

## **SWIFT FOODS COMPANY FINANCIAL CODE OF ETHICS**

This Financial Code of Ethics (this “Financial Code”) of Swift Foods Company and its subsidiaries (the “Company”) contains the ethical principles by which the chief executive officer, chief financial officer, principal accounting officer, controller and other senior financial officers designated from time to time by the Company (the “Senior Officers”) are expected to conduct themselves when carrying out their duties and responsibilities. Senior Officers must also comply with the Company’s Corporate Code of Conduct that is applicable to all employees.

### **Ethical Principles**

In carrying out his or her duties to and responsibilities for the Company, each Senior Officer should:

- act ethically with the highest standards of honesty and integrity, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- avoid conflicts of interest by
  - disclosing to the General Counsel or to the Audit Committee of the Board of Directors any material transaction or relationship that reasonably could be expected to give rise to such a conflict, and
  - complying with the procedures, limitations, additional disclosure and reporting obligations, and other requirements that the General Counsel, the Audit Committee of the Board of Directors, or any executive officer senior to that Senior Officer may establish to mitigate or eliminate the conflict of interest or its effects on the Company;
- provide full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the United States Securities and Exchange Commission and in other public communications that the Company makes;
- comply with applicable laws, rules and regulations of national, state, provincial and local governments and their agencies;
- comply in all material respects with the listing standards and rules and regulations applicable to listed companies for the national securities exchange or automated inter-dealer quotation system on which the Company’s securities may be traded;
- act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing his or her independent judgment on behalf of the Company to be subordinated to other interests;

- promote honest and ethical behavior by others in the work environment;
- respect the confidentiality of information acquired in the course of the Senior Officer's work except when authorized or otherwise legally obligated to disclose that information;
- not use confidential information of the Company for the personal advantage of the Senior Officer or acquaintances, friends or relatives of the Senior Officer; and
- responsibly use and maintain all assets and resources employed by or entrusted to such Senior Officer.

## **Waivers**

Consents obtained pursuant to this Financial Code, or waivers of any provision of this Financial Code, may be made only by the Board of Directors or the Audit Committee of the Board of Directors. Persons seeking a waiver should be prepared to disclose all pertinent facts and circumstances, respond to inquiries for additional information, explain why the waiver is necessary, appropriate, or in the best interest of the Company, and comply with any procedures that may be required to protect the Company in connection with a waiver. If a waiver of this Financial Code is granted for any Senior Officer, appropriate disclosure will be made in accordance with legal requirements and any applicable stock exchange regulations.

## **Compliance Procedures**

Enforcement of sound ethical standards is the responsibility of every officer and employee of the Company. Violations and reasonable suspicions of violations of this Financial Code must be reported promptly to the General Counsel or the Audit Committee of the Board of Directors. The reporting person must make full disclosure of all pertinent facts and circumstances, taking care to distinguish between matters that are certain and matters that are suspicions, worries, or speculation, and also taking care to avoid premature conclusions or alarmist statements since the situation may involve circumstances unknown to the reporting person. If the situation so requires, the reporting person may report anonymously. The Company does not permit retaliation of any kind for good faith reports of ethical violations. Persons making a report knowing it is false or willfully disregarding its truth or accuracy, or engaging in any other bad faith use of the reporting system, are in violation of the Company's Code of Conduct as well as this Financial Code.

Each Senior Officer of the Company will be provided with a copy of this Financial Code. This Financial Code may also be provided to any other employee deemed appropriate by any Senior Officer or the General Counsel. Each Senior Officer must annually sign a written affirmation acknowledging that the Senior Officer has received, read and understood this Financial Code. The affirmation may be separate from or included within another affirmation or acknowledgment relating to codes of conduct and ethics, employee manuals, handbooks, or other materials supplied to Senior Officers. Any Senior Officer, executive officer or employee to whom this Financial Code has been provided may be required, from time to time, to sign a written affirmation stating that the person (1) has received and read this Financial Code and

understands its contents, (2) has not violated this Financial Code, and (3) has no knowledge of any violation of this Financial Code that has not been communicated previously to the General Counsel or the Audit Committee of the Board of Directors.

### **Violations**

Each person is accountable for his or her compliance with this Financial Code. Violations of this Financial Code may result in disciplinary action, including dismissal from employment when deemed appropriate. Each case will be judged by the General Counsel or the Audit Committee of the Board of Directors on its own merits considering the duties of the person and the significance of the circumstances involved.

### **Amendment**

Any amendment to this Financial Code may be made only by the Company's Board of Directors or the appropriate committee thereof. If an amendment to this Financial Code is made, appropriate disclosure will be made in accordance with legal requirements and any applicable stock exchange regulations.