



## Policy Overview

At Tyson Foods, we remain firmly committed to our long-standing practice of competing vigorously, honestly, and in compliance with the letter and the spirit of the antitrust laws. We believe that competing fairly makes us better as a company by delivering greater value to our customers, consumers and shareholders, enhancing relationships with our supply chain partners and fostering a positive experience for our team members.

It is the responsibility of every Tyson team member to be familiar with antitrust principles, to recognize potential antitrust or anticompetitive concerns as they arise, and to maintain fully compliant business practices within their span of control, operation or execution. To aid our team members in this regard, our Global Antitrust Policy establishes the framework for complying with applicable antitrust laws. The Policy not only provides substantive written guidance to help team members identify potential anticompetitive conduct, practices and arrangements, it also mandates that team members receive regularly refreshed antitrust training through the Ethics and Compliance Department. In addition, the Policy provides guidance and instruction so that team members understand when and how to reach out to the Law Department for assistance in navigating potential antitrust issues.

## DOJ Guidance

The Policy specifically incorporates and emphasizes the United States Department of Justice Antitrust Division criteria for evaluating the effectiveness of an organization's antitrust compliance program. These factors include: the program's design and comprehensiveness; the company's culture of compliance; responsibility and dedicated resources for the program; risk assessment techniques utilized by compliance managers; compliance training and communication; continuous improvement of the program; reporting mechanisms; compliance incentives and discipline; and remediation methods.

## Antitrust Chief Counsel

In keeping with the DOJ Guidance, Tyson has dedicated a fulltime position within its Law Department to the role of Chief Counsel, Antitrust and Global Competition ("Antitrust Chief Counsel"). The position of Antitrust Chief Counsel is held by an attorney who is experienced in antitrust and global competition issues, serving in a cross-functional role with responsibility for conducting periodic antitrust risk assessments, serving as the resource from whom team members can seek legal guidance on potential antitrust issues, developing and delivering antitrust compliance training, and driving continuous improvement in our antitrust compliance program.

## Core Concepts

Tyson understands the importance of competing fairly and ethically and maintains the following specific policy statements:

**Collusion with Competitors:** Tyson does not tolerate any form of collusive conduct between its team members and employees of competitors. This would include impermissible conduct such as price fixing, bid rigging, output restrictions, allocations of customers or territories, and group boycotts.

**Improper Exchanges of Competitively Sensitive Information:** Tyson strictly limits the exchange of competitively sensitive information with third parties and specifically requires consultation and guidance from the Antitrust Chief Counsel before competitively sensitive information may be shared with a third party. Tyson does not tolerate improper exchanges of competitively sensitive information.

**Dealings with Customers/Suppliers:** Tyson does not tolerate any sort of tying arrangements or other forms of predatory pricing or sales conduct.



TYSON FOODS, INC.

## Global Antitrust Policy Statement



### Core Concepts *(cont.)*

**Human Resources and Compensation:** Tyson does not tolerate actions that attempt to fix wages or benefits or unlawful agreements to refrain from recruiting or hiring individuals employed by competitors (i.e., “no-poach agreements”).

### Reporting Potential Violations

Team members must report questionable activity or suspected antitrust violations. Concerns involving antitrust and competition law issues identified by team members must be brought to the attention of the Law Department/Ethics & Compliance. This can be done by contacting the Antitrust Chief Counsel or the Ethics & Compliance Department ([compliance@tyson.com](mailto:compliance@tyson.com)). Team members also have the option to use the Help Line or Web Line, which is operated by an independent third party and is available 24 hours a day, seven days a week in multiple languages with an option to remain anonymous. From inside the United States, a reporting party should dial 1-888-301-7304. Reporting parties may also use the internet Web Line at [tellysonfirst.com](http://tellysonfirst.com) from anywhere in the world.

### Penalties for Failure to Comply

Violations of this Policy may result in discipline up to and including termination of employment.