 <b>DONATIONS, SPONSORSHIPS AND CONTRIBUTIONS POLICY</b>	VERSÃO PDP 1.2
	DATA DA APROVAÇÃO 14/07/2022
	DATA DA PRÓXIMA REVISÃO 13/07/2023

## **DONATIONS, SPONSORSHIPS AND CONTRIBUTIONS POLICY**

Marfrig’s Compliance Policies may be adapted due to applicable laws in different jurisdictions. These adaptations, when issued, will be published through the document “Appendix- Country- Policy’s Name” and will be available on the Intranet and local Human Resources

### **1. PURPOSE**

The purpose of this policy is to establish minimum guidelines related to donations, sponsorships and contributions of assets and/or values by the Company.

### **2. DEFINITIONS**

**Public Agent:** It is any official of the government or any department, agency or instrument thereof, or a public international organization, or any person holding an official office for or in name of any government or department, agency, or behalf of any international public organization.


**Company:** Marfrig Global Foods S/A, its subsidiaries and the companies controlled and/or managed by it.

**Conflict of Interests:** Any situation in which an individual or legal person maintaining any form of business with the Company is involved in a decision-making process in which it has the power to influence and/or direct the outcome of that decision, ensuring a gain and/or benefit for himself, to any member of his family, or to any Third Party with whom he has any involvement, or be in a situation that could interfere with his ability to be impartial in a judgement.

**Donation:** Contract in which a person, or institution, for liberality, transfers from his property goods or services to another, who accepts them.

**Relatives:** It is deemed the spouse or partner, grandparents, parents, children, uncles, cousins, nephews, grandchildren, stepchildren, step-father/step-mother, son-in-law of contributors and Interested Parties, as well as their spouse or partner.

**Sponsorship:** It comprises a form of communication originated by two or more entities in which a relationship of financial support or service of the first one (the sponsor) is established, establishing an association for its image, products and services, in exchange for the support offered for the second (sponsored).

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**Contribution:** It is the accomplishing of something to help produce or achieve something together with other physical and/or legal persons, or to help you do something successful.

### 3. GOAL

The goals of this policy are:

- Establish minimum guidelines related to donations, sponsorships and contributions;
- Establish minimum guidelines on the expected behavior of the Company's contributors, Interested Parties and Third Parties acting on Company's name, as well as to present internal control mechanisms for the prevention and detection of possible acts that may be interpreted and/or deemed as not in compliance.


### 4. PUBLIC

Applies across the entire value chain, regardless of geographic location. Thus, this policy is applicable to all contributors of the Company, Interested Parties and Third Parties acting on behalf of the Company.

### 5. CONTENT

Donations, contributions, sponsorships and the like transactions may be understood as a way of influencing decisions of the Company or its Contributors and Interested parties, and may eventually be framed as corruption, bribe, improper advantage or money laundering.

This policy determines the conditions under which the Company allows donation, sponsorship and/or contribution transactions to any interested party, public agent or private entity, and whether or not for profit, provided the transactions are deemed lawful, comply with applicable laws and regulations applicable, are aligned with the annual budget and directly related to Company's business legitimacy, such as encouraging the social, economic, technological and business development of the Company's regions.

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The intentions of donations, sponsorships and contributions can arise from the external environment (Interested Parties) and from the internal environment (contributors). For both cases, they must meet the eligibility criteria and guidelines presented in this policy.

The Company expects that its contributors not only comply with clear prohibitions of laws and policy guidelines, but also recognize when it is appropriate to seek advice from the Compliance department before undertaking any action and/or activity.

Donation, sponsorship and contribution transactions must be mandatorily carried out in accordance with the following criteria, respecting applicable laws and regulations, and always considering the most restrictive policy or procedure. No donation, sponsorship and contribution will be in compliance if you do not meet all the criteria presented below:


- Must be permitted by law and be in compliance with all guidelines, ethical standards and conduct of Company;
- Must be supported by contracts, which must contain clauses protecting Marfrig, including anti-corruption clauses, combating money laundering, counterterrorism, trafficking of drugs and equivalents, purpose, the rights and obligations of the parties involved, commitment to the correct application of remedies, terms of penalties and fines in cases of breach of obligations and be signed by legal representatives;
- Cannot be linked to any type of political party campaigns, or even involving a public management authority or server, directly or indirectly, whether at the Federal, State or Municipal level;
- Must be performed for registered and reputable entities;
- Cannot be made to Interested Parties that in any way may have a Conflict of Interests with Company's ethical and conduct guidelines and/or that may expose it to undesirable risks;
- Should not be characterized as exchanges of favors with any individual or legal entity;



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- Do not generate dependency of continuity of the benefit to the entity;
- The beneficiary entity formally states how the donated resources will be used;
- The beneficiary entity is accountable for the use of the resources;
- Transactions in kind and/or equivalent are prohibited;
- The funds are wired to a bank account in name of the beneficiary entity;
- Must take steps to ensure that funds have been wired to a valid bank account;
- The Company shall establish the limits, in value and quantity, of donations, sponsorships and contributions to be executed in the fiscal year (12 months);
- Must always be carried out in a transparent manner and with the appropriate accounting and tax records;
- Cannot be associated with any risk to life or the environment, which do not pollute the environment or affect fauna and flora;
- That do not express transgression, restriction or that corroborate prejudice to minority groups or that have controversial themes that imply some kind of social, racial or gender discrimination;
- Donation, sponsorship and public management contributions are prohibited, except for those previously established and expressly approved by the Company;
- The pretext of donations and charitable contributions is barred as a way of channeling, concealing and/or manipulating bribery practices to public management, as well as payment of undue advantage and/or any illegal transaction;

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- Must not have any links with Company's contributors, as well as with their Relatives;

## 5.1. POLITICAL DONATIONS

Under Brazilian law, it is prohibited to make, on behalf of the Company, contributions or donations, in cash or in kind, to finance election campaigns or political parties, candidates or coalitions.

Furthermore, Brazilian law states that individuals may make donations in cash to election campaigns, but Marfrig highly recommends that you not make these kinds of donations in order to reduce your exposure while reinforcing the importance of protecting your integrity and the image of the Company and of its employees.


In addition, if employees (individuals) make political donations, they must previously inform the Compliance and Legal Departments to assess any possible risk exposure involving the Company's image, save for the exception of companies of the Group based in other countries where the law expressly permits such donations. Any donations made, however, must be duly booked and informed to the Compliance Department of Marfrig.

## 5.2. RECORDS AND MONITORING

Records must be kept in compliance with applicable laws and regulations reflecting the integrity, accuracy, and precision of transactions related to the offering and/or receipt of donations, sponsorships and contributions, and prohibited confidential, unregistered and/or uninformed transactions. In addition, it is essential that these transactions are properly documented through legal evidence and corresponding reports, and mandatorily guide their conduct considering the policy or procedure more restrictive.

It is recommended a specific accounting account for donation, contribution, and sponsorship transactions, which will be audited by the internal audit department and monitored through the Compliance Committee on a quarterly basis.

## 6. GENERAL PROVISIONS

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When there are potential conflicts among Company's internal rules and guidelines, contributors should guide their conduct by considering the most restrictive rule/guideline.

## **7. CONFIDENTIALITY STATUS**

This policy is for internal use only.