



1. PURPOSE

The purpose of this policy is to establish minimum orientations for the Company's employees and stakeholders regarding the guidelines for situations involving conflicts of interest.

2. DEFINITIONS

Company: Marfrig Global Foods S.A., its branch offices and its subsidiaries and/or companies under its management.

Conflict of Interest: are characterized as any case in which an individual or legal entity that has any kind of business dealings with the Company is involved in a decision-making process in which they hold the power to influence and/or guide the outcome of the decision, thereby obtaining any gain and/or benefit for themselves, any member of their family or any other third party with which they have any type of involvement, or further, are in a situation that could interfere in their capacity for impartial judgment.

Confidential Information: any data or information of the Company (even if not the property of the Company, but received by the Company due to a business opportunity, for example) or created by the Company and that becomes the knowledge of any employee or stakeholder, including, but not limited to, any information of a technical, commercial, financial, legal, strategic or technological nature, know-how, designs, models, data, records, specifications, reports, compilations, analyses, forecasts, research, reproductions, summaries, communications, formulas, patents, financial and economic data, information on current or potential clients or suppliers, financial operations, marketing plans, financial statements or plans, marketing strategies and other businesses, agreements, existing or future products or any other information owned by the Company that is entrusted to an employee or stakeholder.

Relatives: the spouse or partner, grandparents, parents, children, aunt or uncle, cousins, nephews or nieces, grandchildren and in-laws of employees and stakeholders, as well as of their spouses or partners.

Stakeholders: controlling shareholders, shareholders, directors and members of the committees of the Company.

Related Parties: any individual or legal entity who **a)** directly or indirectly, through only one or more intermediaries: i) exercises de



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facto or joint control, is controlled or is under joint control of the Company; or ii) in some way hold significant influence over the Company; **b)** is affiliated companies of the Company, pursuant to Federal Law 6,404/1976 – Brazilian Law of Corporations (“Brazilian Corporation Law”); **c)** are considered key people by Marfrig, i.e., hold senior executive positions at the Company, its subsidiaries or its controlling shareholders; **d)** with regard to any person described in items “a” to “c”: i) the spouse or partner; ii) a blood-related antecedent, such as parent, grandparent, great-grandparent or antecedent by affinity, such as step-parent or father- or mother-in-law; iii) blood-related descendant, such as children, grandchildren etc. or descendant by affinity, such as stepchild or daughter- or son-in-law, etc.; and iv) a relative to the second degree, related by blood or otherwise, such as siblings or brothers- or sisters-in-law etc.; **e)** could exercise significant influence, i.e., has authority and responsibility for planning, directing and controlling the operations of the Company, directly or indirectly, including any manager (Board of Directors, Advisory Committees to the Board of Directors, Board of Executive Officers and other non-statutory officers); **f)** the Company has the possibility of contracting under conditions other than those of independence that characterize transactions with third parties not related to Marfrig.

Third Parties: the various entities and individuals acting on behalf of a company, including, but not limited to, agents, consultants, sales representatives, customs agents, dealers, subcontractors, franchisees, lawyers, accountants or similar intermediaries.

3. PURPOSE

The purpose of this policy is:

- to establish minimum guidelines on situations that characterize conflicts of interest;
- to establish minimum guidelines on the conduct expected from Marfrig's employees, stakeholders and third parties acting on its behalf, as well as to present internal control mechanisms for preventing and detecting potential situations that could be interpreted as being in noncompliance.

4. PUBLIC



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Applies to the entire value chain, regardless of geographic location. Accordingly, this policy is applicable to all employees, stakeholders and third parties of the Company acting on its behalf.

5. CONTENT

Conflicts of interest are not issues limited to senior management: any employee or stakeholder of the Company could face a conflict. The point is to be able to identify these situations and to apply Marfrig's recommendations.

All employees and stakeholders must avoid situations involving conflicts of interest and perform their functions conscientiously and honestly.

Employees and stakeholders must not abuse their positions, use Confidential Information improperly for personal gain or the gain of an intermediary third party or have any direct involvement in any business activity that conflicts with the commercial interests of Marfrig or that in some way jeopardizes their independence and impartiality.

If an employee finds themselves in a situation involving a conflict of interest during their work at the Company, whether internal or external, it is recommended that they do not participate in any decision under discussion.

The members of the Board of Directors are responsible for monitoring and managing the potential conflicts of interest of the Board of Directors itself, of the Board of Executive Officers and of the Audit Board in order to avoid the misuse of corporate assets and especially abuses in related-party transactions. Any member of the Board of Directors, Board of Executive Officers and Audit Board who, for any reason, presents private interests or interests that conflict with those of the Company in certain discussions and voting processes must inform immediately the fact and abstain from participating.

For clarification, some examples of orientations for situations characterized as conflicts of interest follow:

- it is recommended that employees with an affective or loving relationship do not work in the same department, even without any relationship of subordination. These situations must be reported to the Human Resources Department of your unit;



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- employees with an affective or loving relationship between each other are prohibited from jointly representing the Company before third parties;
- employees, stakeholders and their relatives who hold an ownership interest in a client or supplier of the Company are prohibited from using their position to influence, prioritize or obtain advantages for themselves or for the companies in which they hold an interest;
- employees, stakeholders and their relatives are prohibited from acquiring any shares in companies, clients or suppliers of the Company based on privileged information;
- employees and stakeholders are expressly prohibited from providing and/or making available, in any way, confidential information to third parties without prior and express authorization;
- all resources made available by the Company (such as, but not limited to, facilities, equipment, email, telephony) must be used exclusively for corporate purposes;
- employees and stakeholders are prohibited from giving statements on behalf of the Company without prior and express authorization;
- employees and stakeholders are prohibited from taking for themselves, personally or for the benefit of others, any business opportunities related to the business activities of the Company that are presented to them and from competing, directly or indirectly, with the Company;
- employees and stakeholders are prohibited from taking into consideration their personal interests, whether directly or indirectly, when selecting a supplier;
- employees are prohibited from influencing any decision related to the process of contracting suppliers and hiring employees, regardless of whether they were recommended by them, who are their relatives and/or related parties;



- employees and stakeholders who hire, engage or in way solicit, verbally or in writing, any third party that currently supplies goods and services to the Company to supply goods or services to them personally are prohibited from using their position to obtain advantage for themselves, their relatives or third parties;
- employees who establish partnerships or engage services with companies linked to stakeholders are prohibited from doing so to obtain advantages for themselves, their relatives or third parties.

5.1. Control Mechanisms

The Compliance Department must conduct annually the monitoring of all employees in manager positions or above and stakeholders for any situations of conflict of interest.

All other employees must inform the Compliance Department, through the communication channels made widely available, any situations of conflict of interest involving themselves and/or their relatives.

When a new employee is hired, the Human Resources Department must collect with the admissions documentation an express declaration regarding if they have relatives working for the Company as an employee.

If the employee declares during the hiring or integration process that they have relatives working for the Company as an employee, the Human Resources Department must monitor this conflict of interest to avoid any relationship of direct or indirect subordination, the allocation of relatives to the same department and the allocation of persons to departments whose duties include supervising, auditing and approving the work of their relatives and who may somehow interfere in the salary and professional evolution of the employee.

- whenever an employee is in a situation of conflict of interest and such situation has not been previously informed, the employee must inform immediately this fact to the Compliance Department through the communication channels made widely available.

5.2 Disciplinary Measures

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If violations to this policy are confirmed, employees and stakeholders will be subject to termination of their relationship with the Company, as well as any other corrective and legal actions under the applicable laws and regulations, including the Code of Ethics and Conduct and the Policy on Disciplinary Measures.

6. GENERAL PROVISIONS

When potential conflicts involving the company's internal rules and guidelines are observed, employees should guide their conduct by adopting the most restrictive rule or guideline.

7. CONFIDENTIALITY STATUS

This is a public policy.