



Section:
Subject: Gift Policy

Issue Date: March 20, 2006
Supercedes: All Prior Policies
References: Financial Policy Expenses
Employee Awards & Gifts

Policy Owner: Human Resources

PURPOSE

To establish and communicate a standard policy for all Swift & Company employees as it relates to the giving and receiving of business gifts and courtesies.

SCOPE

This policy is applicable to all Swift & Company North American employees.

GENERAL POLICY STATEMENT

Swift & Company is committed to conducting business solely on the merit of our products and services. Therefore, each employee must remain free of interests or relationships which are, or appear to be, directly or indirectly harmful or detrimental to the Company's interest or which give the appearance of undue influence in decision-making. All employee conduct must ensure our relationship with vendors, customers and any other outside individuals or agencies is not compromised by the real or perceived impression that Swift & Company benefited through unfair business inducements. This policy applies to all employees of the Company and is not limited to employees engaged in the purchasing or selling of goods or services on behalf of the Company. It also includes business relationships involving other areas such as regulatory compliance, labor relations, etc.

SPECIFIC CONDUCT:

General:

Employee must be aware of and not violate any customer or vendor policy pertaining to gifts or business courtesies.

Prohibited Activity:

Employees are prohibited from soliciting, accepting or giving any kind of compensation, kickbacks, rebates, rewards, honoraria or cash of any amount, gift certificates, stocks or marketable securities. Further, employees may not accept non-monetary gifts or courtesies including trips, use of facilities or equipment such as vacation homes, or any other items strictly for the employee's personal use or benefit.

Items may not be redirected to another individual or agency on behalf of the Company.

An employee may never use personal funds or resources to do something that cannot be done with company resources.

Acceptable Practices:

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Employees may give or receive non-monetary gifts or courtesies of a nominal value as long as it is within the intent of this policy and customary business activities extended in accordance with accepted ethical business practices. This would include:

- Meals, refreshments and entertainment as long as it is reasonable in value considering the nature of the event, the location of the event, the number and identity of the guests, provided that business is conducted. In order to further the business relationship, representatives of all parties must be present. For example, it would not be acceptable to simply send entertainment tickets to a customer or vendor and not have a Swift representative in attendance with the customer or vendor.
- Unsolicited gifts usually given during the holidays such as cookies, nuts, etc., are acceptable and should be shared with other departmental employees.
- Promotional items of nominal value (generally \$25 or less), such as calendars, pens, mugs, caps and t-shirts, etc.

This policy does not apply to Swift charitable donations such as products, old computers, unused furniture, etc., that are given with the approval of the facility General Manager or Corporate Department Head.

Vendor Communication:

To assist our employees in the communication of this policy and its intended purpose, we have sent a copy of this policy to our primary vendors and customers asking for their understanding and cooperation in adherence to the policy. If you would like a similar communication sent to a company, agency or individual with whom you conduct business on behalf of Swift & Company, please contact the Human Resources Department.

Accountability & Clarifications:

The final application and interpretation of this policy is at the sole discretion of the Company. Each employee is responsible for knowing and adhering to the intent of this policy and raising any questions if there is any uncertainty about the interpretation or application of the policy. If you have a concern whether the policy is being met or aware of a possible violation immediately contact the Human Resources Department or the Ethics Officer. Any violation of the intent of this policy may result in discipline up to and including discharge.

International Customs:

In some circumstances and in certain International cultures, it is very much a part of their business customs to offer or exchange gifts. If you are working with a customer or an



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International client, please seek guidance on the application of this policy from the Channel General Manager or Human Resources or the Ethics Officer. The intent of this policy is to avoid even the appearance of a conflict.