

California Transparency in Supply Chains Act Disclosure

Slavery and Human Trafficking Disclosure

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

Effective January 1, 2012, the California Transparency in Supply Chains Act of 2010 requires Smithfield 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 has adopted a Supplier Code of Conduct (our “Supplier Code”). A primary tenet of that code is adherence to all laws and regulations governing labor and human rights, including those addressing forced labor and human trafficking.

Audit. Smithfield has the right but does not currently conduct audits of suppliers to evaluate supplier compliance with company standards against trafficking and slavery in supply chains.

Supplier Certification. Our Supplier Code requires all suppliers to submit to an audit of the supplier’s facilities, upon request by Smithfield, and inform Smithfield of any regulatory noncompliance or violation of the Supplier Code. Smithfield does not currently certify supplier compliance with the Supplier Code or our Policy.

Accountability. Smithfield is committed to ethical and socially responsible conduct in the workplace. Upon hire, Smithfield 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 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.