



1. PURPOSE

The purpose of this policy is to establish minimum orientations for the Company's employees, stakeholders and third parties regarding competition law.

2. DEFINITIONS

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

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

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 purposes of this policy are to:

- establish the minimum guidelines for the Company's relations with competitors and third parties;
- establish the minimum guidelines on the conduct expected from Marfrig's employees, stakeholders and third parties acting on its behalf and to present internal control mechanisms for preventing and detecting any situations that could be interpreted as being in noncompliance.

4. PUBLIC

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

Compliance with antitrust and fair competition laws ensures the proper functioning of the market, free competition, lower prices and higher quality products, while promoting diversification, innovation and economic development.

Marfrig treats its competitors and third parties in the same way that it expects to be treated. Therefore, its employees, its stakeholders and third parties acting on its behalf are prohibited from making comments that could adversely affect the image of competitors as well as from making public any unauthorized information.

Any violation of Brazil's Antitrust Law (Federal Law 12,529/2011) could subject the Company, its employees and its stakeholders to criminal sanctions, including fines, imprisonment and civil liabilities. Therefore, employees, stakeholders and third parties acting on behalf of the Company are prohibited from colluding to set prices, conducting corporate spying or any other illegal act aimed at obtaining information on the Company's competitors or undue commercial advantages.

Pursuant to Article 36 of Federal Law 12,529/11, violations of antitrust law, irrespective of fault, are characterized by acts expressed in any form that aim to or could produce the following effects, even if not achieved:

- I - restrict, falsify or adversely affect in any way free competition or free initiative;
- II - dominate a significant share of the market for goods or services;
- III - increase profits arbitrarily;
- IV - abuse a dominant position.

Moreover, Article 36 and others of Federal Law 12,529/11 describe the following behaviors that characterize antitrust violations and therefore are not tolerated by the Company:

- Negotiating, colluding, manipulating or adjusting with a competitor, in any way:
 - the prices of goods or services offered individually;
 - the production or sale of a restricted or limited quantity of goods, or the provision of a restricted or limited number, volume or frequency of services;

- the division of parts or segments of an existing or potential market for goods or services, including the distribution of clients, suppliers, regions or periods;
 - prices, conditions, advantages or abstention in public bid processes.
- Promoting, obtaining or influencing the adoption of uniform commercial conduct among competitors;
 - Restricting or impeding the access by new companies to the market;
 - Hindering the creation, functioning or development of competing companies, suppliers or acquirers or financiers of goods and services;
 - Impeding access by competitors to sources of inputs, raw materials, equipment or technologies, as well as distribution channels;
 - Using deceitful means to cause fluctuations in the prices of third parties;
 - Regulating markets for goods or services, entering into agreements to limit or control technological research and development, the production of goods or the provision of services, or hindering investments allocated to the production of goods or services or to their distribution;
 - Imposing, in the marketing of goods or services to distributors, retailers and representatives, resale prices, discounts, payment conditions, minimum or maximum quantities, profit margins or any other sale conditions related to commercial activities with third parties;
 - Discriminating against acquirers or suppliers of goods or services by setting different prices or operating conditions for the sale or provision of services;
 - Hindering or interrupting the continuity or development of commercial relations for an indeterminate period due to the

refusal of the other party to submit to unjustifiable or anticompetitive commercial clauses and conditions;

- Refusing the sale of goods or the provision of services with payment conditions typical to commercial practices and customs;
- Selling goods or provide services below cost with no justification.

5.1. Disciplinary Measures

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.

5.2. Reporting

Issues related to the topic, such as antitrust law and antitrust ethical conducts, among others, are reported to senior management bodies (Board of Directors, Board of Executive Officers and Committees) through reports on employee qualifications and mandatory training programs involving the topic of anticompetition. Moreover, information and indicators extracted from Marfrig's Whistleblowing Channel related to antitrust issues also are submitted for evaluation by these bodies in specific situations and with the required frequency.

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.