

	GIFTS, ENTERTAINMENT AND HOSPITALITY POLICY.	VERSION PBP 1.0
		APPROVAL DATE 05/06/2019
		NEXT REVIEW DATE 05/05/2020

1. PURPOSE

The purpose of this policy is to establish minimum guidance of offering and receiving gifts, gifts, entertainment and hospitality.

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.

Gifts: The terms “gifts” include items of monetary values. They may be offered in appreciation and/or gratitude to third parties and may not be offered with the goal of influencing third parties.

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

Entertainment/Hospitality: Means any social event, sport, meal, leisure, or any event of any nature or purpose, including charity, educational, conference events, as well as any transportation or hospitality related to these events in which an associated person of a member accompanies a customer representative. They are used to promote the Company’s brand and/or business image and to establish cordial relationships as part of the business.

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.

Interested Parties: Controllers, shareholders, directors and members of Company’s committees.

Subornment: Defined as giving or receiving a financial or other benefit in connection with the “improper conduct” of a position of trust, or a position to be performed impartially or in good faith. The subornment does not have to involve money or a payment and can

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take many forms such as a gift, generous treatment during a business trip or tickets to an event.

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

3. GOALS

The goals of this policy are:

- Establish minimum guidelines to regulate the practice of offering and/or receiving gifts, entertainment and hospitality;
- 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. PUBLICS

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

Corporate courtesy, also called gifts, entertainment and hospitality, means any item of value that you give or receive, directly or indirectly. It may be a benefit, including but not limited to goods or services, promotional products, institutional products (with Company logo), hotel accommodations, entertainment (event tickets, recreational activities etc.), Company events, meals, drinks, transportation (including upgrading seats in airline classes), gratuities, personal favors, or any other item with monetary value.

In case of receiving gifts, entertainment and/or hospitality, that is in disagreement with the guidelines of this policy, it is preferably recommended to return it and/or refuse it immediately. If it is not possible, direct the courtesy received to the Compliance Department,

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where the same will take the necessary measures. For these cases, it is recommended to send a formal thank you through an electronic mean and also an informative notice that the courtesy is not in compliance with Company's internal policy.

The practice of offering and/or receiving gifts, entertainment and hospitality must be mandatorily performed in accordance with the following criteria, in compliance with applicable laws and regulations, and always considering the most restrictive policy or procedure.

The offer and/or receipt of gifts, entertainment and/or hospitality by Contributors of the Company, Interested Parties and/or Public Agents, may only be performed if all the criteria presented below are met:

- Have no influence, directly or indirectly, on the result of operations related to the business or obtaining illicit advantages of Public Agents and/or Private entities/Individuals.
- They must be offered and/or received without any implicit or explicit obligation, reciprocity, benefits and exchange of favors, as well as for any purpose of corruption, bribery or kickback, subject to the rules set forth in this Policy.
- Not to offer and/or receive items from any Interested Party (including Public Agents and private individuals/entities), which has direct and/or indirect authority over Company's business transactions, contracts and/or regulatory decisions that are pending or are related to the Company.
- Private sphere: must be reasonable in nature, quantity and value, and therefore cannot be luxurious and extravagant when compared to the economic and social standards of the region. The acceptable limit value to offer and/or receive gifts, entertainment and hospitality is three hundred reais (BRL 300) or the equivalent in local currency, whose periodicity of distribution is not less than twelve(12) months and does not have as a goal to influence the parties involved, and does not infringe the policy of the companies involved. The offer and/or receipt of gifts, entertainments and hospitality above the amount of three hundred reais (BRL 300) or equivalent in the local currency must be submitted for approval by completing the Form available in Annex I of this Policy, which



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should be sent to the Compliance Officer, via email at compliance@marfrig.com.br.

- Public Sphere: Any contributor of the Company is strictly prohibited the giving, offering and/or receiving from Public Agents (including SIF agents), directly or through third parties, any undue advantage of any nature, whether in cash, entertainment, hospitality, gifts or any good or valuable service. No economic favor, whether in cash, gift or other kind, shall be granted directly or indirectly to Public Agents or persons holding similar offices.
- Must not be requested by a Company Contributor.
- They must be offered and/or received in an open and transparent manner.
- Must be offered and/or received, preferably, from entities, companies and bodies to which Third Parties and/or Public Agents are professionally bound and always avoid offering and/or receiving directly to individuals.
- Must be permitted and in accordance with applicable culture, laws and regulations, as well as internal policies and procedures, including third party standards of conduct and ethics.
- Contributors and Interested Parties should not accept Third Party invitations for participation in entertainment or any other type of event that is sexually contentious or involves obscenities.
- Items offered and/or received must comply with this Policy, and no cash transactions of any kind, including wire transfers, commissions or the like, may never be accepted.
- They must be adequately documented, supported by the corresponding tax receipts (or equivalent) and recorded in a timely and accurate manner (there can be no records in the books of these items by means of reimbursement of expenses, but in the appropriate accounting account that includes gifts, entertainment and hospitality).

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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 gifts, entertainment, and hospitality, and prohibited confidential, unregistered and/or uninformed operations . In addition, it is essential that these transactions are properly documented through legal evidence and corresponding reports, as well as the appropriate approvals according to the limit established in this Policy or in the business operating procedure and mandatorily guide their conduct considering the policy or procedure more restrictive.

Transactions related to the offering and/or receiving of gifts, entertainment and hospitality will be audited and monitored through reports and indicators and submitted to the Compliance Committee.

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 is a public policy.



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ANNEX I – FORM FOR APPROVAL OF GIFTS, ENTERTAINMENTS AND HOSPITALITIES.

Applicant Instructions:

- Include the complete information and identify the information that is applicable to its request;
- Complete and submit this form no later than 2 weeks before the date on which the gifts, entertainment and hospitality will be offered;
- Complete and submit this form immediately to receive gifts, entertainment and hospitality;

Marfrig Contributor Information:

Name:	<input type="text"/>	Position:	<input type="text"/>
Business Unit:	<input type="text"/>	City:	<input type="text"/>
Telephone:	<input type="text"/>	E-mail:	<input type="text"/>
Estimate approval date:	<input type="text"/>	Signature:	<input type="text"/>

Third Party Information

Corporate name:	<input type="text"/>	CNPJ:	<input type="text"/>
Department:	<input type="text"/>	State/ City:	<input type="text"/>
Name:	<input type="text"/>	CPF:	<input type="text"/>
Telephone:	<input type="text"/>	E-mail:	<input type="text"/>



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Relevant information on gifts, entertainment and hospitality:

Classification: Gift Entertainment Hospitality

Total amount of the transaction:

Total Amount per person:

Description of what is being offered and/or received:

Relationship type: Potential client or supplier
existing Client and/or supplier Public Agent or public entity

Others:

Description of the relationship with Marfrig:

Goal/ Reason for offering and/or receiving gifts, entertainment and hospitality:



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Evaluation Requirements:

1. Is the amount involved more than BRL 300.00 or the equivalent in local currency?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
2. Is there any benefit (monetary or not)?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
3. Was there a gift, entertainment or hospitality offered in the last 12 months involving this applicant and this third party?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
4. Is this offer and/or receipt intended to generate benefit, undue advantage or influence on commercial decisions of Public Agent, customer, supplier, business partner, Contributor or individual?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
5. Does this offer and/or receipt constitute the form of giving, repaying or providing personal relationship satisfaction?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
6. Does the third party have direct or indirect responsibility for making planned or pending decisions that will affect Company's interests?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
7. Does the third party have a history of reputation or unethical conduct?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
8. Can this offer and/or receipt generate conflict of interest with governmental entities and civil organizations in which there is a family bond and/or employment relationship between the parties?	<input type="checkbox"/> YES	<input type="checkbox"/> NO

APPROVALS

Approver Position	Approver Name	Signature	Date	Approved/ Denied
Financial Office				
Compliance Office				