

## 1. OBJECTIVE

Establish rules and guidelines for the disclosure and use of Relevant Information within the scope of the Company and its Controlled Companies and Associated Companies, as well as for maintaining the confidentiality of such information, while it is not disclosed.

Establish the general and conduct rules that will be used by the Company to classify information as Relevant Acts or Facts, and to disclose such information, providing, for the benefit of investors and the market in general, predictability to the conduct that will be adopted by the Company; and avoid and curb the selective dissemination of information about a Relevant Act or Fact.

## 2. APPLICATION

The rules established in this Policy apply to the Company itself, to the Controlling Shareholders, to the Administrators, to the members of the Fiscal Council and Bodies with Technical or Advisory Functions, to the Employees and Executives with access to Privileged Information of the Company and its Controlled Companies and to any Third Parties Hired by the Company who have permanent or occasional access to Relevant Information.

## 3. RESPONSIBLE MANAGERS

Investor Relations Department.

Legal, Governance, Risks and Compliance Vice-presidency

Administrative Council.

## 4. DESCRIPTION

### 4.1. Introduction

4.1.1. It is the commitment of M. DIAS BRANCO S/A INDÚSTRIA E COMÉRCIO DE ALIMENTOS (“M. DIAS BRANCO” or “Company”) to guarantee the quality and consistency of information, as well as equal treatment in access to information and readiness in relationships with the market of capital, respecting legal and regulatory requirements. M. DIAS BRANCO adopts relationship practices with its investors and the market in general based on total transparency regarding the information available regarding its activities.

4.1.2. The Investor Relations activity consists of providing corporate information to the capital market, whose target audience is made up of investors, market analysts, specialized financial press and other interested parties. The Company's communication strategy with the market is based on 3 (three) elements: mandatory reports, supplementary (voluntary) reports and information, and direct interaction with capital market agents.

4.1.3. This Policy covers the disclosure of information to the market, the filing of documents with the CVM and the Stock Exchanges, statements made in annual and quarterly reports, earnings releases, contacts between the Company and analysts, investors and the media, statements and presentations of the main executives, and information contained on the Company's IR Website and other websites

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

on the internet.

- 4.1.4. Additionally, this Policy prohibits people subject to it from discussing relevant, non-public issues or developments of the Company with any individual who does not participate in it (eg colleagues, relatives, and friends).
- 4.1.5. is also worth noting that people subject to the Policy must adhere to it, signing the respective Term of Adhesion, in the form of Annex A.

## 4.2. Communication principles

4.2.1. This Policy is based on the following general principles:

- ✓ Ethics - All people subject to this Policy must base their conduct in accordance with the values of good faith, loyalty, and truthfulness.
- ✓ Access to Information - It is essential that the Company guarantees the availability of Relevant Information with regularity and quality. It is also the obligation of people subject to the provisions set out in this Policy to ensure that the disclosure of information about the Company's asset and financial situation is correct, complete, continuous and developed through the administrators responsible for this function, and must also cover data on the evolution of their respective shareholding positions in the Company's share capital, as provided for in this Policy and in current legislation.
- ✓ Equal Treatment - Transparent, accurate and timely information constitutes the main instrument available to the investing public and, especially, to the shareholders and investors of M. DIAS BRANCO, so that they are assured of the indispensable equitable treatment. The Company's relationship with participants and opinion makers in the securities market will be uniform and transparent. The flow of information will be continuous, even in crisis situations.
- ✓ Transparency - The information made available to the investing public must be guided by transparency, that is, it must faithfully reflect the Company's operations and economic-financial situation. Any disclosure of a Material Act or Fact, or any other disclosure of information, must comply with the provisions of this Policy and current legislation.
- ✓ Freedom of Decision - Investment decisions (sale, purchase or stay) are exclusive acts of each investor, as well as the search for the best returns that must be guided by the analysis and interpretation of information disclosed to the market and never by privileged access to information .

## 4.3. Procedures for disclosing a material act or fact

4.3.1. General Provisions:

- 4.3.1.1. The purpose of disclosing a Relevant Act or Fact is to prevent the improper use of Privileged Information in the securities market by people who have access to it, for their own benefit or that of third parties, to the detriment of investors in general, the securities markets and of the Company itself.

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

4.3.1.2. Therefore, this Policy establishes general guidelines and procedures to be observed when disclosing a Relevant Act or Fact and maintaining the confidentiality of such information when not yet disclosed, with the aim of making complete and timely information on Relevant Acts and Facts related to the Company, ensuring equality and transparency of this publication to all interested parties.

4.3.2. **Disclosure Procedures:**

4.3.2.1. All information about the Company's Relevant Act or Fact must be brought to the attention of the Investor Relations Director by the Related Persons subject to the Policy, so that he, in turn, can take the necessary measures to disclose the information, in the manner provided for by law. , in the applicable regulations and in this Policy.

4.3.2.1.1. If the Related Persons subject to the Policy have personal knowledge of information that constitutes a Relevant Act or Fact and observe the omission of the Investor Relations Director in fulfilling his duty of communication and disclosure, including in the event of Article 6, sole §, of the CVM Resolution No. 44, they will only exempt themselves from liability if they immediately communicate the Relevant Act or Fact to the CVM.

4.3.2.1.2. The communication referred to in Clause 4.3.2.1.1 above is waived when there is evidence of knowledge of the Relevant Act or Fact by the Investor Relations Director and the decision not to disclose the information, taken in accordance with this Policy and the regulations applicable.

4.3.2.2. Verification of the occurrence of a Relevant Act or Fact must always consider: (i) its materiality in the context of the Company's activities and size, and not in isolation; (ii) the presence of the considerable influence criteria described in the definition of Relevant Act or Fact instructed by CVM Resolution No. 44; and (iii) the history of disclosure of Relevant Information by the Company, in order to avoid the trivialization of disclosures of Relevant Act or Fact to the detriment of the quality of the market's analysis of the Company's perspectives.

4.3.2.2.1. In case of doubt regarding the classification of information as a Material Act or Fact, the Investor Relations Director may hear the Disclosure Committee whenever he deems it necessary, which may eventually request the participation of the boards involved in the act or fact that gave rise to the potentially Relevant Act or Fact for proper verification to be carried out.

4.3.2.3. Once it is confirmed that it is a Relevant Act or Fact, the Investor Relations Director will be responsible for arranging its publicity in the securities market, with the support of his investor relations department.

4.3.2.3.1. If the Investor Relations Director deems that certain information does not conceptually qualify as a Relevant Act or Fact but understands that it is of interest to shareholders or the market in general, this information may be disclosed through a communication to the market.

4.3.3. **Deadline and Recipients:**

4.3.3.1. The disclosure of a Relevant Act or Fact will comply with the applicable legal deadline.

4.3.3.1.1. Whenever possible, the disclosure of any Relevant Acts or Facts will occur before the beginning or after the end of business on the Stock Exchanges, and, in case of incompatibility of times with other markets, the opening hours of the Brazilian market will prevail.

4.3.3.1.2. If disclosure is necessary before the opening of the trading session, it is recommended that this be

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

done at least 1 (one) hour in advance, in order to avoid delays in the start of negotiations.

4.3.3.2. Information about a Relevant Act or Fact must be communicated simultaneously:

(i) to the CVM;

(ii) to Stock Exchanges; and

(iii) to the market in general, in accordance with Clause 4.3.4.2. below.

4.3.4. **Forms of Disclosure:**

4.3.4.1. The Investor Relations Director and the Disclosure Committee will be responsible for ensuring that the Relevant Acts or Facts are disclosed in accordance with the law, applicable regulations and this Policy, in a clear and precise manner, in language accessible to the investing public, as well as ensuring for its broad and immediate simultaneous dissemination in all markets in which the Company's Securities are traded.

4.3.4.2. The Relevant Information (and the Relevant Act or Fact, as applicable) must be disclosed to the market in general, simultaneously, through:

(i) From the news portal website <http://www.valor.com.br/fatosrelevantes>;

(ii) the Company's IR Website ( [www.mdiasbranco.com.br/ri](http://www.mdiasbranco.com.br/ri)); It is

(iii) of the CVM IPE.

4.3.4.3. The disclosures provided for in this Policy must be made in Portuguese and English.

4.3.5. **Suspension of trading:**

4.3.5.1. If it is exceptionally imperative that the disclosure of a Relevant Act or Fact occurs during trading hours, the Investor Relations Director may request, always simultaneously to Market Entities, the suspension of trading in Securities issued by the Company or referenced thereto. , for as long as it deems necessary for the adequate dissemination of the Relevant Information, observing the procedures set out in the regulations published by the Market Administrative Entities. The Investor Relations Director must prove to the Brazilian Market Administrative Entities that the suspension of requested trading also occurred in foreign Market Entities.

#### 4.4. Exception to immediate disclosure

4.4.1. The general rule in relation to a Relevant Act or Fact is that it must be immediately communicated and disclosed. Any question regarding the materiality of a specific issue must be discussed in accordance with current legislation. However, there are cases in which the indistinct disclosure of Privileged Information that constitutes a Relevant Act or Fact may put the Company's legitimate interests at risk. In these situations, the non-disclosure of a Relevant Act or Fact related to the Company will be the subject of a decision by the Investor Relations Director, who may first hear the Disclosure Committee, and may submit to the CVM its decision to keep it confidential, in the form of CVM Resolution No. 44.

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

4.4.2. Without prejudice to the provisions of Clause 4.4.1 above, the Investor Relations Officer will immediately disclose the Relevant Act or Fact if the Privileged Information escapes control or if an unusual fluctuation is found in the quotation, price or quantity traded of the Securities issued by the Company or referenced to them or if the CVM decides to disclose them.

4.4.2.1. The disclosure of a Relevant Act or Fact referred to in Clause 4.4.2 above must be carried out even if the Privileged Information refers to operations under negotiation (not completed), initial negotiations, feasibility studies or even the mere intention to carry out of business.

#### 4.5. Privileged information and duty of secrecy

4.5.1. Related Persons will have the duty to (i) keep confidential the Privileged Information to which they have privileged access until its disclosure to the securities market, as well as (ii) ensure that subordinates and third parties they trust also do so, responding jointly with these in the event of non-compliance.

4.5.2. For the purposes of preserving the confidentiality referred to in Clause 4.5.1 above, Related Persons must observe and ensure compliance with the following procedures, without prejudice to the adoption of other measures that are necessary in each specific situation:

- (i) share Privileged Information strictly with those people who absolutely need to know it, observing the provisions of Clause 4.5.2.1 below;
- (ii) not discuss Privileged Information in public places or in the presence of third parties who are not aware of it, even if it can be expected that said third party cannot intuit the meaning of the conversation;
- (iii) not discuss Privileged Information in telephone conferences in which it is not possible to be sure who is actually participating;
- (iv) keep documents of any kind relating to Privileged Information, including handwritten personal notes, in a safe, cabinet or closed file, to which only people authorized to know the information have access;
- (v) generate documents and electronic files relating to Privileged Information always with password system protection;
- (vi) internally circulate documents containing Privileged Information in sealed envelopes, which must always be delivered directly to the respective recipient; and
- (vii) Do not send documents with Privileged Information by facsimile, unless it is certain that only a person authorized to know the information will have access to the receiving device.

4.5.2.1. Without prejudice to the responsibility of the person transmitting the Privileged Information, the disclosure of Privileged Information to third parties may only occur through the signing of a contractual instrument that obliges the receiving third party (i) to maintain confidentiality regarding the Privileged Information and (ii) not to negotiate Company Securities using the Relevant Information. This provision does not apply to the transmission of Privileged Information to anyone who is obliged by law to observe those duties.

4.5.3. The restrictions and prohibitions on the transmission of Privileged Information to third parties set out in this Policy include any known means or forms, including, but not limited to: (i) electronic and digital means, such as intranet, extranet, internet, means of exchanging messages, social networks of any scope; (ii) newspapers, books and magazines, notes, communications, letters or any other written form of disclosure; (iii) radio, telephone or any other form of sound communication; and (iv) communication through sound and image, television, videos, multimedia, exhibitions, classes,

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

lectures, among others.

- 4.5.4. For guidance purposes, whenever there is doubt regarding the relevance of information, you must contact the Company's Investor Relations Director in order to resolve the doubt, who may hear the Disclosure Committee whenever deems necessary, in accordance with the provisions of Clause 4.3.2.2.1. above.
- 4.5.5. Without prejudice to the provisions of this Policy, Related Persons with access to Privileged Information must base their conduct on the regulation that deals with the provision of Relevant Information and its use in trading Securities issued by the Company.

## 4.6. General Disclosure Practices

### 4.6.1. Selective Disclosure:

- 4.6.1.1. Selective disclosure - which is characterized by the disclosure of Relevant Information to any individual before the publication of such information to the investing public - contravenes this Policy, unless such individual is obliged to observe the duty of confidentiality and non-disclosure. If Relevant Information is involuntarily disclosed, the Company will immediately arrange for its disclosure in accordance with this Policy.

### 4.6.2. Spokesperson designated by the Company:

- 4.6.2.1. The Investor Relations Director is authorized to speak on behalf of the Company on matters that are related to or that may impact the perception of risk, credibility and consolidated results of M. DIAS BRANCO, whether before analysts, investors or the press .
- 4.6.2.2. Employees and Contracted Third Parties, except those formally authorized by the Company's management to speak on behalf of the Company, will be instructed not to respond, under any circumstances, to questions from investors, analysts or media professionals.
- 4.6.2.3. All Employees and Contracted Third Parties who receive, directly or indirectly, questions from investors, analysts or media professionals must immediately inform the Investor Relations Director about such questions.

### 4.6.3. Meetings with Analysts and Investors:

- 4.6.3.1. Meetings with professional entities, investors, analysts or with a selected public, in Brazil or abroad, regarding matters that may constitute Relevant Information, must be attended by the Investor Relations Director or another person appointed by him for this purpose. purpose, or have its content, which may represent Relevant Information, reported to the Investor Relations Director.
- 4.6.3.2. Prior to these meetings (or simultaneously), the Investor Relations Director will publish the material to be presented in accordance with the relevant procedure, in order to avoid the characterization of selective disclosure, as described in Clause 4.6.1.1 above. Whenever it deems it convenient, the Company will broadcast the audio of these meetings over the internet (webcast), in order to ensure wide dissemination of the matters presented and discussed.

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

4.6.4. **Considerations about Analysts:**

- 4.6.4.1. The Company may review, upon request from an analyst, the models of management earnings reports (“Earnings Releases”) or coverage reports (research and projection) only to verify the accuracy of the information in the public domain.
- 4.6.4.2. The Company will allow analysts and authorities access to its information within its time and resource limits and in accordance with the limits established in this [Clause 4.6](#). All analysts and investors will have access to the Investor Relations Director. Requests for meetings with administrators will be scheduled according to availability on the agenda.
- 4.6.4.3. The Company will not deny analysts or investors, under any circumstances, access to its public information due to the existence of negative recommendations on the Securities issued by the Company, subject to the limits established in the Clause above.
- 4.6.4.4. The Company may make the names of analysts and/or companies covering the Company available on the IR Website, without favoring any of them. Eventually, upon formal authorization from each analyst or company, the Company may make recommendations, target prices and reports prepared by said analysts and/or companies available, subject to the provisions of [Clause 4.7.4.1](#) below.

4.6.5. **Publication of the Company's Annual Report:**

- 4.6.5.1. The Company must annually publish a report presenting the operational and financial performance of the previous year, as well as any projects, strategies, benefits and socio-environmental actions aimed at employees, investors, market analysts, shareholders and the market in general (eg socio-environmental balance and report sustainability) (“Annual Report”).

4.6.6. **Information:**

- 4.6.6.1. The Company's information constitutes the notes of Relevant Acts or Facts and corporate acts that relate to notices, notices and minutes of meetings and meetings of the Board of Directors published in newspapers of mass circulation at the location of the Company's headquarters, at the location where the Company has its shares traded and in the official press in Brazil.
- 4.6.6.2. Any information must be true, complete, consistent and not misleading the investor, written in simple, clear, objective and concise language, communicating in a comprehensive, equitable and simultaneous manner for the entire market, taking care to that the information disclosed is useful for evaluating the Securities issued by the Company.

4.6.7. **Rumors:**

- 4.6.7.1. The Company will not comment on rumors or speculation in the market regarding it, except in situations in which such rumors or speculation refer to a Relevant Act or Fact that has escaped the Company's control or are causing unusual fluctuations in quotation, price or quantity traded of the Securities issued by the Company, when they will be immediately disclosed, in accordance with [Clause 4.4.2](#) above.

4.6.8. **IR website:**

- 4.6.8.1. The IR Website is an important vehicle for the Company to communicate with the investing public and

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

the market in general, so the information it disseminates must always maintain the highest standards of regularity, quality, and equity. The IR Website must be kept continuously updated and contain at least:

- (i) all of the Company's information sent to the CVM and the Stock Exchanges;
- (ii) presentations made to the investing public and transcription of conference calls;
- (iii) basic tool that makes it possible to monitor the prices of Securities issued by the Company;
- (iv) calendar of events, corporate governance practices, corporate policies and analyst estimates;
- (v) Annual report; and
- (vi) contact information for the Company's Investor Relations team.

4.6.8.1.1. Disclosures on the IR Website must be made in Portuguese and English.

4.6.9. **Company Collaboration in Investor Relations:**

4.6.9.1. All areas of the Company must promptly provide extensive information (of a strategic, operational, technical or financial nature) to the Investor Relations Director so that he, in turn, can judge, with the assistance of the Disclosure Committee, whether the matter should or not be made public.

4.6.10. **Disclosure Committee:**

4.6.10.1. The Disclosure Committee is an advisory body to the Company's Investor Relations Department, established spontaneously by the Company's Board of Directors, pursuant to Section 404 of the Sarbanes-Oxley Act, with the purpose of (i) assisting the Investor Relations Officer Investors in carrying out the functions assigned to them by this Policy and applicable regulations; and (ii) implement and continually improve internal control procedures for evaluating and certifying the Company's financial disclosures ("Disclosure Committee").

4.6.10.2. The Disclosure Committee will be composed of up to 3 (three) members, including the Director of Investor Relations, the Director of New Business and Investor Relations (non-statutory) and the Vice President of Legal, Governance, Risks and Compliance, and will have the following main responsibilities:

- (i) ensure that the Relevant Acts or Facts are disclosed in accordance with the law, applicable regulations and this Policy, in a clear and precise manner, in language accessible to the investing public, as well as ensuring their broad and immediate simultaneous dissemination in all markets in that the Company's Securities are traded;
- (ii) advise the Investor Relations Director regarding the decision on the disclosure of information to the market and the classification of information as a Material Act or Fact;
- (iii) advise the Investor Relations Director in making decisions assigned to him by the Policy or applicable regulations;
- (iv) advise the Investor Relations Director regarding non-disclosure of a Material Act or Fact, in accordance with Clause 4.4.1 above;
- (v) clarify doubts about the incidence or interpretation of the provisions of this Policy, applicable law and regulations, including the need to disclose certain information;

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ



- (vi) examine, at the initiative of the Investor Relations Director, situations of doubt regarding compliance with this Policy;
- (vii) evaluate, together with the Investor Relations Director, the accuracy and completeness of mandatory reports and publications of the Company's financial and performance information;
- (viii) periodically review this Policy and recommend any changes to the Board of Directors, whenever deemed appropriate; and
- (ix) assist the Investor Relations Director in investigating cases of violation of this Policy, bringing infractions to the attention of the Ethics Committee and the Board of Directors, as applicable.

4.6.10.3. The Disclosure Committee will meet ordinarily every 6 (six) months and extraordinarily whenever called by the Investor Relations Director, or any of its members, provided that all decisions of the Disclosure Committee will be taken by most of members, without prejudice to the prerogatives attributed in this Policy to the Investor Relations Director.

4.6.10.4. Calls will be made by electronic communication as far in advance as the subject in question requires and allows, and meetings will take place at the Company's headquarters, except when exceptional conditions recommend holding them in another location. Participation in meetings may also occur via telephone conference, video conference or any other means of remote communication, with voting permitted electronically.

4.6.11. **Specific Disclosures - B3 Novo Mercado Regulations:**

4.6.11.1. Pursuant to Article 20, sole paragraph, of the B3 Novo Mercado Regulation, in the event of the accumulation of positions of Chairman of the Board of Directors and Chief Executive Officer of the Company due to vacancy, the Company must publish a notice to the market or Act or Relevant Fact: (i) informing about the aforementioned accumulation until the business day following the occurrence; and (ii) within 60 (sixty) days from the remaining vacancy situation, informing the measures taken to cease the aforementioned accumulation of positions.

4.6.11.2. Pursuant to Article 26 of B3's Novo Mercado Regulation, the Company must disclose, through a notice to the market or Relevant Act or Fact, the resignation or dismissal of the Company's Administrators by the following business day on which M. DIAS WHITE is informed of the resignation or in which the dismissal is approved.

## 4.7. Results disclosure procedures

### 4.7.1. **Mandatory Reports:**

4.7.1.1. The mandatory reports described below (ie DFP, ITR, Financial Statements and Reference Form) must be delivered by the Company within the form and deadline stipulated by law and applicable regulations. These documents must be delivered simultaneously to the CVM (in Portuguese and, possibly, in English), to the Stock Exchanges and to the IR Website (in Portuguese and English versions).

- ✓ **"DFP"** - Standardized Financial Statements: electronic document that must be completed with data from the Financial Statements prepared in accordance with the accounting rules applicable to the

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

Company and delivered within 3 (three) months from the end of the fiscal year or on the same date of submission of the Financial Statements, whichever occurs first.

- ✓ **“ITR”** - Quarterly Information Form: electronic document that must be completed with data from the quarterly accounting information prepared in accordance with the accounting rules applicable to the Company, accompanied by a special review report, issued by an independent auditor registered with the CVM and the declaration directors under the terms of items V and VI of §1 of art. 27 of CVM Resolution No. 80 and delivered within 45 (forty-five) days from the closing date of each quarter, except the fourth quarter of the year.
- ✓ **“Financial Statements”**: the Company's financial statements, prepared in accordance with Law No. 6,404, of December 15, 1976 (Corporate Law) and CVM rules and audited by an independent auditor registered with the CVM, which must be delivered to the CVM on the date they are made available to the public, which must not exceed 3 (three) months from the end of the fiscal year, and must necessarily include: (a) management report; (b) independent auditor's report; (c) opinion of the Fiscal Council or equivalent body, if any, accompanied by any dissenting votes; (d) capital budget proposal prepared by management, if any; (e) statement by the directors responsible for preparing the financial statements in accordance with the law or the bylaws that they have reviewed, discussed and agree with the opinions expressed in the independent auditors' report, stating the reasons, in case of disagreement; (f) declaration by the directors responsible for preparing the financial statements in accordance with the law or the bylaws that they have reviewed, discussed and agree with the financial statements; and (g) the audit committee's annual summary report, if any.
- ✓ **“Reference Form”** - Annual Information: is an electronic document, prepared in accordance with the regulatory standards published by the CVM, to be updated and delivered annually, within 5 (five) months from the closing date of the fiscal year, or updated on the date ( i) the request for registration of public distribution of securities, (ii) the request for registration of a distribution program or (iii) the publication of a preliminary supplement, or, even, updating the corresponding fields, within 7 (seven) business days counting from the occurrence of any of the hypotheses indicated in art. 25, §3° of CVM Resolution No. 80.

#### 4.7.2. **Quiet Period:**

- 4.7.2.1. In accordance with current legislation and regulations, the Company will refrain from internally or publicly disclosing information about its results to those other than the professionals involved in the preparation, analysis, and approval of such financial statements in the period prior to the delivery of this information to the CVM and the Stock Exchanges (“Quiet Period”).
- 4.7.2.2. The Company will observe the Quiet Period for a period of 15 (fifteen) days prior to the date of public disclosure of its quarterly or annual results.
- 4.7.2.3. During the Quiet Period, although it is preferable to avoid meetings with investors, the Company may participate in telephone calls with investors, meetings or conferences, but will not discuss ongoing operations or indicative trends or financial results of its businesses that have not yet been disclosed.
- 4.7.2.4. Privileged Information that is characterized as a Relevant Act or Fact, and that does not directly concern the content of financial information not yet disclosed, must continue to be normally

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

disclosed to the market in accordance with this Policy.

4.7.2.5. Information on financial statements that may still undergo adjustments and that have not yet been audited and duly approved by the Company's management will not be disclosed.

4.7.2.6. Exceptionally, in the event of a leak of this information and when an atypical or fortuitous case occurs, in order to equalize the information to the market in general, the Company must inform the CVM and disclose the leaked data to the market, as quickly as possible, through the procedures established in this Policy.

4.7.3. **Earnings Releases:**

4.7.3.1. The quarterly reports will inform the target audience about the Company's operational and economic-financial performance in the quarter and accumulated in the current year (compared to the period of the previous year and/or immediately prior to the one reported), through an objective analysis of the results obtained and balance position. The Company will observe the Quiet Period, in the same terms provided for in Clauses 4.7.2.1 and 4.7.2.2 above, from the beginning of preparation of Earnings Releases until their publication.

4.7.3.2. The Annual Report will consolidate the accountability of the Company's management to its shareholders and the investing public.

4.7.4. **Projections and Estimates of Results:**

4.7.4.1. The Company will not disclose projections or estimates (guidance) of its results or future performance.

4.7.5. **Feedback to Management:**

4.7.5.1. It is the Investor Relations Director's responsibility to keep the Company's management informed about the market's perception of the Company's results, strategies and prospects.

4.7.6. **Corporate Events Calendar:**

4.7.6.1. The Company must disclose to the market and Market Entities, by December 10th of each year, an annual calendar for the following calendar year containing, at least, the dates of the events listed below:

- (i) disclosure of Financial Statements and DFP;
- (ii) disclosure of ITR;
- (iii) dissemination of the FR; and
- (iv) holding of the ordinary general meeting.

4.7.6.2. Any subsequent changes in relation to the events on the calendar already presented must be made prior to the said events taking place.

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

#### 4.8. Ways to publish results

##### 4.8.1. Newspapers:

4.8.1.1. The disclosure of the Company's annual financial results, accompanied by the respective management report (which make up the CVM's DFPs), must be done through publication in newspapers of mass circulation (as defined in the Ordinary General Meeting) and, in short, in the services wire (news distribution services) usually used by the Company, in addition to sending to the CVM and Stock Exchanges and making it available on the IR Website. However, if and when authorized by the CVM, the Company may choose to carry it out in summary form in newspapers of general circulation (in addition to the summary sent to the "wires" services), indicating the address of the IR Website where such information should be located. available in full to all investors, in content at least identical to that sent to the CVM and the Stock Exchanges. There is no obligation to publish the Company's quarterly results in newspapers.

##### 4.8.2. IR website:

4.8.2.1. The information sent to the CVM and the Stock Exchanges will simultaneously be made available on the IR Website.

##### 4.8.3. Conference Calls:

4.8.3.1. Telephone conferences will be held after the results are announced. These results discussion events must be held in Portuguese and English, and simultaneously transmitted over the Internet (webcast), in order to ensure free access to all interested parties.

4.8.3.2. Occasional telephone conferences will be held whenever necessary, at the Company's discretion.

4.8.3.3. For telephone conferences scheduled in the calendar of events, the Company will issue a notice at least 5 (five) business days in advance informing the date, time and how to access it. As the Company typically discusses financial information during such conferences, such communication will provide the address of the IR Website where such information will be available.

4.8.3.4. Analysts and investors will have access to conference calls promoted by the Company, being able to participate in the question-and-answer section. They may also, simultaneously with other interested parties, follow such telephone conferences through the IR Website. The Company will respond to the maximum number of questions within the given time.

4.8.3.5. Recordings and transcripts of all conference calls promoted by the Company will be available on the IR Website. After a period of 12 (twelve) months, the recordings and transcriptions will be placed in the "archive" section of the IR Website. All information contained in the "file" must be considered as historical data and does not constitute updated information or forecasts of the Company.

##### 4.8.4. Public Presentation of Results:

4.8.4.1. The Company must carry out, within 5 (five) business days after the release of quarterly or annual results, a public presentation on the information disclosed. Other public presentations may be made,

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

at the Company's discretion.

4.8.4.2. Public presentations must be carried out via teleconferences, as per Clases 4.8.3.1 to 4.8.3.5 above, or even through press conferences with the specialized press. In this case, such press conferences should preferably take place following teleconferences.

4.8.5. **Financial Performance Presentation Meetings (“Roadshows”):**

4.8.5.1. Observing all the fundamental principles established in Clause 4.2. of this Policy, the Company may hold Roadshows with the investing public in Brazil and/or abroad, with the aim of expanding and consolidating the Company's external image, as a transparent and proactive entity in rendering accounts to the capital market.

4.8.6. **Investor Services:**

4.8.6.1. Service to investors and market analysts is provided directly by the Investor Relations Director and/or by representatives designated by him and may be accompanied by other Company executives.

4.8.7. **Other Meetings:**

4.8.7.1. The Investor Relations Director may respond to requests from investors interested in visiting the Company, in order to discuss the financial results and strategies implemented and ongoing at the Company, always observing the fundamental principles established in Clause 4.2. above and other recommendations of this Policy.

4.9. **Procedures for communicating information about negotiations of administrators and related people**

4.9.1. The Administrators, members of the Fiscal Council and members of the Bodies with Technical or Advisory Functions of the Company must communicate to the Company, through the Director of Investor Relations, who, in turn, will communicate to the CVM and the Stock Exchanges, the ownership and negotiations carried out with Securities issued by the Company, Subsidiary Companies or the Controlling Company (which are publicly-held companies), whether in its own name or in the name of Related Persons.

4.9.1.1. The communication will take place in the form of the “Declaration of Shareholding”, as per Annex B of this Policy, and must be carried out (i) on the first business day after the person takes office, or (ii) within 5 (five) days after each trade is carried out.

4.9.1.2. The communication referred to in item (i) of Clause 4.9.1.1 above must be accompanied by a list containing the name and registration number in the National Register of Legal Entities (CNPJ) or in the Register of Individuals (CPF) of the Persons Linked to the sender of the communication. Any change in the information described in this Clause must be communicated to the Company within a period of up to 15 (fifteen) days from the date of the change.

4.9.1.3. In accordance with Clause 4.9.1 above, the application, redemption and negotiation of shares of investment funds whose regulation provides that its share portfolio is composed exclusively of shares

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

issued by the Company, Subsidiary Companies or the Controlling Company.

- 4.9.2. The Company, through the Investor Relations Director, must communicate to the CVM and the Stock Exchanges the ownership and negotiations carried out with Securities issued by the Company, Subsidiary Companies, or the Parent Company (which are publicly held companies), carried out by itself, by the Controlled Companies or by the Controlling Company.
- 4.9.3. The information described in Clauses 4.9.1 and 4.9.2 must be sent within 10 (ten) days after the end of the month in which (i) changes to positions held occur; (ii) the investiture of the position takes place; or (iii) the communication provided for in Clause 4.9.1.2 above occurs.

#### **4.10. Communication and disclosure procedures regarding the acquisition or disposal of a relevant shareholding**

- 4.10.1. Pursuant to Article 12 of Resolution No. 44, the Controlling Shareholders, direct or indirect, and the shareholders who elect members of the Company's Board of Directors or Fiscal Council, as well as any natural or legal person or group of people, acting in jointly or representing the same interest, carrying out relevant business, must forward to the Investor Relations Department, which, in turn, will forward to the CVM and the Stock Exchanges, a statement containing the information required in Annex C of this Policy immediately after being reached the following levels.
- 4.10.1.1. Relevant negotiation is considered to be the business or set of businesses through which the direct or indirect participation of the people indicated above exceeds, upwards or downwards, 5% (five percent), or multiples of this percentage, of the shares representing the share capital of the Company, also extending to the acquisition of any rights over shares and other securities issued by the Company and over any derivative financial instruments referenced in these assets, even if there is no provision for physical settlement.
- 4.10.2. In cases where the acquisition results or was carried out with the objective of changing the composition of control or the administrative structure of the Company, as well as in cases where the acquisition generates the obligation to carry out a public offering, in accordance with the applicable regulations or the Bylaws of the Company, the acquirer must also promote disclosure, at least, through the same communication channels usually adopted by the Company for the disclosure of a Relevant Act or Fact, containing the information required in Annex C of this Policy.
- 4.10.3. The Investor Relations Director, in addition to keeping on file the proof of sending and receiving of messages exchanged regarding the transactions carried out, must, as soon as the communication of acquisition or sale of a relevant stake is received, immediately forward it to the CVM and the Stock Exchanges. Values.

#### **4.11. Procedures for communicating information on the shareholding of controlling shareholders and related persons**

- 4.11.1. The Controlling Shareholders must communicate monthly to the Company, through the Investor Relations Director, who, in turn, will communicate to the CVM and the Stock Exchanges, the direct or

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

indirect ownership of the Securities issued by the Company, individually and consolidated, whether in its own name or in the name of Related Persons.

- 4.11.1.1. Communication by the Controlling Shareholders will take place in the form of **Annex B** of this Policy, and must be carried out within 5 (days) after the end of each month, even if there are no changes in shareholding positions during the period.
- 4.11.2. The information described in Clause 4.11.1.1 above must be sent by the Company to the CVM and the Stock Exchanges within up to 10 (ten) days after the end of each month.

## 4.12. Responsibilities

### 4.12.1. The Board of Directors is responsible for:

- ✓ Approve any changes and revisions to this Policy.
- ✓ Process non-compliance with the obligations and rules established in this Policy by Related Persons and their respective Related Persons, and deliberate on it.

### 4.12.2. The Investor Relations Department is responsible for:

- ✓ Monitor and enforce this Policy.
- ✓ Evaluate what information should be disclosed, in accordance with applicable rules, such as a Relevant Act or Fact or communicated to the market.
- ✓ Disclose a Relevant Act or Fact that occurred or is related to the Company's business, immediately after its occurrence, except in the case of Clause 4.4.1 above.
- ✓ Ensure the broad, simultaneous, and immediate dissemination of Relevant Acts or Facts to the market, in accordance with the law, applicable regulations and this Policy.
- ✓ Evaluate the need to request, always simultaneously to Market Entities, the suspension of trading in the Company's Securities, in accordance with Clause 4.3.5.1 above.
- ✓ Evaluate exceptional cases for immediate disclosure of a Relevant Act or Fact, in accordance with Clause 4.4.1 of this Policy.
- ✓ Monitor atypical fluctuations relating to the trading of the Company's Securities or references thereto, as well as interviewing people who have access to Relevant Acts or Facts, in order to determine whether they are aware of information that should be disclosed to the market.
- ✓ Provide the competent bodies, when duly requested, with additional clarifications regarding the disclosure of a Relevant Act or Fact.
- ✓ Communicate to the CVM and the Stock Exchanges information about negotiations by administrators and Related Persons, in accordance with Clause 4.9 of this Policy.

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

- ✓ Communicate to the CVM and adopt other measures required by regulation for the disclosure of information on the acquisition and sale of relevant shareholding, in accordance with Clause 4.10 of this Policy.
- ✓ Communicate to the CVM and the Stock Exchanges and adopt the other measures required by regulation for the disclosure of information about the ownership of the Controlling Shareholders' shareholding, in accordance with Clause 4.11 of this Policy.
- ✓ Speak out on behalf of the Company on matters that are related to or that may impact the perception of risk, credibility and consolidated results of M. DIAS BRANCO.
- ✓ Evaluate the accuracy and completeness of mandatory reports and publications of the Company's financial and performance information.
- ✓ With the assistance of the Disclosure Committee, investigate cases of violation of this Policy, bringing infractions to the attention of the Ethics Committee and the Board of Directors, as applicable.
- ✓ Clarify doubts about the incidence or interpretation of the provisions of this Policy, applicable law and regulations, including the need to disclose certain information.

**4.12.3. The Disclosure Committee is responsible for:**

- ✓ Comply with the duties listed in Clause 4.6.10.2 of this Policy.

**4.12.4. The Ethics Committee is responsible for:**

- ✓ Process non-compliance with the obligations and rules established in this Policy by Related Persons and their respective Related Persons and deliberate on it.

**4.13. Contract of adhesion**

4.13.1. Adherence to this Policy must be done by signing the Term of Adhesion ( Annex A ) to be kept at the Company's headquarters as long as its signatory maintains a relationship with the Company, and for at least 5 (five) years after its dismissal, as provided for in Article 17, §1 of CVM Resolution No. 44.

4.13.1.1. The signing of the Term of Adhesion by Related Persons will take place, as the case may be, at the time of hiring, election, promotion or transfer, or upon becoming aware of the Relevant Act or Fact, in which they will declare that they are aware of the terms of this Policy and that are forced to observe them.

4.13.1.2. The adherence of Contracted Third Parties is the responsibility of the contracting board, which must identify whether the Contracted Third Party will adhere to this Policy. If adherence is necessary, the contracting board must ensure the inclusion of a contractual clause in the contract signed with the Contracted Third Party, which requires that person to observe the guidelines of this Policy and sign the Term of Adhesion.

4.13.2. The Company, through the Investor Relations Department, will maintain at its headquarters a list of

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ



the people who sign the Term of Adhesion and their respective qualifications, indicating position or function, address and registration number in the National Register of Individuals and/or Legal Entities, updating it whenever there is any change. Whenever there is a change to this Policy, subscribers to the Terms of Adhesion must sign new terms and promptly deliver them to the Company. Such documents will be kept available to regulatory bodies.

- 4.13.3. Related Persons must declare awareness and adhere to the terms of the Policy in the manner provided for in this [Clause 4.13](#), but any omission in the declaration of awareness and adherence does not exempt Related Persons subject to the Policy from the duty to comply with it.

#### 4.14 VIOLATION OF POLICY

- 5.1. Failure to comply with this Policy will subject the offender to disciplinary sanctions, in accordance with the Company's internal rules (e.g. the Company's Code of Ethics), without prejudice to applicable administrative, civil and criminal sanctions, attributable by the competent authorities, including, but not limited to capital market regulatory bodies (e.g. CVM).
- 5.2. Without prejudice to the provisions of [Clause 5.1.](#) above, the Investor Relations Director, assisted by the Disclosure Committee, will be responsible for investigating cases of violation of this Policy, bringing infractions to the attention of the Ethics Committee and the Board of Directors, as applicable.
- 5.3. It will be the responsibility of the Board of Directors and/or the Company's Ethics Committee, as the case may be, to take the disciplinary measures that are applicable within the Company, including communication to the competent authorities and/or removal from office or dismissal of the offender.
- 5.4. Any person who, having adhered to the Policy, becomes aware of any violation of the Policy, must immediately report the fact to the Investor Relations Director, and, if applicable, he must report it to the Board of Directors and /or the Company's Ethics Committee.
- 5.5. The provisions of this Policy do not eliminate liability arising from legal requirements of third parties not directly linked to the Company and who have knowledge of the Relevant Act or Fact.
- 5.6. The Company will adopt the procedures and measures below, without prejudice to others that it deems necessary, in order to avoid and monitor possible violations of the Policy:
- (i) requirement for Related Persons to sign an Agreement of Adhesion, in accordance with [Annex A](#);
  - (ii) carrying out periodic training, the frequency and content of which will be defined by the Investor Relations Department.

#### 5. GLOSSARY

7.1. The terms and expressions listed below, when used in this Policy, will have the following meaning: **“Controlling Shareholders” or “Controlling Company”** - The shareholder or group of shareholders linked by a shareholders' agreement or under common control that exercises the power of control at M. DIAS BRANCO, under the terms of Law No. 6,404, of December 15, 1976 (Corporation Law), as amended.

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

**“Administrators”** - The statutory directors and members of the Board of Directors of M. DIAS BRANCO, members or alternates.

**“Relevant Act or Fact” or “Relevant Information”** - Any decision of the Controlling Shareholders, resolution of the general meeting or management bodies of the Company, or any other act or fact of a political-administrative, technical, business nature shall be considered or economic-financial event occurring or related to its business that may have a considerable influence on: (i) the price of the Securities issued by the Company or referenced thereto; (ii) in investors' decision to buy, sell or hold securities issued by the Company; and (iii) in the decision of investors to exercise any rights inherent to the condition of holder of Securities issued by the Company, or referenced to them. Additionally, all hypotheses listed in Article 2 of CVM Resolution No. 44 must be considered as relevant acts or facts.

**“Stock Exchanges”** - B3, as well as any other stock exchanges on which Securities issued by M. DIAS BRANCO are admitted to trading, in Brazil or abroad.

**“B3”** - B3 S.A - Brazil, Stock Exchange, Counter.

**“Fiscal Council”** - The Company’s fiscal council, when installed.

**“CVM”** - The Securities and Exchange Commission.

**“Investor Relations Director”** - The statutory director responsible for investor relations, responsible for providing all information required by legislation and regulation of the securities market, especially the CVM and Market Entities, as well as updating of the Company's registration with the CVM and for the monitoring and execution of this Policy.

**“Employees”** - Company employees who, by virtue of their roles, functions or positions at M. DIAS BRANCO, the Parent Company, Subsidiary Companies and/or Affiliated Companies, have permanent or occasional access to any Privileged Information.

**“Market Entities”** - Stock Exchanges or group of organized over-the-counter market entities in which the Securities issued by the Company are or will be admitted to trading, as well as equivalent entities in other countries.

**“Executives”** - Non-statutory directors or executives of the Company who, by virtue of their roles, functions or positions at M. DIAS BRANCO, the Parent Company, Subsidiary Companies and/or Affiliated Companies, have permanent or occasional access to any Information Privileged.

**“Privileged Information”** - Any Relevant Act or Fact that has not yet been disclosed to the market.

**“IPE”** - System for sending documents and periodic and occasional information from the CVM.

**“Sarbanes-Oxley Act”** - Law regulated on July 30, 2002, in the United States (US Sarbanes-Oxley Act of 2002), which determines corporate governance rules for companies that have securities traded on North American stock exchanges, and related disclosure and issuance of financial reports.

**“Bodies with Technical or Advisory Functions”** - The Company's committees or bodies created by statutory provision or by internal deliberations, with technical functions or intended to advise and advise the Administrators.

**“Connected Persons”** - These are people who maintain the links indicated below with Controlling Shareholders, Administrators and members of the Supervisory Board, of Bodies with Technical or Advisory

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

Functions: (i) spouse, from whom they are not judicially or extrajudicially separated; (ii) partner; (iii) any dependent included in the annual income tax declaration; and (iv) companies directly or indirectly controlled by Controlling Shareholders, Administrators, members of the Supervisory Board, Bodies with Technical or Advisory Functions and Related Persons.

“**Related Persons**” - Group of people composed of: (i) Controlling Shareholders; (ii) Administrators; (iii) members of the Fiscal Council and/or Bodies with Technical or Advisory Functions; (iv) Executives; (v) Employees; (vi) anyone who, by virtue of their role, function or position in the Parent Company, Subsidiary Companies and Affiliated Companies, has permanent or occasional access to Privileged Information; and (vii) Contracted Third Parties.

“**Investor Relations**” - The ways in which the Company relates to the capital market.

“**CVM Resolution No. 44**” - CVM Resolution No. 44, of August 23, 2021, as amended.

“**CVM Resolution No. 80**” - CVM Resolution No. 80, of March 29, 2022, as amended.

“**Simultaneously**” or “**simultaneous**” - The concept of simultaneity for the purposes of this Policy, with regard to the delivery of documents to the CVM, the Stock Exchanges and the IR Website, is equivalent to a time period of 1 (one) hour, preferably with the Stock Exchanges closed.

“**Affiliated Companies**” - Companies over which the Company has significant influence, understood when the investor holds or exercises the power to participate in decisions regarding the financial or operational policies of the investee, without controlling it, assuming significant influence when the investor holds 20% (twenty percent) or more of the voting capital of the investee, without controlling it.

“**Controlled Companies**” - Companies in which the Company, directly or through other controlled companies, holds shareholder rights that permanently guarantee it preponderance in corporate deliberations and the power to elect the majority of administrators.

“**Contracted Third Parties**” - Third parties hired by the Company who have permanent or occasional access to Privileged Information, including, but not limited to, independent auditors, securities analysts, consultants and institutions that are part of the distribution system.

“**Adhesion Term**” - Instrument of adhesion to the Policy to be signed by the Related Persons in the form of **Annex A** of this Policy.

“**Securities**” - Any shares, debentures, subscription bonuses, receipts and subscription rights, promissory notes, purchase or sale options, indices and derivatives of any kind, or any other securities or collective investment contracts issued of the Company or references to them, including derivatives, which, by legal determination, are considered securities.

“**IR Website**” - Company’s Investor Relations Page/Section on the internet ( [www.mdiasbranco.com.br/ri](http://www.mdiasbranco.com.br/ri) ).

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

## ATTACHMENTS

### a. Annex A

#### TERM OF ADHERENCE TO THE DISCLOSURE AND USE OF INFORMATION POLICY OF M. DIAS BRANCO S/A INDÚSTRIA E COMÉRCIO DE ALIMENTOS

By this instrument, for the purposes and effects of the provisions of article 17, §1°, of CVM Resolution No. 44, [insert name and qualifications] , resident and domiciled in [insert full address] , registered in the Register of Individuals of the Ministry of Finance under [●] , holder of the Identity Card [ RG or RNE] under [●] (“Declarant”), as [indicate the position, function or relationship with the company] , [insert the name of the Company, the Controlling Company, the Subsidiary Company or the Affiliated Company] limited liability company with registered office at [insert full address] , registered in the National Register of Legal Entities of the Ministry of Finance under number [●] ( “Company”), declares to have full knowledge of the rules contained in the Privacy Policy Disclosure and Use of Information of M. Dias Branco S/A Indústria e Comércio de Food (“Policy”), as approved at a meeting of the Board of Directors carried out on March 11 , 2019, a copy of which you declare to have received on this date, forcing oneself The guide your actions ever in full compliance with such rules.

The Declarant also declares that he is aware that the violation of the provisions provided for in this Policy constitutes a serious infraction, for the purposes set out in art. 11, §3 of Law no. 6,385/76, staying O offender subject to the penalties what come The to be applied for the CVM, without prejudice to disciplinary and legal sanctions that may be applied by the own Company.

The Declarant signs this Term of Adhesion in 3 (three) copies of equal content and form, at presence of 2 (two) undersigned witnesses.

[insert location], [insert signature date].

[insert declarant’s name, position and signature]

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

Witnesses:

\_\_\_\_\_  
Name:  
RG:  
CPF:

\_\_\_\_\_  
Name:  
RG:  
CPF:

**b. Annex B**

**DECLARATION OF SHAREHOLDERSHIP  
INDIVIDUAL FORM**

Administrators and Related Persons Negotiation - Art. 11 of Resolution CVM no. 44

In [insert month and year]

( ) occurred only to the following operations with values furniture (or references to them) and derivatives, in agreement with O Art. 11 of Resolution CVM no. 44. <sup>(1)</sup>

( ) no they were carried out operations with values furniture (or references to them) and derivatives, in accordance with Article 11 of CVM Resolution No. 44, and I have the following positions of values furniture (or references to them) and derivatives.

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

Emitter name (2):							
Name:				CPF/CNPJ (taxpayers):			
Qualification:							
Opening balance							
Security/derivative	Bond Characteristics (3)	Amount	% share				
			Same species/class	Total			
Month movement							
Security/derivative	Bond Characteristics (3)	Broker used	Operation (4)	Date	Amount	Price	Volume R\$ (5)
			Purchase				
			Purchase total				
			Sale				
			Sale total				
Final balance							
Security/derivative	Bond Characteristics (3)	Amount	% share				
			Same species/class	Total			

- (1) To the to fill the form, delete to the lines what no contain information.
- (2) Insert name from the Company, from the Society Controlled or from the Controller.
- (3) Issue/series, convertible, simple, deadlines, guarantees, species/class, etc.
- (4) Indicate form in acquisition or alienation.
- (5) Amount times price.

### c. Annex C

#### DECLARATION OF ACQUISITION OR DISPOSAL OF SHAREHOLDING INTERESTRELEVANT

I, [insert name and qualification, including CPF or CNPJ number, as applicable] as [ indicate position, function or relationship with the Company] of M. DIAS BRANCO S/A INDÚSTRIA E COMÉRCIO DE ALIMENTOS (“Company” ) , I DECLARE, in compliance with the discipline of CVM Resolution No. 44, that I [acquired/disposed of shares/subscription bonuses/share purchase options/share subscription rights] issued by the Company, through [indicate the broker used ], having [reached/increased or decreased/extinguished] by [●]% my participation (direct or indirect) , corresponding to [shares/subscription bonus/share purchase options/share subscription rights] representing the share capital of the Company, as described below:

I - Objective of my participation and target quantity:

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ

( ) - I declare that the acquisition carried out does not aim to change the composition of the Company's control or its administrative structure. (tick, as applicable).

II - Number of shares, subscription bonuses, as well as share subscription rights and share purchase options, by type and class, already held, directly or indirectly, by me or a person related to me:

--

III - Indicate any agreement or contract regulating the exercise of voting rights or the purchase and sale of securities issued by the Company:

--

I therefore undertake to immediately communicate to the Investor Relations Department any change in the positions reported here that represent an increase or decrease by 5% (five percent), or multiples of this percentage, in the type or class of shares representing the share capital of the Company.

[location], [date]

\_\_\_\_\_  
[insert name of declarant and signature]

## 6. CHANGE HISTORY

Revision	Latest Changes
5	- Adjustments arising from the work of reviewing and consolidating CVM rules.

PREPARED BY:

RAFAEL SAMPAIO ROCHA

APPROVED BY:

DANIEL MOTA GUTIERREZ