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1. PURPOSE

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

2. DEFINITIONS

Government Official: any servant of the government or of its departments, agencies or instruments, or of a public international organization; or any person exercising an official position for or on behalf of any government, department or agency, or on behalf of any international public organization.

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

Active Corruption: offering or promising any undue advantage to a civil servant to convince them to practice, omit or retard an official act.

Passive Corruption: soliciting or receiving, for themselves or others, directly or indirectly, even if outside the scope of their position or before assuming it, but by virtue of it, any undue advantage, or accepting a promise of such advantage.

FCPA: the Foreign Corrupt Practices Act of the United States of America, with global effect. It is the main U.S. legislation on the topic, as well as the most important and most efficient.

Fraud: intentional act practiced by one or more individuals, including managers, persons in charge of governance, employees, stakeholders and/or third parties, involving the use of false information to obtain unfair or unlawful advantages.

Money Laundering: economic and financial practices with the purpose of concealing the illicit source of financial assets or of property.

Brazilian Anticorruption Law: Federal Law 12,846/2013 and Decree 8,420/2015 compose Brazil's anticorruption legislation, which is a system applicable to legal entities with characteristics similar to those of the U.S. FCPA and the UK Bribery Act.

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Nepotism: practice in which a person favors someone in their family in a work or employment relationship based not on merit, but rather on a degree of kinship.

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

Kickbacks: act of giving or receiving concealed payments given to or received from someone for any service or information. Roughly speaking, it means buying someone off.

Bribery: giving or receiving financial or other benefits connected to the “inappropriate conduct” of someone in a position of trust or a function that should be performed impartially or in good faith. Bribery does not necessarily involve money or payments and can take many forms, such a gifts, generous treatments on business trips or event tickets to an event.

Third Parties: the many different 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.

UKBA: the UK Bribery Act is the anticorruption legislation of the United Kingdom created after pressure from the Organisation for Economic Co-operation and Development (OECD) and from harsh international criticism about corruption in United Kingdom and is currently the most restrictive legislation on the topic.

3. PURPOSE

The purposes of this policy are to:

- establish the minimum guidelines regarding the Company’s commitments to conducting business with transparency and integrity and in compliance with governing law, always striving for conduct based on ethical principles and values in all geographies where Marfrig operates;
- establish the minimum guidelines on the conduct expected from employees, stakeholders and third parties acting on behalf of the

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Company and providing internal control mechanisms to prevent and detect any acts that could be interpreted and/or considered in violation of the laws addressing crimes against public administration and property, including, but not limited to, corruption, conflict of interests and privileged information.

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

The Company's presence in domestic and international markets and the participation of its employees, stakeholders and third parties in various businesses, geographies and cultures requires continuous improvement of internal controls and reinforces the need to adopt clear, open and transparent standards, as well as proper recordkeeping of transactions, which must comply with all applicable laws and regulations and all corporate policies, including the Code of Ethics and Conduct, with the aim of minimizing any exposure to regulatory and compliance risks, and in turn supporting the creation and protection of value.

All employees, stakeholders and third parties must observe, comply with and ensure compliance with the terms and conditions of this policy, without prejudice to the laws of Brazil, such as the Brazilian Anticorruption Law, to the FCPA and UKBA and to any other applicable anticorruption legislation in force or that could be introduced in other jurisdictions, as well as any rules and regulations under implementation.

Compliance with this policy is essential to ensure the transparency and reputation of our businesses and activities, for which reason the Company does not tolerate the practice of any illegal acts, such as bribery, kickbacks and other acts of corruption.

5.1. Prohibited Practices

To protect themselves and the Company, it is important for all

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employees, stakeholders and third parties to remain attentive and to know how to prevent illegal activities, corruption and situations involving breaches of the compliance guidelines established by Marfrig. In view of this need, the Company prohibits certain practices, which include, but are not limited to, the following:

- Offering, promising, accepting, authorizing and/or concealing any payment made as a bribe to obtain advantages for themselves, their family members, stakeholders, third parties and/or government officials, with the purpose of:
 - influencing any act or decision of the government official and/or private entity;
 - inducing them to practice any act that violates their legal duties;
 - assuring any personal gain that could cause impacts on the Company's interests;
 - assuring any undue advantage;
 - inducing them to use their influence over a government body to help obtain, maintain or advance dealings with any person;
 - obtaining confidential information on business opportunities, bid processes or competitors' activities.

- Substantiated acts of financing, costing, sponsoring or in any way subsidizing the practice of the illegal acts provided for in this policy;

- Substantiated acts of using any individual or legal entity as an intermediary to conceal or disguise their real interests or the identity of the beneficiaries of the acts practiced;

- Falsifying documents, expense reports, financial, trademark or product records and structuring transactions in a way to fraudulently bypass approval processes and other internal controls;

- Practicing misappropriation, smuggling, corporate spying and/or any other unfair and anticompetitive practices.

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In accordance with the key provisions of anticorruption legislation, the crime of corruption is established solely on the promise of any undue advantage, even if such advantage is not actually given. The crime also is established regardless of whether the promise or attribution is made directly or indirectly, i.e., using a third party as intermediary.

5.2. Preventing and Combatting Money Laundering

The Company is firmly committed to preventing the use of its operations for money laundering or any activity that facilitates money laundering, the financing of terrorism or other criminal activities.

Employees, stakeholders and third parties that work with the formation and transfer of amounts must remain attentive to suspicious situations internally. If you have any questions about the transfer or receipt of amounts from unclear or unknown sources, you must report this fact to the Compliance Department through its communication channels, which are widely disclosed.

Employees and stakeholders must exercise their roles with reasonable caution to ensure that they do not establish relations with third parties that are controlled or acting on behalf of these individuals, entities and organizations subject to the restrictions imposed by certain jurisdictions. This includes requiring from these third parties declarations that they comply with practices for preventing and combatting money laundering and that they are not subject to any restrictions in the respective agreements or other documents to be entered into with the Company. The Legal Department must include clauses for preventing and combatting money laundering in the agreements to be executed with third parties.

For more details on the subject, read Marfrig's Policy on Preventing Money Laundering and Terrorism Financing, which is available at **www.marfrig.com.br/compliance**.

5.3. Accounting Records

Any Company employee who creates a false or incomplete record that does not reflect exactly and accurately their transactions or who does not disclose payments is subject to immediate disciplinary measures. If you become aware of any false record or unregistered payments, you must report said fact to the Compliance Department through its

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communication channels, which are widely disclosed.

5.4. 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.

The Company does not tolerate any kind of retaliation against any persons who make a report in good faith or complaints regarding violations of this policy or anticorruption laws. Any employees who are involved in retaliatory acts will be subject to disciplinary actions.

5.5. Internal Control Mechanisms

➤ **Compliance Department**

Marfrig's Compliance Department is responsible for promoting, implementing the provisions and maintaining the indicators set forth in this Policy.

➤ **Whistleblowing Channel (Helpline)**

All employees, stakeholders and third parties must be familiar with this channel and be aware of its use to report unethical behaviors, in the comprehensive sense. The channel is available for internal and external stakeholders for reporting any suspicion or determination of practices of corruption acts of any kind. Those submitting reports may be identified or remain anonymous, with confidentiality duly guaranteed.

Telephone: 0800-223-1000

Email: etica@marfrig.com.br

Questions: compliance@marfrig.com.br

➤ **Board of Directors, Audit Board and Committees**

Marfrig has effective and active boards and committees whose duties and functions include playing a role of unparalleled importance, which is monitoring the Company's Compliance Program.

In this context, Marfrig's Compliance Programs are periodically

submitted to the Company's Board of Directors for discussing, evaluating and ratifying the compliance mechanisms adopted in the Company's corporate and operating scopes.

➤ **Internal Audit**

The internal audit plays an important role in combating corruption. Internal auditors must give priority to the transparency and accuracy of reports, as well as follow the internal audit plan, which is approved annually by the Company's Board of Directors.

➤ **Clients, Suppliers and Service Providers**

All Company managers and employees must carefully analyze their service providers, suppliers and clients to ensure that they also fully comply with Marfrig's ethical and anticorruption rules and with the applicable legislation.

➤ **Clauses with Anticorruption Declaration**

The Company includes in agreements entered into with clients, suppliers and service providers clauses involving anticorruption declarations in order to extend to its partners the obligation to comply with anticorruption legislations and Marfrig's internal rules.

➤ **Relations with Government Officials**

In our business, contact with government officials is normal. As such, you must conduct such relationships based on ethical conduct, transparency and formality. Moreover, if requested, do not hesitate to sufficiently provide correct and up-to-date information to government officials to ensure compliance with the applicable rules.

➤ **Training Programs**

The Company has an awareness-raising program and an anticorruption training program for its employees and directors, which includes training on anticorruption policies and laws, as well as on Marfrig's Code of Ethics and Conduct.

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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.

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**APPENDIX 1 – DECLARATION OF RECEIPT AND COMMITMENT –
ANTICORRUPTION POLICY**

I hereby declare, for all purposes, that I have received a full copy of the Company’s anticorruption policy, read its provisions and commit to complying with them in full.

Accordingly, I am aware of the principles, guidelines and concepts of the Company’s anticorruption policy. I recognize and understand that I must comply strictly with the policy, as well as the national and international anticorruption laws applicable to the Company’s business activities in all geographies where it operates.

I also declare that I was informed that said compliance is mandatory in all situations and circumstances directly or indirectly set forth in the employment agreement signed by me.

Name:

Department where I work:

Location and date:

Signature:
