<b>Related Parties .....</b>	<b>20</b>
<b>3.6</b>	<b>Anti-Corruption Practices .....</b>	<b>21</b>
<b>3.7</b>	<b>Gifts and Entertainment .....</b>	<b>22</b>
<b>3.8</b>	<b>Political Contributions .....</b>	<b>22</b>
<b>3.9</b>	<b>Charitable Donations and Sponsorships .....</b>	<b>23</b>
<b>3.10</b>	<b>Relationship with the Government .....</b>	<b>23</b>
<b>3.11</b>	<b>Hiring of Public Agents .....</b>	<b>24</b>

<b>3.12</b> Relationship with Unions .....	<b>24</b>
<b>3.13</b> Anti-Money Laundering and Combating the Financing of Terrorism .....	<b>24</b>
<b>3.14</b> International Trade Controls .....	<b>25</b>
<b>3.15</b> Books and Records .....	<b>25</b>
<b>3.16</b> Antitrust and Competition .....	<b>26</b>
<b>3.17</b> Use of Company Property and Electronic Communications .....	<b>26</b>
<b>3.18</b> Use of Insider Information .....	<b>27</b>
<b>3.19</b> Use of Confidential Information and Data Protection .....	<b>27</b>
<b>3.20</b> Intellectual Property .....	<b>28</b>
<b>3.21</b> Communication with the Media .....	<b>28</b>
<b>APPENDIX A – PPC ETHICS LINE CONTACTS</b> .....	<b>29</b>



# 1. INTRODUCTION

Pilgrim's Pride Corporation ("Pilgrim's" or "PPC") is committed to conducting business ethically, with integrity, and in compliance with applicable laws. All Team Members are encouraged to use Pilgrim's Vision, Strategy, Methods and this Code of conduct and Ethics (the "Code") to guide them in their work for Pilgrim's.

**TABLE OF CONTENTS**



# 1.1 OUR VISION, STRATEGY, METHODS & VALUES



## VISION

“To become the BEST and MOST RESPECTED Company in our industry, creating opportunities for a better future for our team members.”



## STRATEGY

- ✓ Become a more valued partner with our key customers.
- ✓ Relentless pursuit of operational excellence.
- ✓ Unique portfolio of diverse, complementary business models.
- ✓ Safe workplace environment, safe people, safe products and healthy attitudes.



## METHODS

- ✓ Drive ownership & accountability into every level of our Company.
- ✓ Relentlessly pursue the root cause of issues.
- ✓ Make decisions based on knowledge, facts, and data rather than experience.
- ✓ Create growth & development opportunities that help our team members succeed.



## VALUES

- |                        |                     |
|------------------------|---------------------|
| ✓ <b>Ownership</b>     | ✓ <b>Simplicity</b> |
| ✓ <b>Determination</b> | ✓ <b>Sincerity</b>  |
| ✓ <b>Discipline</b>    | ✓ <b>Humility</b>   |
| ✓ <b>Availability</b>  |                     |





## 1.2 DEFINITIONS

“Misconduct” means any actual or suspected violation of this Code; PPC policies, procedures and processes; or applicable laws or regulations.

“Pilgrim’s” consists of Pilgrim’s Pride Corporation and all of its subsidiaries (entities directly or indirectly controlled by PPC) worldwide, except for publicly held companies controlled by PPC.

“Leader” or “Leaders” means any Team Member responsible for supervising the business activities of PPC or other Team Members, including the members of the Board of Directors.

“Team Member” or “Team Members” refers to all PPC 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 PPC Team Members and Leaders.

PPC 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 must (a) act ethically; (b) read, understand and comply with this Code; (c) comply with all applicable laws and regulations; (d) understand the policies, procedures and processes applicable to their activities; and (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 PPC 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, PPC policies and ethical behaviors.



## Leaders must, at least:

- Demonstrate by words and deeds that ethics is paramount;
- Lead by example;
- Ensure that ethics always prevails, even if it conflicts with a business goal or objective;
- Ensure open communication, encouraging Team Members to ask questions about this Code and the Company's Mission and Values;
- Disseminate the guidelines of the Code to prevent unethical behaviors;
- Upon becoming aware of Misconduct, immediately contact the Compliance, Legal or Human Resources Department (as applicable) and work in good faith with such departments in case of investigation;
- 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; and
- 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**

PPC will not tolerate violations of this Code. Failure to comply with this Code or PPC 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 Misconduct, they must contact a Leader or the Compliance, Legal or Human Resources Department.

The reporting of concerns or complaints is an essential part of PPC Compliance program. PPC 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 of a violation of this Code, PPC 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.

PPC supports and protects its Team Members who report concerns in good faith. These reports will be treated confidentially and may be anonymous. PPC 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 PPC Ethics Line.



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

PPC 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.

**TABLE OF CONTENTS**



## **2.1 HEALTH AND SAFETY**

PPC 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.

PPC 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**

PPC is committed to guaranteeing that all candidates and Team Members have equal employment opportunities, regardless of race, color, ethnicity, nationality, age, gender,



religion, disability, veteran status or any other status protected by law. PPC 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.

PPC 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**

PPC is committed to providing a workplace free from violence, bullying and sexual harassment. PPC 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

# BALANCE AT WORK AND LABOR AND IMMIGRATION RULES

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

PPC 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 PPC's time, resources, facilities or assets for such purpose, as well as the Company's name, without express written permission.

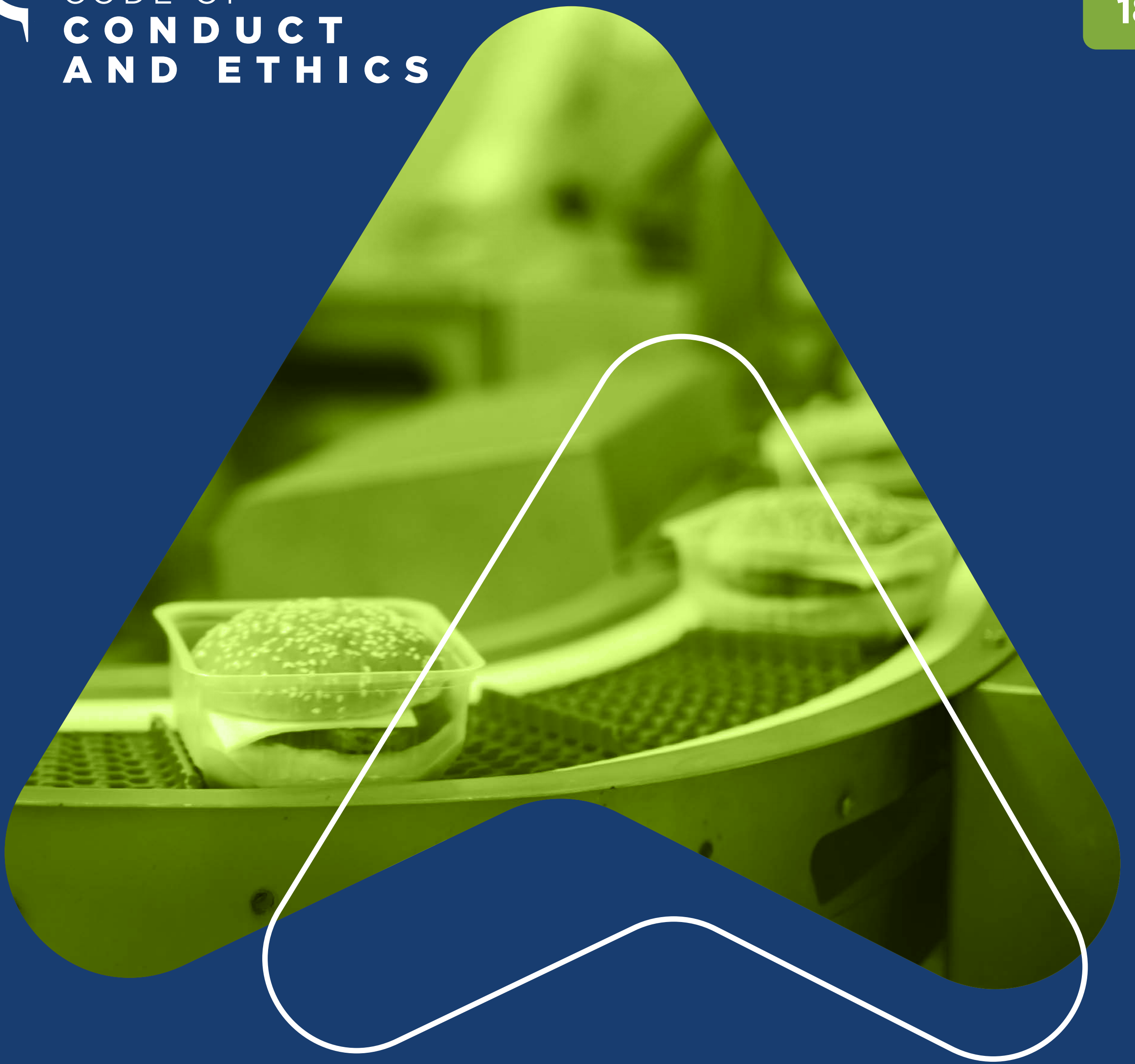
PPC is also committed to hiring only individuals who are legally authorized to work in the country where they are seeking employment.

## 2.5

# HUMAN RIGHTS

PPC forbids the use of child or forced labor and will not tolerate the exploitation of children, physical punishment, any form of abuse or slavery.

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.

**TABLE OF CONTENTS**



## **3.1 FOOD SAFETY**

PPC is committed to providing the highest quality products to its customers. Food safety throughout the production process is a top priority. PPC 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**

PPC 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**

PPC 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 PPC. 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 PPC.

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 PPC, or have influence over PPC. 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 PPC.

Transactions with related parties must be consistent with market conditions, carried out with transparency and always in the best interest of PPC. Transactions with related parties are subject to policies, procedures and additional approvals.

## **3.6 ANTI-CORRUPTION PRACTICES**

PPC 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. PPC 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 PPC 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 PPC are allowed only in compliance with local laws and upon a decision supported by the PPC Ethics Committee.



## **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 Department.

## **3.10 RELATIONSHIP WITH THE GOVERNMENT**

PPC 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 Department.

PPC 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 notification from or is contacted by a government agency, he/she has to immediately notify the Legal Department.



## **3.11 HIRING OF PUBLIC AGENTS**

PPC 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**

PPC 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**

PPC 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. PPC 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**

PPC 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**

PPC 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****ANTITRUST AND  
COMPETITION**

PPC 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**

PPC allows its Team Members to use its property, including credit cards, equipment, electronic devices and information technology systems, for legitimate business purposes only. PPC 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 PPC, and Team Members should not expect privacy when using them.



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

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

While working at PPC, 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 PPC 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 PPC. 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 PPC's internal policies and applicable laws.

Specifically regarding personal data, PPC 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 PPC and third parties, including copyrights, patents, trademarks and trade secrets. To the extent permitted by law, PPC owns the rights to all IP arising from the activities of Team Members while they are employed by PPC. Team Members must not use this IP in a manner that is inconsistent with PPC's property rights.

## **3.21 COMMUNICATION WITH THE MEDIA**

PPC 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 PPC unless previously approved in accordance with applicable policies.

# PILGRIM'S ETHICS LINE CONTACTS

## COMPLIANCE PILGRIM'S PILGRIM'S ETHICS LINE

### NORTH AMERICA

United States

1 (800) 492-3981

Mexico

800.681.6945

### EUROPE

United Kingdom

0-(808)-189-1053

France

805.080339

Netherlands

0.800.022.0441

Ireland

1 800-904-177

You can also make a web-based report at  
[pilgrimsethicsline.pilgrims.com](http://pilgrimsethicsline.pilgrims.com)

TABLE OF CONTENTS



CODE OF  
**CONDUCT**  
**AND ETHICS**



**TABLE OF CONTENTS**