

## **OFFICE OF FOREIGN ASSET CONTROL (OFAC) POLICY**

It is the policy of Seaboard Corporation and its subsidiaries (“Seaboard”) to comply with the laws of the United States, which includes rules and regulations of the Office of Foreign Asset Control, a division of the U.S. Treasury (“OFAC”). OFAC was created to enforce trade sanctions and achieve national security goals of the United States against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States. The OFAC regulations prohibit U.S. entities and their foreign branches, U.S. citizens, and any person regardless of citizenship located in the United States, from engaging in or facilitating transactions or making monetary transfers to certain designated countries and designated entities and persons listed on the OFAC list of Specially Designated Nationals and Block Entities (“OFAC SDN List”). The list includes numerous vessels listed by name, and chartering or placing cargo on such vessels is also forbidden.

Before engaging in or facilitating any foreign transaction or making any monetary transfer, the person responsible for the transaction shall review the OFAC SDN List to ensure that the counterparty(ies) to the transaction is not on the list. This search may be done by reviewing the OFAC SDN List and/or by subscribing to a web-based searchable database to confirm that Seaboard trading partners are not on the OFAC SDN List.

In the event of the discovery of any violation of this policy, the violation should be promptly reported to Seaboard Corporation’s General Counsel.

All applicable records of OFAC compliance, violations and audit work papers will be retained according to OFAC guidelines (5 years).

## **OFFICE OF FOREIGN ASSET CONTROL (OFAC) POLICY** **EMPLOYEE ACKNOWLEDGEMENT**

By checking the acknowledgment box on the following screen, I certify that I have received, read and understand, have abided by, and will continue to abide by, the OFAC Policy (the “*Policy*”) of Seaboard Corporation. I understand that any questions about the Policy should be directed to the applicable Division General Counsel or the Company’s General Counsel.

***Please close this screen to continue.***