

	<b>DONATIONS, SPONSORSHIPS AND CONTRIBUTIONS POLICY</b>	VERSION PDP 1.0
		APPROVAL DATE 05/06/2019
		NEXT REVIEW DATE 05/05/2020

## 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.
- Do not generate dependency of continuity of the benefit to the entity.
- The beneficiary entity formally states how the donated resources will be used.

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

### **5.1. DONATION TO POLITICAL PARTIES**

Based on Art. 24 of Law No. 9,504, it is prohibited, directly or indirectly, to donate in cash or cash equivalent, including through publicity of any kind, from:

- Foreign entity or government.
- Body of direct and indirect public management or foundation maintained with funds from the Public Power.
- Concessionaire or public service licensee.

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- Entity of private law that receives, as beneficiary, compulsory contribution by virtue of legal provision.
- Public utility.
- Class or union entity.
- Non-profit legal entity that receives funds from abroad.
- Beneficial and religious entities.
- Sports entities.
- Non-governmental organizations that receive public funds.
- Civil society organizations of public interest.

Accordingly, it is expressly prohibited to make any donation on Company's name to any political party.

In addition, Law No. 9,504 mentions that individuals may make cash donations for electoral campaigns, however the Company strongly recommends that such donations for electoral campaigns be not made in order to reduce their exposure by reinforcing the importance of integrity, Company's image and their contributors.

In addition, in cases where donations are made to political parties and to public positions by contributors (individual), it is necessary to inform the Compliance and Legal Department in advance for evaluation of possible exposure to Company's image risk.

## **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.

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## **6. GENERAL PROVISIONS**

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.