



Política Corporativa de Conflito de Interesses / Conflict of Interests Corporate Policy

Versão Inglês / English Version

1 OBJECTIVE

Establish guidelines regarding Conflict of Interests situations, in addition to the definitions contained in the BRF Transparency Manual, to be adopted by BRF S.A. Employees (“BRF” or the “Company”) and other professionals acting on behalf of or for the Company's benefit. This Policy shall be observed respecting other internal rules of BRF, as well as Brazilian and international laws, ensuring a transparent and ethical work 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 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

3.1 COMPLIANCE DEPARTMENT

The Compliance Department is responsible for: (i) advising on the correct handling of the Conflict of Interests situations identified; (ii) clarifying any questions related to this Policy; (iii) establishing the procedures and instructions necessary for the implementation of this Policy; (iv) communicating and training Employees about the rules defined in this Policy; (v) monitoring compliance with this Policy; (vi) keeping a record of cases of Conflict of Interests that come to its; and (vii) submitting for the deliberation of the BRF Transparency Committee any omissions in or exceptions to this Policy.

3.2 BRF's EMPLOYEES

It is the duty of BRF Employees to act in an ethical, impartial, and objective manner, in the best interest of the Company.



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 Manual, this Policy, or other BRF policies.

It is also the duty of the Employees to declare to their Manager, the Human Resources Department, and/or the Compliance Department any real, potential, or apparent Conflicts of Interests in which they are involved, even if not provided for in this Policy, as well as to complete the Conflict of Interests Declaration Form for Employees.

3.3 HUMAN RESOURCES DEPARTMENT

It is the responsibility of the Human Resources Department to (i) advise Employees on the reporting of Conflict of Interests situations identified; (ii) define, as directed by the Compliance Department, the correct handling of the conflict situations reported; (iii) keep in the Employees' records the conflict situations reported; and (iv) apply the appropriate disciplinary measures in the event of non-compliance with this Policy, together with their Manager.

3.4 BRF MANAGERS

Process, monitor, and ensure the appropriate declaration of Conflict of Interests situations identified in their respective areas to the Compliance and the Human Resources Departments, as appropriate (via email, Form, or Transparency Channel).

3.5 CORPORATE REPUTATION DEPARTMENT

It is incumbent on the Corporate Reputation Department, in cases of disclosure or sharing of BRF information at events, seminars, and lectures, to authorize the participation and the material used.

3.6 TRANSPARENCY COMMITTEE

It is incumbent upon the Transparency Committee (i) to approve and revise this Policy and its amendments to adapt its purpose; (ii) monitor compliance with this Policy and the Company's other procurement policies, and (iii) to decide on transactions involving Conflict of Interests situations brought to its attention by the Compliance Department.



Together with the Compliance Department, the Transparency Committee shall be notified in cases of omissions or exceptions to the Policy, in order to decide on the best solution to be adopted.

4 GUIDELINES

4.1 CONCEPT AND GENERAL ASSUMPTIONS ON CONFLICT OF INTERESTS

A Conflict of Interests may be defined as an interference of an Employees' personal interests, directly or indirectly, in order to influence the decision-making, evaluation, or performance of their professional duties. Conflict of Interests may result in improper decision-making or failure to perform professional responsibilities to the detriment of the Company's interests.

A Conflict of Interests situation may result in a reduction in the level of professionalism and independence with which Employees must act in the performance of their duties, which may adversely affect the outcome of their work, as well as affect their reputation and that of BRF.

Employees must act impartially and objectively, always in the best interests of BRF, not allowing the private interests, their own interests, or interests of Close Family Members or Third Parties to prevail over the interests of BRF. If Employees perceive a possible Conflict of Interests, they should withdraw from the situation and/or refrain from participating in the decision-making and inform their Manager, the Compliance Department, or the Human Resources Department.

Conflict of Interests may be considered real, potential, or apparent *:

- **Real:** A situation in which there is indeed a clear Conflict of Interests. In this case, for example, there could be a clear Conflict of Interests if an Employee, in charge of deciding to hire a Third Party, were to hire, without the due selection process, a company that he controlled in order to provide services.
- **Potential:** A situation that has not yet become a real conflict, but there is a possibility that there will be some change in the situation and a conflict will appear in the future. Potential Conflict of Interests could, for example, be created by hiring a Third Party that is a Close Family Member of an Employee through the appropriate selection process. In this case, the assessment of whether or not there is a real Conflict of Interests will be conducted on a case-by-case basis, as it depends on the circumstances of the specific situation.
- **Apparent:** a situation in which a person could deduce that a Conflict of Interests exists, even if it does not actually exist. The situation may cause other people to perceive it as being a lack of impartiality or that the Company's interests have not been respected. This type of Conflict of Interests could be observed, for example, if an Employee has a



Close Family Member without decision-making power, working at a Third Party, without interacting with BRF on a day to day basis.

* **NOTE:** This Policy does not exhaust all Conflict of Interests situations that may arise, and, in the event of doubt, our Persons should always contact their Manager, the Compliance Department or the Human Resources Department.

Employees and the Third Party acting on behalf of or for the benefit of BRF should avoid situations that may create, or even appear to create, any conflict between their personal interests and those of BRF. Any Conflict of Interests situation, whether real, apparent, or potential, should be declared (see item 4.5), and where possible avoided.

4.2 APPROVAL OF COMMERCIAL TRANSACTIONS IN CONFLICTS OF INTERESTS

BRF encourages an open and transparent dialogue, in order that each Conflict of Interests situation be properly addressed, evaluated, and resolved by the areas responsible.

Business transactions in Conflict of Interests situations may be conducted and approved provided that: (i) all requirements of the internal procurement policies and other related policies established by the Company are observed and met; (ii) are performed under Market Conditions, taking into account, among other elements, the price, technique, and quality of the services or products procured; and (iii) the person who is in a Conflict of Interests situation no longer participates in the decision-making process involving negotiation, procurement, or even contract management, once signed.

In addition, the Compliance Department should be consulted since, in certain situations involving leadership positions, the case should be resolved by the Transparency Committee.

4.3 RELATED PARTIES

The rules for declaration of Related Parties and for approval of a Transaction with Related Parties are defined in the CP 28.1.006 - Related Party Transactions Policy. All Key Persons* in management should know the Related Party Transactions Policy.

* Board and Committee Members, Chief Executive Officer, Vice-Presidents, and Directors.

4.4 TRADE UNION RELATIONS



The rules regarding Trade Union Relations and Employees, who carry out activities in Trade Unions or similar entities, shall be defined by the Union Relations area.

4.5 PROCEDURE FOR DECLARATION IN THE EVENT OF CONFLICT OF INTERESTS

4.5.1 BRF's Employees

When faced with a Conflict of Interests situation, Employees must immediately: (i) inform their immediate Manager, the Compliance Department, and the Human Resources Department of the Conflict of Interests and (ii) Complete the **Conflict of Interests Declaration Form for Employees**, and address it to the Compliance and the Human Resources Departments for registration and handling of the matter. The absence of this declaration will be subject to the application of appropriate measures, in accordance with the Corporate Norm Consequence Enforcement Guidelines.

Employees also have a duty to update their declaration via the Form as necessary, as well as to report to the departments described above in advance any change in position, role, or function that may constitute a Conflict of Interests.

In addition, the Employee **MAY NOT**:

- Allow Close Family Members or close relatives to work as their direct report or even interfere with the selection or promotion processes conducted by the Human Resources Department. In this case, therefore, an Affective Relationship between persons in the same department in which one person is hierarchically superior to another is also prohibited;
- Participate in the hiring of Third Parties and in the management of the contract, if the Employee has any links with said Third Parties;
- Provide, on their own or through Close Family Members, services to Third Parties who maintain relations with BRF;
- Assume, directly or indirectly, the status of partner, manager, or owner of Third Parties that maintain a relationship with BRF;
- Provide services to Third Parties during working hours, or through the use of BRF facilities, material, media, or equipment;
- Pass on information about BRF or its direct and indirect competitors, which is not public;
- Assume, directly or indirectly, the status of partner, officer or director, creditor, authorized investor, consultant, or other position, with a direct or indirect competitor of BRF, when such condition assures to the Employee the power to direct the activities of the competitor, in an occasional or continuous manner.

The above list is illustrative, such the Employees have a duty to report any situation that may influence their professional activities or that may constitute Conflicts of Interest, although not provided for in this Policy.



Persons may be related to and have a personal link to, or an Affective Relationship, provided that: (i) situations are reported and dealt with by the Human Resources Department, their Manager, and the Compliance Department; and (ii) there is no involvement of the Employee in the decision-making process of hiring the Third Party or Close Family Member.

If the Conflict of Interests includes Key Management Persons or Related Parties, it shall be treated in accordance with the rules of the BRF Related Party Transactions Policy.

4.5.2 Third Parties and Integrated Producers

Third Parties or Integrated Producers shall disclose any Conflicts of Interest that may occur prior to the completion of the procurement or engagement process via the **Third-Party Conflict of Interests Declaration Form**.

Potential Conflicts of Interest with Integrated Producers should also be reported by completing the **Integration Compliance Questionnaire**.

If the Third Parties or Integrated Producers do not report a Conflict of Interests, Employees have a duty to report situations within their knowledge involving such Third Parties or Integrated Producers.

4.6 POSSIBLE CONFLICT OF INTERESTS SITUATIONS

4.6.1 Activities Related to the Engagement of Third Parties

Third party engagements must be done impartially, objectively, and in the best interest of BRF.

Below are some examples of situations that may constitute a Conflict of Interests involving the engagement of a Third Party that **ARE NOT ALLOWED**:

- Employees exercising influence over the Procurement area to hire Third Parties who have a link with their Close Family Members;
- Members of the Board of Directors or Advisory Committees of BRF exercising influence in the engagement of Third Parties, with whom they have a business or family relationship;
- Employees exercising influence over the management of a contract with a Third Party who employs a Close Family Member;
- An Employee who discloses confidential Company information to a Third Party that seeks to do business with BRF;
- An Employee who receives an invitation to congresses, seminars, or training from a Third Party who is participating in an engagement or renewal process, with expenses paid by the Third Party (for more details, see also Gifts, Presents, and Hospitality Corporate Policy).



4.6.2 Participation in Third Parties and Relationship with Competitors

BRF does not authorize Employees to act as consultants, owners, partners, or managers, directly or indirectly, of Third Parties with contracts with BRF or that are competitors of BRF.

Below are some examples of situations prohibited by the Company, which may constitute a Conflict of Interests:

- An Employee being a partner of a Third Party and being responsible for negotiating, managing the contract, or overseeing the respective Third Party;
- Diverting to themselves or any Third-Party business opportunities of which they become aware due to their position;
- Sharing of the Company's strategic information by Employees who have Close Family Members or a person with whom they have an Affective Relationship working for a direct or indirect competitor of BRF;
- A BRF consultant who holds relevant strategic information simultaneously providing services to competitors of BRF, without express permission of BRF, when there is a restriction in this regard in the contractual instrument.

4.6.3 Matters Related to the Human Resources Department

Employees may appoint Close Family Members or persons with whom they have Affective Relationships to participate in BRF's selection, recruitment, and hiring processes. However, it is essential that the potential Conflict of Interests be reported to the Human Resources Department and the hiring department prior to the appointment. In addition, the Employee must not participate in the decision-making process of selection and hiring, as well as have any influence on the process. Managers may not have Close Family Members or persons with whom they have Affective Relationships as their subordinates. Cases like these should be reported and evaluated by the Human Resources Department.

In addition, Employees may not favor, influence, or encourage the promotion of persons who are Close Family Members or with whom they have Affective Relationships.

Below are some examples of situations, prohibited by the Company, which may constitute a Conflict of Interests:

- BRF Employee involved in the recruitment, promotion, or evaluation of Close Family Members or persons with whom they have an Affective Relationship;
- BRF Managers request tampering with official Company documents in order to benefit a Close Family Member or person with whom they have an Affective Relationship;
- A Director maintains an Affective Relationship with a subordinate in his department; and
- A BRF Auditor audits the activities of another Employee with whom the Auditor has an Affective Relationship or of whom is a Close Family Member.



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4.6.4 Matters Related to the Public Power and Relationship with Public Agents (Politically Exposed Persons – PPE).

Interaction with the Public Power must take place in a full and transparent manner and in accordance with the guidelines of the Corporate Standard for Institutional Relations.

BRF Employees who are Public Agents or Persons Linked to Public Agents must declare such condition to their immediate Manager, the Human Resources Department, and the Compliance Department by completing and submitting the **Public Agent or Link with Public Agents Declaration Form for Employees**. The hiring of new Employees who are Public Agents or Persons Linked to Public Agents may only be done after approval by the Compliance and the Human Resources Departments. New Employees must declare such condition to the Human Resources Department.

The hiring of Third Parties, whose partners or officers and directors are Public Agents or Persons Linked to Public Agents, must also be declared by completing and submitting the **Public Agent or Link with Public Agents Declaration Form for Third Parties** and may only be done after approval by the Compliance Department.

Below are some examples of situations that may constitute a Conflict of Interests within the scope of the relationship with the Public Power and should necessarily be evaluated by the Compliance and the Human Resources Departments:

- Hiring a former Public Agent for strategic functions in the Company;
- Hiring Public Agents who used to work in a body or entity of the Public Power which exercises supervisory powers over BRF, to provide services, consulting, or similar activities; and
- Hiring Persons Linked to Public Agents who work in a body or entity of the Public Power which exercises supervisory powers over BRF, to work at BRF or provide services, consulting, or similar activities.

4.6.5 Outside Activities

BRF Employees may work in secondary activities in other private institutions, paid or unpaid, provided that they do not represent a Conflict of Interests for the Company, are performed outside of working hours, and without the use of BRF resources. Employees, in the exercise of their secondary activities, should avoid the establishment of business with Third Parties, that is, with people who maintain a business relationship with BRF.

Disclosure or sharing of BRF information at events, seminars, and lectures may only be done with the permission of the director of the department in which the Employee is a part. The material used must be approved by the Corporate Reputation Department. In the case of events where the Employee will represent and/or speak on behalf of BRF, the Corporate Reputation Department should be consulted in advance.



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4.7 FORMS

Below the forms available at Company's intranet:

Employee Conflict of Interests Declaration Form: to be completed by Employees in order to report Conflict of Interests.

Third Party Conflict of Interests Declaration Form: to be completed by Third Parties in order to report Conflict of Interests.

Public Agent or Link with Public Agents Declaration Form for Employees: to be completed by Employees in order to report link with Public Agent.

Compliance Questionnaire for Integration: to be completed by members in order to report Conflict of Interests.

4.8 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.

- 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 APPLICABLE LAW AND REGULATIONS

- Law 12,813/2013, which deals with Conflicts of Interests in the exercise of an office or employment of the Federal Executive.

5.2 RERECENCE INTERNAL POLICIES

- CE 01.1.100 – *Manual de Transparência BRF / BRF Transparency Manual.*

- CP 28.1.001 – *Política de Brindes, Presentes e Hospitalidade / Corporate Gifts, Presents, and Hospitality Policy.*

- CP 28.1.006 – *Política de Transações com Partes Relacionadas / Related Party Transactions Policy.*

- CP 28.1.010 – *Política Corporativa Antissuborno e Anticorrupção / Anti-Bribery and Anti-Corruption Corporate Policy.*

- CN 11.1.006 – *Relacionamento Institucional (Corporate Affairs).*

- CN 28.3.003 - *Diretrizes para Aplicação de Consequências (Consequence Enforcement Guidelines).*

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

RESPONSIBLE	AREA / DEPARTMENT
PREPARATION	Global Compliance Department
REVISION	Executive Committee, Transparency Committee, and Advisory Committees to the Board of Directors
APPROVAL	Board of Directors

GLOSSARY

Affective Relationship: BRF considers it to be an affective relationship when there is an intimate or loving personal relationship, regardless of whether there is a continuous relationship or stable union.

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

Close Family Members: Are those family members of a particular person who can be expected to influence or be influenced by that person in that member's business with BRF and include: (a) children and/or dependents of such person; (b) the spouse or partner of such person; (c) the children and/or dependents of the spouse or partner of such person; (d) ancestors by blood or marriage (such as stepparents, stepmothers, in-laws) of such person; siblings and brothers and sisters-in-law.

Conflict of Interests: Is characterized by the interference of a Person's personal or secondary interests, directly or indirectly, in the decision-making, evaluation, or performance of their professional duties, diverging, as a rule, from the Company's interests and principles. Conflicts of Interest may, under this Policy, be real, potential, or apparent, as well as internal, public, or private.

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

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.



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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.

Integrated Producers: Poultry and/or pork farmers with an active Contract for Integrated Production with the Company.

Integrity System: Is the Compliance program implemented at BRF, taking into account the parameters and guidelines contained in Law No. 12,846/13, Decree No. 8,420/15, CGU Ordinance 909/15, CVM Instruction No. 586/2017, and other foreign laws to which BRF is subject, as well as the specificities of the sector of performance, the risks to which company is subject, methodologies, and best market practices.

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

Market Conditions: Are the conditions for which the following principles and conditions were observed during the negotiation, which together aim to guarantee the arms' length of the transactions: (a) competitiveness (prices and conditions of services compatible with those found in the market); (b) compliance (adherence of the services provided to the contractual terms and responsibilities practiced by the Company, as well as adequate information security controls); (c) transparency (adequate reporting of the conditions agreed upon with their proper application, as well as their impact on the Company's financial statements); and (d) equity (establishment of mechanisms that prevent discrimination or privileges and practices that ensure non-use of inside information or business opportunities for the benefit of individuals or third parties).

Officers and Directors: 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 attorney), such as members of the Board of Directors and Audit and Advisory Committees.

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; and



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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.

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.

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.).

Related Parties: An individual or legal entity shall be a Related Party if they: (i) have full or shared control of BRF, (ii) have significant influence over BRF, or (iii) are a Key Person in BRF's Management. Close Family Members of individuals falling within this definition shall also be considered Related Parties.

Senior Management: Are specific Employees who make up the Company's strategic level to establish the policies, objectives, and general direction of its organization.

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 attorney), such as customers, suppliers, service providers, brokers, and business partners.



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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.