



**BRF S.A.**  
Companhia Aberta de Capital Autorizado  
CNPJ 01.838.723/0001-27

***Política Corporativa Antissuborno e Anticorrupção / Anti-Bribery and Anti-Corruption Corporate Policy***

***Versão Inglês / English Version***

**1 OBJECTIVE**

Establish guidelines regarding the fight against harmful practices, such as Bribery and Corruption, to be adopted by the Employees of BRF S.A. (“BRF” or the “Company”) and other professionals acting in the name of or for the benefit of the Company, both in the relationship with the Public Power, Brazilian or foreign, as well as in the Private Sector. This Policy shall be observed respecting other internal rules of BRF, as well as Brazilian and international laws, ensuring a transparent and ethical environment.

For the purposes of this Policy, underlined terms and variations thereof shall have the meanings ascribed to them in the Glossary.

**2 APPLICABILITY**

This Policy applies to all BRF Employees as well as any other Third Party located in Brazil or abroad (together, Persons). All Third Parties must assure that acts performed on behalf of BRF or relating to the provision of services, supply of materials, or procurement of BRF products meet the same integrity standards as those expected of BRF Employees.

**3 ROLES AND RESPONSIBILITIES**

The Compliance Department is responsible for clarifying any questions related to this Policy, for establishing the necessary procedures for its implementation, for ascertaining compliance and any violations of this Policy and the BRF Transparency Guide, for disseminating the guidelines of this document and guiding continuous improvement procedures of the Integrity System, as well as providing support to other departments involved in processes related to this Policy.

It is mandatory that all Persons know, respect, and disseminate the guidelines set forth in this Policy, as well as do the training sessions to which they are summoned and report to the Transparency Channel any suspected violation of Applicable Laws and Regulations, the Transparency Guide, this Policy, or other BRF policies and procedures.

**4 GUIDELINES**



BRF has as a principle the respect for Brazilian and international laws applicable to its activities, as well as its commitment to integrity in conducting its business. It is the responsibility of the Persons to ensure that actions on behalf of BRF comply with such principles, in accordance with Applicable Laws and Regulations and BRF policies, particularly the BRF Transparency Guide and this Policy.

BRF maintains its commitment to combatting all forms of Corruption and Bribery, whether in the public relations sphere (transactions involving the Public Power directly or indirectly) or in the private relations sphere (transactions between private individuals or Private Sector companies, without the involvement of a Public Agent and/or a body of the Public Power).

Accordingly, the Persons acting on behalf of BRF must comply with the guidelines set forth in the Applicable Laws and Regulations, this Policy, and other BRF rules.

The Persons should be aware of and not ignore warning signs when circumstances indicate a potential violation of this Policy. BRF encourages the communication and reporting on the Transparency Channel of any violations.

Any breach of this Policy, the BRF Transparency Guide, as well as any other BRF policy, shall be subject to internal disciplinary procedures, in accordance with the Consequences Norm, without prejudice to any applicable legal measures. In the case of Third Parties, it is also possible to terminate any relationship they have with BRF.

#### **4.1 COMMITMENT OF SENIOR MANAGEMENT**

Senior management should demonstrate support and encouragement for the Integrity System. In this sense, the Compliance Department reports directly to the Board of Directors, through the Audit and Integrity Committee, which oversees the activities conducted and the implementation of the action plans. This direct reporting gives the Compliance Department autonomy and independence and is in line with best market practices.

On a monthly basis, the Compliance Department reports to the Executive Board on the evolution of the Integrity System, status of investigations, and other topics related to the Transparency Guide and other BRF policies.

Additionally, BRF has established a Transparency Committee, which is endowed with autonomy and independence, composed of members of the Executive Board. The purpose of the Committee is to propose actions regarding the dissemination of and compliance with the Transparency Guide and related policies, as well as oversee the implementation of the Integrity System, in order to ensure effectiveness thereof and compliance therewith by all BRF Employees.



## **4.2 INSTITUTIONAL RELATIONS AND RELATIONSHIP WITH THE PUBLIC POWER**

BRF's relationships with the Public Power and Private Sector entities must be guided by ethics, formality, and transparency.

Persons who may interact, in the performance of their duties, with Public Agents or any entity of the Private Sector must respect the procedures and standards applicable to their interactions. These interactions may occur in the context of bidding processes, in the execution of administrative contracts, or in any interaction with the Public Power, even if intermediated by Third Parties, such as payment of taxes, inspections, or obtaining licenses, permits, and certificates.

For additional guidance, consult the Corporate Affairs Department and the Compliance Department, as well as the Corporate Affairs Norm, which provides guidance in relation to the Public Power.

## **4.3 GIFTS, PRESENTS AND HOSPITALITY**

The Company recognizes that Gifts, Presents, and Hospitality may help to strengthen business relationships and, in certain countries, are culturally acceptable. However, given the high risks of acts such as these being understood as practices of Bribery and Corruption, Gifts, Presents, and Hospitality may only be offered or accepted if they are in compliance with Applicable Laws and Regulations, BRF Policies, as well as policies and standards of Third Parties and the Public Power.

Gifts, Presents, and Hospitality must be granted or received in a transparent manner and should not cause any embarrassment in the event of public exposure to BRF and its Persons.

Additionally, such offers may be granted or received only if they are:

- To assist in brand promotion, such as demonstration or explanation of products and services;
- To celebrate special dates, such as city anniversaries and religious dates;
- At ceremonies or corporate events.

In the case of Hospitality, including invitation to meals, participation in events, congresses, and seminars, they may be offered or accepted, as long as the guidelines of the Gifts, Presents, and Hospitality Policy are respected.

For additional guidance, consult the Compliance Department, as well as the Gifts, Presents, and Hospitality Corporate Policy and the Corporate Affairs Norm.



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#### **4.4 DONATIONS AND SPONSORSHIPS**

Decisions made in the performance of duties at BRF shall be solely for the Company's interest. In line with its social responsibility, BRF is committed to promoting local development and the quality of life of communities, especially where it operates.

Thus, every Donation must be based on its social and cultural and/or educational and/or humanitarian purpose, without the expectation of exchange of favors or Undue Advantage, generating a positive impact on society. In the same sense, all Sponsorship must be aligned with the Company's brand advertising strategies.

To this end, Donations and Sponsorships must comply with Applicable Laws and Regulations. Implementation thereof is prohibited if there is a Conflict of Interest or the possibility that the Donation or Sponsorship may be understood as an Undue Advantage, or if there is a risk that such Donation or Sponsorship will damage BRF's reputation.

Additionally, BRF prohibits any contribution to political campaigns, elections, or candidates. The Company expects Persons to fully comply with the procedures outlined in its Corporate Donations and Sponsorship Policy. For additional guidance, please refer also to the Compliance Department.

#### **4.5 FIGHTING BRIBERY AND CORRUPTION**

BRF prohibits any act of Corruption and Bribery, including making Facilitation Payments, even if permitted by local law or in the countries in which BRF does business.

It is BRF's policy that the Persons acting on its behalf or to its benefit must reject any direct or indirect request for Undue Advantages (including but not limited to a Public Agent), including Facilitation Payments, Corruption, and Bribery.

Persons shall report to the Transparency Channel any acts that may represent a violation or potential violation of Applicable Laws and Regulations or BRF's commitment to combat Bribery and Corruption.

#### **4.6 MONEY LAUNDERING**

BRF repudiates any criminal activity and acts to ensure that its activities are not used to simulate or conceal financial resources or to finance acts of terrorism.

For additional guidance, please refer to the Compliance Department as well as the Anti-Money Laundering and Counter Terrorism Financing Corporate Policy.



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#### **4.7 THIRD PARTIES**

Third Parties must conduct their business in accordance with Applicable Laws and Regulations in the countries in which they operate, conducting their operations ethically and with integrity and complying with BRF policies, such as this Policy, the BRF Transparency Guide, and the Business Partner Code of Conduct.

The choice and maintenance of Third Parties is based on technical, financial, quality, social and environmental, and ethical criteria and compliance with Applicable Laws and Regulations. BRF has third party relationship and contracting guidelines in order to avoid any potential situation such as a Conflict of Interests, child labor, labor analogous to slavery, and environmental damage. The Company reserves the right to verify that its Third Parties are complying with the rules set out in the Business Partner Code of Conduct, as per internal criteria.

In addition, the Company conducts Reputational Analysis on Third Parties considered to be high risk (as provided for in the Corporate Standard for Continuous Reputational Analysis of Third Parties) who wish to have a relationship with or already have a relationship with BRF or its Employees. The analysis shall consist of surveys aimed at gathering information about the Third Party in order to identify possible indications of violations of Applicable Laws and Regulations or the Integrity System, as well as to determine the degree of risk linked to the engagement and any remedial measures applicable.

For additional guidance, please refer to the Compliance Department, as well as the Integrity System Corporate Norm and the Continuous Reputational Analysis of Third Parties Corporate Norm.

#### **4.8 CONFLICT OF INTERESTS**

BRF recognizes and respects Employees' right to engage in business and other financial activities outside of their work. However, it is emphasized that the Company's resources must be used solely in the exercise of their professional functions, so that the objectives of BRF are met, and never for personal or Third-Party use or gain.

A Conflict of Interest situation may result in a reduction in the level of professionalism and independence with which the Employee acts on behalf of the Company, and as a result, BRF's interests and/or reputation may be adversely affected. Therefore, Employees and Third Parties, must act impartially and objectively, not allowing private, family, or Third-Party interests to prevail over the interests of BRF.

Any Conflict of Interest situation should be reported to the Human Resources Department, the Manager, and the Compliance Department, and avoided where possible.



For additional guidance, please refer to the Compliance Department, as well as the Conflict of Interest Corporate Policy, where Conflict of Interest reporting instructions can be found.

#### **4.9 FINANCIAL STATEMENTS**

BRF has a duty to maintain adequate accounting systems and internal controls in order to ensure the accuracy and completeness of the Company's financial position. BRF shall comply with the accounting principles set forth in the International Financial Reporting Standards (IFRS) and provisions of law applicable in the preparation of its financial statements and reports, adopting internal controls in accordance with best corporate governance practices and the requirements of Sarbanes Oxley law (SOx). These statements are periodically submitted to the regulatory bodies applicable, such as the Brazilian Securities and Exchange Commission (CVM) and the US Securities and Exchange Commission (SEC).

The Company shall (i) maintain its books and accounting records to accurately reflect all transactions performed; (ii) maintain a system of internal accounting controls that provides reasonable assurance that transactions are executed as authorized; (iii) maintain the Company's accounting books and records such that the financial statements may be prepared in accordance with generally accepted accounting principles; and (iv) ensure that all corporate assets are properly controlled and accounted for.

Employees (i) are responsible for the integrity of the information, reports, and records under their control and (ii) must never make a false or misleading statement in a Company's record or to any person, including internal or external auditors, regarding the Company's financial activities and various business activities.

For additional guidance, please refer also to the Controllership Department and the Internal Risks and Controls Department.

#### **4.10 DUE DILIGENCE IN M&A PROJECTS**

BRF conducts M&A Projects for companies with which it is considering a business unit merger, acquisition, or sale in order to confirm that the prospective business partner has a history of integrity and has not been or is not currently involved in illicit business practices, such as Corruption, Money Laundering, and/or financing terrorist activities.

Each M&A Project must follow the guidelines and steps outlined in the Corporate M&A Project Standard to ensure the correct guidance and uniformity in project evaluations, thus enabling better decision-making in the completion of the deal.

For additional guidance, please refer to the Corporate Norm for M&A Projects.



#### **4.11 TRAINING**

The Company will provide training on the BRF Transparency Guide and on content related to the Integrity System to all Employees, with a scope and frequency to be defined by the Compliance Department. All Employees shall participate in training when summoned by the Compliance Department. Third Parties may also be invited to attend training sessions, at the discretion of the Compliance Department and the requesting area.

For additional guidance, please refer to the Compliance Department.

#### **4.12 CONTINUOUS IMPROVEMENT**

BRF has as a principle compliance with Applicable Laws and Regulations and reiterates its absolute commitment to integrity, safety, and quality throughout its production chain and in its institutional and commercial relations.

For the constant improvement of the Integrity System, periodic risk assessments are performed, taking into account the market characteristics where BRF operates, location of units, local culture, history of corruption, level of state regulation, and interaction with public agencies.

In addition, through monitoring by senior management and advisory committees, as well as internal and external audits, the effective implementation of the Integrity System is monitored, which enables identification of possible failures that may require corrections and improvements.

Finally, the Compliance Department often monitors the effectiveness of its policies by conducting operational controls.

For additional guidance, please refer to the Compliance Department, as well as the Integrity System Corporate Norm.

#### **4.13 NON-COMPLIANCE OF THIS POLICY**

The persons for whom this Policy is intended are advised that breach thereof, as well as breach of Applicable Laws and Regulations and other BRF policies, such as the BRF Transparency Guide, may be subject to internal disciplinary procedures as per a Consequence Norm, without prejudice to any applicable legal measures.

Any omissions or exceptions to this Policy shall be reported and resolved on by the Compliance Department and/or the BRF Transparency Committee, as appropriate.



In addition, seeking to uphold the Company's ethical standards and monitor business relationships with Third Parties, as well as assist in the prevention and detection of all forms of Corruption, BRF supports and encourages the Persons to report any practices that may represent a violation or potential violation of this Policy, the Integrity System, or those that are in violation of applicable Brazilian and foreign laws and regulations.

Complaints should be submitted to the Transparency Channel, made available by BRF at the domains below.

- <https://www.brf-global.com/sobre/etica-e-integridade/canal-de-transparencia/>
- [www.compliance.brf.com](http://www.compliance.brf.com)

It is possible to submit complaints via telephone, website, or e-mail. In countries where laws and regulations so permit, anonymous complaints are also possible.

When submitting a report, complainants should submit as much detail as they are aware of in order to assist in the investigation.

BRF strongly condemns any form of retaliation against whistleblowers who have filed a complaint in good faith and with responsibility, even if their complaint proves to be unfounded, as set forth in the Reporting to the Transparency Channel Corporate Policy.

BRF, through the Compliance Department, undertakes to investigate complaints received independently, cautiously, and responsibly, in a fair and impartial manner, and to take appropriate disciplinary and/or legal action, when necessary.

## **5 REFERENCE DOCUMENTS**

### **5.1 ANTI-BRIBERY AND ANTI-CORRUPTION LAWS AND REGULATIONS**

- Brazilian Federal Law No. 12,846/2013, which sets forth provisions regarding the administrative and civil liability of legal entities for the commission of acts against the Public Power, Brazilian or foreign, and provides for other measures.
- Decree No. 8,420/2015, which sets forth the regulations for the Anti-Corruption Law.
- Decree-Law No. 2,848/1940, which instituted the Brazilian Penal Code.
- The American Foreign Corrupt Practice Act, of December 19, 1977.
- The UK Anti-Bribery Law, of April 8, 2010.





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- The Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of the Organization for Economic Cooperation and Development, of May 23, 1997.
- The United Nations Global Pact, of July 26, 2000.
- The Business Pact for Integrity and Against Corruption, of June 22, 2006.

## **5.2 INTERNAL REFERENCE POLICIES (BRF POLICIES)**

- CE 01.1.100 – *Manual de Transparência da BRF / BRF Transparency Guide.*
- CE 01.1.102 – *Código de Conduta de Parceiros de Negócio da BRF / Code of Conduct for BRF Business Partners.*
- CP 28.1.001 – *Política Corporativa de Brindes, Presentes e Hospitalidade / Gifts, Presents and Hospitalities Corporate Policy.*
- CP 28.1.002 – *Política Corporativa de Denúncias ao Canal de Transparência / Corporate Policy of Reporting to the Transparency Channel.*
- CP 28.1.004 – *Política Corporativa de Doações e Patrocínios / Donations and Sponsorships Corporate Policy.*
- CP 28.1.005 – *Política Corporativa de Conflito de Interesses / Conflict of Interests Corporate Policy.*
- NC 11.1.006 – *Relacionamento Institucional.*
- *Política Corporativa de Prevenção à Lavagem de Dinheiro e ao Financiamento ao Terrorismo.*
- *Política Corporativa de Prevenção a Práticas Anticoncorrenciais.*
- *Política Corporativa de Licitações e Contratos com o Poder Público.*
- NC 28.1.008 – *Sistema de Integridade / Integrity System.*
- NC 28.3.001 - *Análise Reputacional Contínua de Terceiros.*
- NC 28.3.003 – *Diretrizes para Aplicação de Consequências.*
- *Norma Corporativa de Projetos de M&A / M&A Projects Corporate Norm.*



## **6 FINAL PROVISIONS**

This document is valid as from the date of its issue and shall be modified at any time and discretion.

Individuals violating these rules will be subject to the legal/disciplinary applicable measures, to be determined by the BRF competent administrators.

It will be incumbent upon the editor area to clarify any possible doubts, establish the procedures required for implementation, checking and dissemination of the rules mentioned in this document.

## **7 APPROVALS**

<b>RESPONSIBLE</b>	<b>AREA / DEPARTMENT</b>
<b>DRAFTING</b>	Compliance Department
<b>APPROVAL</b>	Transparency Committee

## **GLOSSARY**

**Applicable Laws and Regulations:** Local and global anti-bribery and anti-corruption laws and regulations, as well as conventions/pacts (Applicable Laws and Regulations), which include, but are not limited to, Brazilian Federal Law No. 12,846/2013, Decree No. 8,420/2015, and Decree-Law No. 2,848/1940, the United States Foreign Corrupt Practices Act, of December 19, 1977, the United Kingdom Anti-Bribery Act, of April 8, 2010, the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions of the Organization for Economic Cooperation and Development, of May 23, 1997, the United Nations Global Compact, of July 26, 2000, and the Business Pact for Integrity and Against Corruption, of June 22, 2006.

**BRF or the Company:** Refers to BRF S.A., as well as all of its Brazilian or international subsidiaries.

**Bribery:** An act of misconduct consisting of inducing someone to perform or refuse to perform a particular act through an offer, promise, donation, or solicitation of Undue Advantage, directly or indirectly, in violation of Applicable Laws and Regulations or BRF Policies.

**Conflict of Interests:** Is characterized by the interference of an Employees' personal interests, directly or indirectly, in the decision-making, evaluation, or performance of their professional duties. Such situations may be incompatible with the interests of the Company.



**Corruption:** BRF, based on applicable laws and regulations, conceptualizes Corruption as:

- Promising, offering, or giving, directly or indirectly, undue advantage to a Public Agent, or to a third party linked to a Public Agent;
- Shown to be financing, funding, sponsoring, or otherwise subsidizing the commission of the illegal acts committed by Public Agents;
- Shown to be using any intermediary individual or legal entity to conceal or disguise one's real interests or the identity of the beneficiaries of such acts performed;
- With respect to bids and contracts: (i) frustrate or defraud, by agreement, combination, or otherwise, the competitive nature of public bidding; (ii) prevent, disrupt, or defraud the performance of any act of a public bidding procedure; (iii) removing or trying to remove any bidder, by means of fraud or by offering an advantage of any kind; (iv) defraud a public bid or contract arising therefrom; (v) fraudulently or irregularly create a legal entity to participate in a public bid or enter into an administrative contract; (vi) fraudulently gain an advantage or improperly benefit from modifications or extensions of contracts with the Public Power, without authorization by law, in the public call for bids or in the respective contractual instruments; or (vii) manipulate or defraud the economic and financial balance of contracts with the public administration;
- hindering any investigation or inspection by public agencies, bodies, or agents, or interfering in their activities, including in the context of regulatory agencies and supervisory entities of the national financial system.

**Donation:** Shall consist of the transfer by BRF of assets or benefits to entities (whether public or private, for profit or non-profit), whether in the form of financial resources, human resources, goods, or services free of charge, or, further, of products. All activities performed as part of BRF's social responsibility program will be considered contributions or donations of any kind for the purpose of this Policy.

**Employees:** Are all people employed by BRF who work at all levels of the organization, including managers, senior executives, executives, directors, employees, internal consultants, interns, apprentices, trainees, home workers, part-time workers and workers for a fixed term, and occasional workers.

**Facilitation Payments:** Are typically unofficial sums paid to receive preferential treatment in, secure, or expedite a routine government action by a Public Agent.

**Fraud:** Is understood to be any mechanism for obtaining improper advantages by attempting or misleading someone, thus being any unlawful or dishonest action, with or without involvement of Employees, for the purpose of guaranteeing one's own benefit or benefit for third parties, with or without prejudice to the Company or its Persons.



**Gift:** Item that (i) has no commercial value and is distributed as a courtesy, advertisement, or customary advertisement; (ii) bears the logo of the legal entity that granted the Gift; (iii) is of a general nature, that is, it is not intended to exclusively ingratiate a particular person; and/or (iv) was produced by the Company. Examples: calendars, planners, pens, key chains, hats, t-shirts, and others.

**Hospitality:** Includes the payment of expenses related to travel (air, land, and/or sea), lodging, transfer, tickets, registrations, and meals for participating in trips, such as seminars, training, technical updating events, etc.

**Integrity System:** Is the Compliance program implemented at BRF, taking into account the parameters and guidelines of the Applicable Laws and Regulations, CGU Ordinance 909/15, CVM Instruction 586/2017, as well as the specificities of the sector of performance, the risks to which company is subject, methodologies, and best market practices.

**Manager:** Is the immediate leader of Employees, to whom they report and who is responsible for overseeing their activities.

**M&A Projects:** Refers to any acquisition or sale of full or partial equity interests in companies or operating assets, mergers, investments, and partnerships, including joint venture operations.

**Money Laundering:** Consists of the commission of criminal activities aimed at transforming proceeds from illegal activities into proceeds of an apparently legal origin by concealing or disguising (by action or omission) the nature, origin, location, disposition, movement, or ownership of property, rights, or valuables derived from, directly or indirectly, a criminal offense.

**Persons:** All BRF Employees and Third Parties.

**Persons Linked to Public Agents (PPEs):** Are the following individuals and legal entities, related to Public Agents:

a) Their relatives, in a direct line, to the second degree (grandparents, parents, grandchildren), spouse, companion, stepson and stepdaughter;

b) Their close employees: (i) persons with whom a Public Agent maintain a company or joint ownership or ownership in companies, with or without legal personality, whether they are proxies or have some other close relationship within public knowledge; (ii) persons who hold control of companies or businesses with or without legal personality, known to have been created for the benefit of a Public Agent;

c) Companies in which Public Agents and/or individuals linked with them have a direct or indirect interest, or from which they receive benefits of any kind.



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**Present:** Item with commercial value distributed in a given manner (therefore not indistinctly as a Promotional Giveaway). Presents also include entertainment items such as dinners and tickets or invitations to sporting and music events, etc.

**Private Sector:** For the purposes of BRF Policies, are any private companies or industry associations, unions, institutes, federations, non-governmental organizations (NGOs), political parties (Brazilian and foreign), sports-related committees (IOC, COB, FIFA, etc.), among others of the same nature.

**Public Agent or Politically Exposed Person (PPE):** For the purposes of this Policy, are those who have exercised or exercised in the last 5 years, temporarily or permanently, with or without remuneration, in Brazil or abroad:

- a) by any form of investiture or link, mandate, concession, position, employment, or function in the Public Power, or where they exercise significant influence on decision-making through the law or participation in the Public Power;
- b) political party leaders, as well as political representatives and candidates for public office in the last election (municipal, state, district, and federal);
- c) leaders and representatives of public international organizations, such as the United Nations or the World Trade Organization.

**Public Power:** For the purposes of this Policy, the term Public Power is broadly defined to include, but is not limited to:

- Bodies of the direct, indirect, or foundational administration of any of the Powers of the Federal Government, the States, the Federal District, the Municipalities, a Territory (be it executive, legislative, judicial, or administrative), government-owned companies, mixed economy companies, or public service concessionaires, including instrumentalities, regulatory agencies, customs, public foundations, notary offices, electricity, water, and gas distribution companies, companies with public-private partnership contracts, public schools, public universities, public health facilities, police stations, military entities, local tax offices, issuers of permits, approvals, government licenses, and visas.

- International public organization or any international department or agency (e.g., United Nations (UN), International Monetary Fund (IMF), World Bank, etc.).

**Sponsorship:** A formal instrument that provides financial resources, human resources, services, or products from BRF to projects and activities of third parties, with the purpose of advertising actions, strengthening concepts, adding value to the brand, generating recognition, or broadening the sponsor's relationship with its stakeholders. Sponsorship is therefore an "investment" strategy as the Company aims to achieve a return through the sponsorship.

**Third parties:** Are all those who provide services to BRF, have a business relationship with the Company, or act on its behalf or for its benefit (with or without power of



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attorney), such as customers, suppliers, service providers, integrated producers, brokers, and business partners. This concept also includes the members of the Board of Directors and the Audit and Advisory Committees.

**Transparency Channel:** Is an independent channel, managed by a third party and/or the Compliance Department, and allows reports to be sent at any time by the Persons, through the various communication channels available, ensuring anonymity to whistleblowers whenever they wish not to identify themselves.

**Undue Advantage:** For the purpose of this Policy and in general terms, Undue Advantage is the offering of anything of value in order to receive consideration for any preferential or more favorable treatment in obtaining or maintaining contracts, services, goods, or business, or to influence relationships, public or private, in any way. “Any thing of value” may be monetary valuables, such as cash, gift cards, debt repayments, loans, and contributions, and assets, services, valuables, Presents and Hospitality, products, or goods granted at a discount or free of charge, or exchange of favors, such as job offers, appointments to public office, business opportunities, consulting, etc.