



POLITICAL CONTRIBUTIONS AND EXPENDITURES POLICY

DOCUMENT CONTACT NAME: MINA PATEL

DOCUMENT CONTACT TITLE: MGR GOVERNMENT AFFAIRS

BUSINESS AREA: ETHICS AND COMPLIANCE, LAW

PUBLICATION DATE: 04/11/2024

1.0 Purpose

1.1. Tyson Foods, Inc. (collectively with its subsidiaries, “Tyson Foods” or the “Company”) is committed to being a responsible corporate citizen, to ensuring compliance with the letter and spirit of the law, and to promoting disclosure and accountability regarding political contributions and expenditures.

2.0 Scope

2.1 This policy applies to all team members, directors, authorized agents or advisors, and consultants who (a) give or plan to give a donation or contribution to a political party, candidate, campaign, or any other entity for a political purpose on behalf of Tyson and/or (b) use or plan to use Tyson facilities to host political candidates or fundraising activities.

3.0 Policy Overview; Applicability

3.1 Political contributions aligned with the Company’s public policy objectives are made through the Tyson Foods, Inc. Political Action Committee (“TYPAC”), as well as through corporate contributions for state and local candidates in states where laws allow. As explained in Section 4.3 below, as a general practice, the Company does not engage in independent political expenditures. However, if the Company does so, it will disclose them on its corporate website, updated on a semi-annual basis, in accordance with Section 4.7.2 below.

3.2 The Company is committed to integrity in its conduct of all political engagements—including contributions—which take place in a transparent, legal, and ethical manner. This Political Contributions and Expenditures Policy (this “Policy”) supports the Company’s impact in public policy, educating public officials about our business, and facilitating team member contributions to political candidates through TYPAC, as well as through corporate contributions for state and local candidates in states where permitted by applicable law, all while complying with applicable laws and regulations governing political contributions or expenditures for federal, state, or local elections. *This Policy should be read in conjunction with the Company’s Global Giving Policy (the “Global Giving Policy”) and the Company’s Code of Conduct (the “Code of Conduct”).*

POLITICAL CONTRIBUTIONS AND EXPENDITURES POLICY

- 3.3 If you have questions regarding a potential political donation or proposed activity, please consult with Tyson’s Global Government Affairs, Tyson Ethics and Compliance, or the Tyson Law Department prior to proceeding.

4.0 Statements of Policy

- 4.1. **Governance; Annual Political Plan:** The Governance and Nominating Committee (the “GNC”) of the Company’s Board of Directors, composed entirely of independent directors, shall review political contributions, including the use of corporate funds. *A representative from Global Government Affairs shall present to the GNC for review on an annual basis:* (a) an annual political plan for both TYPAC contributions and corporate contributions (the “Annual Political Plan”) (which plan shall be developed as set forth in Section 4.1.1 below and shall include one or more annual authorized contribution budgets); and (b) prior year government relations activity and the process by which prior year political contributions were made.

4.1.1. The Annual Political Plan shall be developed with input from members of the Company’s Global Government Affairs team and the TYPAC Board, as needed, as well as from the Company’s Chief Legal Officer. Following approval of the Annual Political Plan by (a) the TYPAC Board (as defined in Section 4.2 below) with respect to TYPAC contributions and (b) the Company’s Head of Global Government Affairs with respect to corporate contributions, the Annual Political Plan shall be presented to the GNC for review in accordance with Section 4.1 above.

- 4.2. **Tyson Foods, Inc. Political Action Committee and Contributions:** TYPAC is an independent, separate legal entity funded through voluntary contributions from Company team members eligible under U.S. law. It has a dedicated Board of Directors (the “TYPAC Board”) and specific bylaws. The Head of Global Government Affairs currently chairs the TYPAC Board. TYPAC will make contributions in a non-partisan manner to U.S. candidates for federal office, leadership and industry Political Action Committees (“PACs”).

4.2.1 The TYPAC Board will conduct a review of the Annual Political Plan with respect to TYPAC contributions and make any necessary modifications. The Head of Global Government Affairs has limited discretion to change recipients and amounts of TYPAC contributions from the Annual Political Plan in light of new considerations. For amounts exceeding \$5,000, TYPAC Board approval must be obtained before proceeding with any changes.

- 4.3. **Corporate Contributions:** Corporate contributions (including any contributions made by a Tyson corporate subsidiary) will be made on a limited basis to state and local candidates where state and local laws allow. These contributions shall be approved in writing by the Head of Global Government Affairs as part of the Annual Political Plan.

POLITICAL CONTRIBUTIONS AND EXPENDITURES POLICY

4.3.1 The Head of Global Government Affairs has limited discretion to change recipients and amounts of corporate contributions from the Annual Political Plan in light of new considerations. For amounts exceeding \$5,000, the Head of Global Government Affairs may proceed with any changes *only* in consultation and coordination with the General Counsel.

4.3.2 Team members, including all corporate and operational leadership, or authorized agents of the Company who desire to make a state or local corporate political contribution *using company funds* must **first** complete the Political Contributions Form and coordinate with Global Government Affairs for pre-approval in accordance with this Policy. For purposes of this Policy, providing access to and use of Company premises to host political candidates or fundraising activities can present complexities, including whether facility use amounts to an in-kind political contribution. While [Political Contribution Disclosure form](#) is not required for such use of Company premises, advanced notice to Global Government Affairs is required for concurrence and coordination.

4.4. Compliance: U.S. federal law generally does not permit contributions, including in-kind contributions (for example, the donation of food products) by corporations to candidates for federal office or national party committees, but corporations may make monetary and in-kind contributions to candidates running for state or local office in some states and may contribute to various organizations that engage in political activities. The Company will comply with all applicable laws and regulations governing campaign finance, political contributions or expenditures for U.S. federal, state, local elections, and political activities, including reporting and disclosure requirements. The Company will regularly consult internal and outside counsel to confirm that its political expenditures and other political and lobbying activities are undertaken in compliance with applicable law, this Policy, the Global Giving Policy and the Code of Conduct.

4.4.1 *In compliance with U.S. federal law, Tyson Foods does not contribute corporate funds to federal candidates, nor does it engage in political giving outside of the United States.*

4.4.2 No political contributions, whether monetary or in-kind, may be made by Tyson Foods or its team members on behalf of the Company outside of the process established under this Policy.

4.5 Decisional Framework for Making Political Contributions and Expenditures:

4.5.1 Political contributions are made in the interest of the Company's public policy objectives and without regard to individual

POLITICAL CONTRIBUTIONS AND EXPENDITURES POLICY

executive preferences. Among the factors considered (pursuant to applicable law) in determining which candidates and initiatives to support, Company and TYPAC representatives balance the views promoted by a candidate, the quality and effectiveness of the candidate or organization to which the contribution is made, and the appropriateness of the level of involvement of the Company in an election. Specifically, the factors considered include, but are not limited to:

- Whether the candidate represents a state or district within which a Tyson Foods business operates or is located;
- Whether the candidate represents a state or district within which a significant number of Tyson Foods team members are located;
- Whether the candidate sits on a committee that addresses legislation affecting Tyson Foods businesses or the global economy;
- The candidate's elected political leadership position, committee standing, and voting record on business and policy issues germane to the Company; and
- The personal characteristics of the candidate, including the candidate's integrity and effectiveness.

The Company may also utilize other factors or criteria for determining political contribution recipients from time to time.

4.6. Lobbying Activities:

4.6.1 Tyson Foods exercises its right to participate in the public policy process to advance the best interests of the Company and its shareholders. The Company's Government Affairs department is responsible for coordinating the Company's lobbying activities, including engagements with federal, state, and local governments. All lobbying activities are conducted only with the prior approval of the Company's Government Affairs department, which works with key internal stakeholders to focus our involvement at all levels of government on furthering the Company's business objectives and our goal of protecting and enhancing shareholder value. *The Head of Global Government Affairs shall regularly review all Tyson Foods lobbying activities and annually report to the GNC concerning lobbying and political activities.*

4.7. Disclosure:

4.7.1 The Company's federal lobbying reports, filed with the Clerk of the House and the Secretary of the Senate, can be found on the website currently located at:

http://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm.

POLITICAL CONTRIBUTIONS AND EXPENDITURES POLICY

4.7.2 On a semi-annual basis, Tyson Foods will disclose on its corporate website all political contributions made pursuant to this Policy by TYPAC and the Company to political candidates, parties and committees (as defined under Section 527 of the Internal Revenue Code), or to influence the outcome of a ballot measure, including recipient names and amounts.

4.7.3 In addition, Tyson Foods will request each U.S. trade association, identified as tax-exempt by the Internal Revenue Service under Section 501(c)(6), and each social welfare organization, identified as tax-exempt by the Internal Revenue Service under Section 501(c)(4), that received from the Company total payments of \$50,000 or more in annual dues that report the portion of Tyson Foods dues or payments used for political expenditures or contributions that if made directly by Tyson Foods would not be deductible under Section 162(e)(1)(B) of the Internal Revenue Code. The Company will disclose such information received from such trade associations annually on its corporate website.

4.8 Reimbursements: The Company will not reimburse anyone for a political contribution or expenditure.

5.0 Responsibility

5.1. Policy Interpretations: All questions about this Policy should be directed to the Chief Legal Officer or other designated persons in the Company's Law and Compliance Department. The Chief Legal Officer or designee, in consultation with the Head of Global Government Affairs, is responsible for administering and interpreting this Policy.

5.2. Periodic Review; Amendments: This Policy will be reviewed periodically by the Chief Legal Officer, or other designated persons in the Company's Law and Compliance Department in consultation with the Head of Global Government Affairs. Amendments to this Policy must be approved by the Chief Legal Officer, in consultation with the Head of Global Government Affairs.

6.0 Public Posting

6.1. The Company includes this Policy on its website at [Tyson Foods Inc. - Environmental, Social, Governance](#) and will update it as necessary to assure that securities market participants are informed about this Policy.

7.0 Additional Policy Information

7.1 Related Documents

POLITICAL CONTRIBUTIONS AND EXPENDITURES POLICY

- 7.1.1 [Global Giving Policy](#)
- 7.1.2 [Code of Conduct](#)
- 7.1.3 [Political Contribution Disclosure form](#)

8.0 Revision Record

- 8.1. 9/1/2021 – Initial version published (replaces the Company’s Political Giving Guidelines in their entirety)
- 8.2 10/10/2022 Addition of the Political Contribution Disclosure Form procedure