



# Transparency Report 2021

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#### **Introduction Optimization Optimization Optimization Set 1 S**

Welcome to the BRF Transparency Report 2021. You will find here the Company's achievements, innovations, and evolution in promoting its commitment to INTEGRITY. Along with Quality and Safety, Integrity is one of the three commitments that guide all of BRF's operations. We proudly publish yet another publication, reaffirming transparency and open dialogue.

Happy reading!



# Message from our Leadership

# Letter from the Audit & Integrity Committee

It is with great pride that the BRF's Audit & Integrity Committee (CAI) showcases the solidity of all its Integrity processes to the Company's stakeholders.

Today we can guarantee that this is a fundamental commitment of the Company and permeates the DNA of BRF's team, unconditionally supported by the Board of Directors and its committees. We have the utmost confidence that our control mechanisms, such as communications, ombudsmen, and benchmarking, are fully functional. This observation allows us to look at how much has been achieved in recent years.

It simultaneously launches new challenges for the future since this is a continuous process to build trust and improve Integrity management among all links in the production chain.

CAI acknowledges the recent achievements and is extremely confident that the entire BRF team will remain committed to developing these processes and bolstering the culture of integrity at the Company. The company is strongly motivated and supported to continue on its evolution journey.

#### AUGUSTO CRUZ Coordinator of the Audit & Integrity Committee



Augusto Cruz.

# Message from the Global CEO

Integrity is a non-negotiable commitment at BRF and, together with Safety and Quality, guides the Company in its purpose of supplying increasingly high-quality, tasty and practical food products to people around the world. It is a huge responsibility, which makes us proud and keeps us firm in the thousands of daily decisions we make in our business. Integrity is and always will be the basis of our choices.

We are present in over 117 countries, taking food to millions of people. To achieve this, we rely on the engagement of more than 100 thousand employees, approximately ten thousand integrated producers, suppliers and over 350 thousand customers who help us daily to gain the trust of millions of consumers who choose our brands, recognized in Brazil and abroad.

Managing this living chain and operating in countries with diverse cultures requires commitment from everyone. That is why we work tirelessly so that our employees, integrated producers, suppliers and customers share a culture of ethics and transparency and comply with the laws and regulations of the countries where we operate, with honest and sustainable behavior.

We follow international standards, we are guided by the Sustainable Development Goals (SDGs) of the United Nations (UN), and we are committed to standards and guidelines that aim to maintain ethical, transparent and honest relationships. In 2021, we evolved towards this direction by maturing our Compliance structure, which implies a vision for risks shared by all of the company's areas. We also made progress on agendas related to Environmental, Social and Governance (ESG) aspects, which represent achievements on a continuous improvement path.

We closed 2021 satisfied with our evolution in this challenging year and excited about moving forward on this beautiful journey. Therefore, we are daily renewing our commitment to Integrity with our stakeholders, strengthening lasting bonds, sustained by trust and transparency.



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US About BRF

BRF S.A. has 87 years of history and owns brands such as Sadia, Perdigão, Qualy and Banvit. We serve the markets in the Middle East, Asia, Europe and the Americas with lines of frozen foods, in natura proteins, margarines, cold cuts and lunch meat, as well as ingredients and animal feed. We are the largest poultry exporter in the world, besides being leaders in poultry and pork production in Brazil.

Our company is on the table of nine out of ten Brazilians, in the Halal and international market. To reach so many people with quality products, we never stop evolving in processes, technologies and practices to promote ethics and transparency.

Over the last year, we consolidated our Integrity System and matured our risk management



Aerial view of the Jataí - GO headquarters.

structures, engaging employees at all levels and business partners with our Integrity, Security and Quality commitments. To keep commitments on a global scale, we invested in the evolution of process digitalization and in the implementation of new solutions for risk analysis and transactional controls, reaching 45 controls in 2021.

We always work with the objective of promoting a culture of integrity based on shared responsibility by all those who belong to the business. For this reason, **we increased the numbers related to the ongoing training of our employees and business partners** on topics related to ethics and integrity, and developed other initiatives to share knowledge, such as Integrity Week (learn more on page 20). We also evolved in the **reputational analysis of our business partners,** including social, environmental and human rights topics in our risk analyses, besides having optimized our digital system with valuable partnerships.

In recognition for our excellence in the theme, we won the 47th edition of the ABERJE Award, the most important business communication award in the country in the categories "Company of the Year", "Ethics, Integrity and Compliance" and "Crisis Management". Besides the ABERJE award, our Compliance Director, Reynaldo Goto, was chosen as one of the most admired compliance executives by the yearbook "Analysis of Legal and Financial Executives".

# our Essence

#### BELIEF

A better future for everyone depends on an increasing supply of high-quality food.

#### PURPOSE

# **Better Life**

Supplying increasingly high-quality, tasty and pratical food products to people the world.

We achieve this by sustainably managing a dynamic, extensive and complex value chain that helps to make life better for everyone, from farm to dinner table.

## COMMITMENTS

Safety

Quality

Integrity

# People

Evolution through knowledge
Diversity creates wealth
Open and respectful communication

### PRINCIPLES

## Interdependence

- Different parts form the whole
   Production and demand
  - Short and long-term

PASSION A passion for food.

## Results

Excellence always
Efficiency and innovation
Above-the-line, sustainable mindsets

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# Compliance

BRF's corporate governance practices and functions are directly mobilized for the matters of integrity, ethics and transparency.

Our principal governance bodies are the General Shareholders' Meeting, the Board of Directors, the Board's Advisory Committees, the Fiscal Council and the Executive Board. We rely on our leaders as the prime examples of commitment to ethical conduct.

The Compliance Department, which reports to the Legal, Compliance, Governance and M&A Vice-Presidency, has decision-making autonomy and independent reporting to the Transparency and Audit and Integrity Committees, as well as to the Executive Committee and Board of Directors.

Its main responsibility is to coordinate BRF's Integrity System, applicable to all employees, from senior management to employees at the plants, including those who are part of this dynamic, extensive, and complex chain.

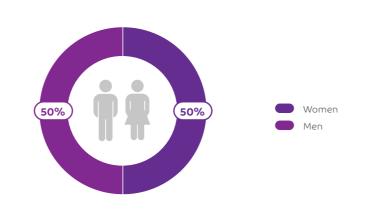
is gender-balanced

**DIVERSITY CREATES WEALTH** 

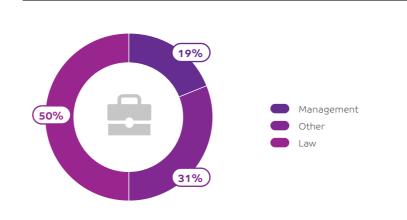
Our compliance team is composed of

professionals from various areas and





#### Qualification area



19%

Less than 5 years

Between 5 and 20 years

Over 20 years

## Appropriate skills in continuous learning

At the end of 2020, BRF underwent an ISO 37001 audit, confirming that our Integrity System has very robust human, financial and technological resources related to anti-bribery practices. BRF's Certification was renewed at the end of 2021, effective until January 2024.

As part of the hiring process, all Compliance professionals are carefully evaluated and undergo integration training with a minimum workload of 12 hours. In addition, in 2021, our professionals spent about 700 hours in internal training and 1,800 hours in engagement activities and external training.

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71%

#### Employees on the compliance team



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# Transformative Leadership

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BRF's senior management is directly involved in promoting a culture of ethics and transparency, critical to the development and effectiveness of our compliance policies and practices.

The Vice-President of Legal, Compliance, Governance and M&A and the Compliance Department participate in the meetings of the Board of Directors (BD), the Audit and Integrity Committee (CAI) and the Executive Committee (COMEX) to present the Integrity Program's evolution, report on the status of investigations and other matters related to the Transparency Manual and the Company's compliance policies.

We also have the Transparency Committee, which is coordinated by the Compliance Department and composed of Company Executive Board members. The committee is responsible for overseeing BRF's Integrity System and advises on the management of compliance issues, in addition to defining conduct standards and applying corrective and/or disciplinary measures.



Poultry operation line, in Rio Verde - GO.



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# Integrity in Action

Connection between BRF pillars and external references:

PILLAR			REFERENCES		
		DESCRIPTION		DOJ	ISO 37001
Ø	Compliance risk detection and mitigation	Mapping risk factors involves the Company's policy related to the area, and the methodology used to create the map. This process enables not only the ascertainment of factors, classified based on probability and impact, but also the subsequent identification of mitigating factors, materializing action plans created and monitored by BRF.	Item 3	ltem I. A; II A	Item 4.5
3	A global structure suited for the level of risk	In order to embrace the markets served by the Company, its Compliance practice has a global reach, tasked with setting policies and guidelines for operations in Brazil and elsewhere. This work is reported to the vice presidency of Legal, Compliance, Governance and M&A, in addition to independent reports to the Transparency Committee and Audit and Integrity Committee.	Item 2	Item II	ltems 4.1; 4.2; 4.3; 4,4; 5.1; 5.1.1; 5.1. 5.3; 5.3.2; 5.3.1; 5.3.3; 6; 6.1; 6.2; 7 7.2; 7.2.1; 9.3; 9.3. 9.3.2; 9.4; 10
	Global policies and procedures	To address key issues and critical business matters, BRF has more than 25 Compliance policies, all disclosed through our intranet to Company employees - a number of which are available for the general public.	ltem 4.2	Items I.B; III.A	ltems 5.2; 7.5; 7.5. 7.5.2; 7.5.3; 8.7
	Training, capacity building and Communications	The Company provides ongoing training and capacity building about BRF's Integrity System and management policies to employees and business partners. More than 70 weekly publications were made in 2021 about Integrity policies and standards through online and printed bulletins, distributed to offices, factories and distribution centers.	ltem 4.3	Items I-C; II.A	ltems 7.3; 7.4; 10.
5	Business partner due diligence	Before entering into certain contracts, the Compliance department conducts a due diligence, a process that includes automated searches of media reports, legal proceedings and official blacklists. This helps to identify potential corruption, bribery and other fraud issues that could create exposure for BRF.	ltem 4.2	Items I.E; I.F	ltems 8.2; 7.2.2; 8 8.6; 8.8; 9.1
<b>*</b> 1	Digital controls and agile monitoring that is responsive to business dynamics	BRF's operations are continually monitored for compliance with applicable laws, policies and internal guidelines through internal controls assessments, audits and transactional tests, in collaboration with other departments and the external audit. Appropriate controls are in place that are monitored by the Compliance department, are consistent in design with the level of risk of each transaction and are implemented efficiently with minimal negative impact on transactions.	ltem 5	ltem III	ltems 8.1; 8.3; 8.4; 9.1; 8.7; 10.2
7	Misconduct detection and remediation	Our 24/7 Transparency Channel is available to all employees, business partners and external stakeholders, and is used for whistleblowing. The Channel is managed by a third-party, independent firm, thereby ensuring that reports are kept anonymous and confidential. By way of its corporate compliance policies, BRF guarantees there will be no reprisals to whistleblowing made in good faith and it will protect the image of all those potentially involved.	ltems 4.4, 4.5 e 4.6	Items I.B; II.C; III.B; III.C; I.D; II.C	ltems 8.9; 8.10; 9. 10.1
	External engagement and sharing best practices	In addition to its internal activities, the Compliance department works continually to collaborate with key initiatives against corruption in Brazil. We have actively participated in initiatives such as the UN Global o Compact, the International Chamber of Commerce (ICC), Legal, Ethics & Compliance (LEC) and the Pact for Sports, as well as a wide range of forums organized by non-government organizations and private companies across range of sectors, where we have shared best practices in combating public and private corruption.	Item 5	ltem III.A	ltems 9; 10; 10.2
Refere docun		<b>CGU</b> : Controller General of the Union, <u>click here</u> the Integrity Program (guidelines for private companies); <b>DOJ</b> : U.S. Department of Justice, <u>click here</u> the document to evaluate compliance programs; ISO 37001: <u>click here</u> to see guidelines for applying the standard.			



### **Integrity Ambassadors**

Promoting a culture of integrity is a task for all our employees. Even so, to ensure engagement and dissemination of the theme, we have the Integrity Ambassadors program, a network of 293 ambassadors in Brazil and 36 in the foreign market, covering the most diverse areas of the company.

Our ambassadors voluntarily disseminate standards, procedures, and encourage the use of BRF's Transparency Channel. Their responsibilities include supporting the implementation and improvement of the Integrity System, encouraging ethics and transparency, and promoting the Integrity Commitment among employees.

All program applicants undergo Integrity training and participate in monthly multidisciplinary meetings to answer questions, discuss sensitive topics and share knowledge about best practices. Our training sessions are accessible to the hearing impaired.

#### 270 ambassadors appointed/ trained in 2021, **totaling a network of 329 ambassadors**

52% women

48% men

Presence in the **eight vice-presidencies** and in **100% of BRF Brazil** 

- 77% operational administrative
  23% managers
- 12 hours of training on Integrity topics

#### World Presence

Brazil, China, Turkey, Oman, Qatar, UAE, Kuwait, Singapore, Japan, Europe, South Africa



## Ambassadors' nationalities present in Brazil:

- Brazilian;
- Haitian;
- Venezuelan;
- Togolese.

# Integrity is a fundamental principle that guides all our work.

In October 2021, we held an Ambassadors and Ambassadresses workshop with the presence of two Vice Presidents to talk about the relevance of integrity in all of BRF's actions. At the same event, which was attended by over 200 people, an **award ceremony** was held to recognize the most active ambassadors of the program.

During **Integrity Week**, held in March 2021, the ambassadors mobilized the units to participate in various dynamics on the themes of ethics, transparency and integrity. The Week was a virtual and face-to-face success, with webinars, surveys, activities developed for mobile apps, online quiz challenges, and other actions.

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Another year highlight was the development of new **Integrity Recipes**, an initiative to communicate integrity policies in a playful manner. The action engaged our employees to talk about integrity on a daily basis. The Integrity Recipes were the theme of goal-checking meetings, shift changes and other moments of the company's daily routine.

# Integrity System

The Integrity System establishes BRF's integrity guidelines and was implemented considering the specificities of the agricultural production sector and the risks to which the Company is exposed.



## 2020 CEMENT FOUNDATIONS

Reducing risk exposure;

- International structure;
- Implementing transactional controls;
- Assessing system maturity;
- Budgetary responsibility.

## 2021 – 2023 GROWTH AND OPTIMIZATIONS

> Reducing risk exposure;

- > Clearing the backlog investigations;
- > Engaging stakeholders;
- > Maturity of the international organization;
- > Budgetary responsibility.

# CONTINUOUS

Every three months, an independent external audit is hired to assess the Integrity System, based on the criteria of the Sarbanes-Oxley Act (SOx). BRF also conducts internal assessments of the eight pillars of the Integrity System (learn more on page 12).

Key performance indicators include the volume of people trained and informed about compliance issues; number of background checks on business partners and commercial transactions; and answers to contacts made via our Transparency Channel. The data is monitored weekly by the compliance team and reported in the meetings of the Audit and Integrity Committee.



Poultry farm in Marau - RS

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## Compliance Risk Detection and Mitigation

In our journey to strengthen the structures dedicated to integrity and promote an ethical and transparent culture in the Company, we increasingly seek the commitment of all our employees to mitigate potential risks that challenge our operations. This commitment begins at BRF's senior management, whose responsibilities include identifying and mitigating compliance risks.

Due to changes in laws and regulations, new scenarios, internal changes and the entry into new markets, risk mapping should be periodic. Likewise, the review of the pillars that make up the Integrity System should occur periodically, considering the risks identified and the exposure level to these risks.

Risk mapping is guided by the Company's policies and by the methodology that conducts the map development. This process allows for the identification of factors that are likely to impact the Company's operations and the development of action plans to reduce or neutralize these impacts. The Risk Management Policy, which establishes the guidelines for the topic, published in 2020, represented a breakthrough in the proactivity of the Company's areas in the face of compliance risks. It is important to add that the risk matrix is not limited to compliance issues: there are more than 60 risk categories, updated annually.

As the performance of the risk area is cross-cutting, we can find risk-related activities in several of the Company's programs, such as the Operational Excellence System (SEO) and the Mais Excelência, focused on excellence and management. In both, risk management is linked to the pillars, with clear monitoring indicators that help us update our risk map.

The Company has a variety of risk mitigation resources, which include periodic assessments carried out by independent, internal and external audits, involving BRF's governance bodies.



A total of 29 policies guide our Compliance area, learn more: https://www.brf-global.com/en/ about/ethics-and-transparency/ how-we-operate/



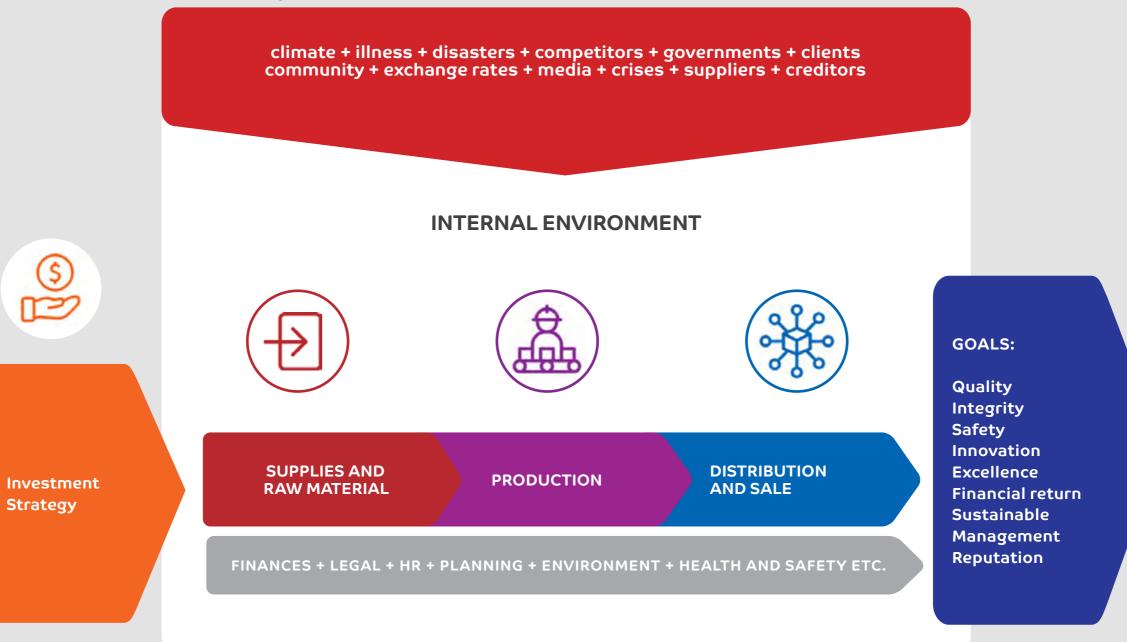
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BRF Alimentos, Toledo unit.

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### **BUSINESS ENVIRONMENT**

#### Uncertainty



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# A Global Structure Suited To The Level Of Risk

When we work to bring quality food to various parts of the world, we face considerable risks. To face these risks, we have developed and matured a risk management structure that is up to the existing challenge, operating in Brazil and in other countries where we are present. All of the company's employees, without exception, constitute our first line of defense, acting to mitigate risks, while the second line is maintained by the compliance structure linked to the theme.

The Risks and Internal Controls area, a partner of the Compliance Department, has among its responsibilities the dissemination of our integrity

Learn more about BRF's organizational structure:

culture. To achieve these objectives, the Integrity System is periodically evaluated by an internal audit, with a team composed of auditors specialized in ISO 37001, in addition to an independent external audit carried out annually.

The Compliance Department has free access to and participates in meetings of the Board of Directors and the Fiscal Council, whenever necessary. The Audit and Integrity Committee, in turn, reports to senior management the results of audits, information on risk management, actions to promote ethics and transparency, and the detailed analysis of relevant occurrences recorded by the Transparency Channel.

The Committee has five members, two of whom are external, which ensures more autonomy in decision making.

#### Members of the Audit and Integrity Committee 04/2020 to 03/2022\*

- Augusto Marques da Cruz Filho, Member of the Board of Directors and Coordinator of the Audit and Integrity Committee
- Ivandré Montiel da Silva, Member of the Board of Directors
- Marcelo Feriozzi Bacci, Member of the Board of Directors
- > Valmir Pedro Rossi, Independent external member
- Jerônimo Antunes, Independent external member

\* Appointment of the Committee members at the Extraordinary Board of Directors Meeting of 04/30/2020, with a term until 03/28/2022.





### **Risk Awareness**

The Global Risk Department is tasked with promoting Risk Management and Internal Controls (GRC) at BRF. A three-year Master Plan - the last one was developed and approved in 2019 - guides the work of the Board, which periodically analyzes, assesses, and classifies the Company's risks.

To ensure business continuity, and BRF's presence in the global market, the work of the risk area and its associated areas is preventive, with a long-term vision and ensures compliance with national and international laws and regulations.

Furthermore, in 2021 we implemented the digital tool for Risk Management and Internal Controls (GRC) (learn more on page 22), and updated the Company's Risk Map, based on the Master Plan. We also linked the Map and the company's social, environmental, and governance commitments to investments. Thus, we guarantee investments aligned with the main risk themes for BRF: the risks presented by the pandemic and all the risk categories that impact lives, in addition to the integrity risks to which we are constantly dedicated.

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## Global Policies and Procedures

We have more than 29 compliance policies, four of which are new policies published in the last year that address critical business issues. All policies and procedures are disclosed to our employees on the Company's intranet, and policies dealing with public commitments can also be found on our website.

In 2021, we met the goal previously established of reviewing and updating BRF's compliance policies and procedures. In addition, we worked on the regulation of new topics, such as Export Control, which allows us to map possible risks involved in international transactions more carefully, and Human Rights, bringing together good practices in social, humanitarian, and environmental aspects, directed to all stakeholders with whom we relate: employees, business partners, suppliers, and integrated producers. This initiative is part of a number of actions taken by BRF in 2021 in search of an increasingly sustainable operation.

Just as important as establishing robust compliance policies and guidelines is the communication of these guidelines to our employees and partners. To this end, we carried out several communication and training actions, with a highlight in 2021 for Integrity Week (learn more on page 20).

#### **Transparency Manual**

January 2021 saw the launch of the new Transparency Manual, the Company's code of conduct, with updated guidelines to inform employees, business partners, suppliers, service providers, customers and all our other stakeholders. The document focuses on topics such as behavior, human rights, ethics, fighting corruption and bribery, among other issues relevant to the promotion of an integrity culture.

The Transparency Manual is brought to the attention of everyone when they start their relationship with BRF, and, in 2021, we further innovated by implementing the online acceptance of the Manual, which is available in nine languages (Portuguese, English, Spanish, Arabic, Turkish, Creole, German, Chinese, and French) and applies to all levels of management and Company units.

The online acceptance term for the new Transparency Manual covers 100% of our employees, including those who are not computer users, which make up 60% of the Company's workers, and who can accept it through the totems made available at the units.



POLICIES revised or

of





Learn more: https://www.brf-global.com/en/ about/

## Training, Capacity Communications

We provide ongoing training for employees and business partners on BRF's Integrity System and management policies. All meetings, in the Company's various operations, are opened with one of our three commitments (Integrity, Safety, and Quality).

The result of the care taken in developing employees and communicating good practices was felt in 2021 due to the organic engagement expressed by the teams on several occasions. Integrity Week was one of these moments, and in our internal social network, Yammer, we could also see the commitment of the people who build BRF.

One of the challenges projected by BRF for 2022 is the continuation of the ISO 37001 certificate. We are the first animal protein company in Brazil with this certification and we are focused on training our employees and partners to always strive for maximum excellence, ethics and transparency so that our operations are based on the best market practices.

### BRF Training and Capacity Building

#### Transparency Manual Training

All employees joining BRF undergo training on the Transparency Manual, which is the Company's code of conduct (learn more on page 18). The attendance monitoring of this training is weekly, and we maintain a digital database to track the process.

#### **BRF** Academy

The academy's training sessions are aimed at employees with access to computers in the workplace. They consist of a track of courses on ethical integrity and transparency and a specific session with practices and regulations for each area. All employees must complete the training within 30 days of joining the company.

The courses on the theme of Integrity are: Donations and Sponsorships, Anti-bribery and Anti-corruption, Conflict of Interest, Giveaways, Gifts and Hospitalities, Compliance Aspects in LGPD, Business Partners Code and Relationship with Public Power. The BRF Academy courses are totally online, available in several languages and accessible using libras (Brazilian Sign Language), special computers, and subtitled in Portuguese.

#### **Risk Based**

The training addresses the basic compliance risks in each area. The sessions, which were face-to-face before the pandemic, began to take place through the Teams web tool during the distance period. About 6,000 employees in decisionmaking positions took the training in 2021.



- 14 thousand total hours dof training at the BRF Academy
- 100% of senior leadership trained in integrity subjects
- 100% of employees trained in the New Transparency Manual and in anticorruption and anti-bribery topics
- six thousand employees trained in Risk Based themes.



### Communication

#### Integrity is our commitment. Right is right even when no one is looking.

Since 2019, this is the motto of a campaign conducted at all BRF business units in all countries where we operate, to strengthen our employees' and partners' commitment to integrity. Texts with thought-provoking situations are spread throughout the units, in addition to other strategies designed specifically for each audience. The Transparency Manual, Policies, Procedures, Standards, and the Reporting Channel, among other topics, are dealt with in this communication.

Among the strategies are webinars, campaigns such as Integrity Week, e-mails and self-service totems in the units. The content is broadcast in Arabic, Spanish, English, Portuguese, Turkish, and on demand for the main markets.

Besides the internal audience, there are also channels for communication with suppliers, such as the supplier portal, social networks, LinkedIn and events in which we share best practices. Similarly, integrated producers, an audience with a very close relationship with the Company, are engaged through communication in the BRF Rural Journal, the supplier portal and at events, channels through which we always address integrity topics.

Investors are reached through reports, LinkedIn, and compliance events, and we communicate with society through the press, reports, social networks, compliance events, and collective actions.

### Highlights

The **BRF Rural Newspape**r is distributed in print to BRF's partner farmers. The publication addresses, among other subjects, the topics of ethics and transparency, in a straightforward manner so that everyone is aligned with the Company's culture.

During Integrity Week we held a number of **webinars** that were transformed into **podcasts**. Among the topics covered were: Integrity and Social Investment and World Consumer Rights Day. The webinars were given by several guests, including Clóvis de Barros, Marcelo Tas and Leandro Karnal. In addition to these programs, we created scripts for podcasts, broadcasted in the local internal radios of BRF's units.

The exchange of ideas and the productions made through our internal social network, Yammer, make us very proud. The network includes videos and the dissemination of texts and campaigns, in addition to actions spontaneously created by our employees, such as a gymkhana with the integrity theme and the videos from the parody contest on the same theme. In the period, there were also initiatives in other channels, such as TikTok, which demonstrate the organic commitment of the Company's employees to promoting a culture of integrity.

We also communicate with our employees through **BRF News**, a bulletin board posted on bulletin boards at the production units. Due to the complexity of our operations and the very diversified activities developed by our people, BRF News is one of the initiatives to maintain a unique dialogue with everyone!

## Business Partner Due Diligence

Our Compliance Department conducts reputational analysis of business partners before contracts are signed, with the aim of ensuring integrity in all of the Company's relationships. The analysis includes automated news checks, legal and administrative proceedings, restrictive lists, and checks on the history of harmful acts against the public administration by individuals and companies.

It is desirable that, in the case of legal entities, the partner has an integrity program to mitigate the risk of irregularities and be in accordance with our ethical principles. By adding these precautions to our digital controls, we can map the potential risks to which the company is exposed in its relationships with business partners and avoid corruption and fraud cases. Potential mergers and acquisitions are also carefully analyzed, going through due diligence processes to check for risks of corruption and fraud.

In 2021, we revamped our Business Partner Code of Conduct. The objective was to broaden the approach to ESG issues, a theme addressed both in the document and in the publicly disclosed Human Rights and Sustainable Grain Purchasing Policies. We are working on a reputational analysis of our suppliers, paying attention to socio-environmental and human rights risks, with the support of the Grain Sustainability Committee, a multidisciplinary body within the company. We also worked on mapping integrated producers who may have been politically exposed in the 2018 elections, which included training offered to the BRF management level and based on our Integrity System.

We also engaged our partners through a video on the Transparency Manual, published on the platforms for these audiences. All those who intend to establish business relations with the company are introduced to our guidelines and are made aware of our Manual, in addition to registering their acceptance of our principles. In doing so, we take care of our partnerships to maintain and ensure integrity and sustainability throughout our business chain.

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#### Due diligence demands



In 2021 more than **6.5 thousand due diligences** were performed on Business Partners, with the renewal of more than **500 due diligences** referring to high-risk contracts for the Company.



## Digital Controls and Agile Monitoring

BRF's operations are continually monitored for compliance with applicable laws, policies and internal guidelines through internal controls assessments, audits and transactional tests, in collaboration with other departments and the external audit. We count on specific digital controls designed according to the risk level of each operation, working systematically and automatically, and implemented quickly and with minimal impact on operations. Also, among the year' highlights in the digitalization of processes is the development of the digital acceptance term for the new Transparency Manual (learn more on page 18), and the Integrated Center's (ITC) look at risks. The area has a digital operation with the objective of anticipating the business, bringing in its system a risk management component, with a preventive focus. One example is the Channel tool, an IBM satellite system that monitors the climatic conditions and has the possibility to anticipate problems in the grain harvest.

More automation processes are underway for 2022, such as receiving and managing due diligence demands from business partners. Besides this, the self-declaration of conflicts of interest process, which involves the HR area, will also be a focus of innovation next year. We are working to make the process automatic, combining efficiency and speed.

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#### **Efficiency and Innovation**

In 2020, we projected the implementation of new solutions for risk analysis and transactional controls, and since then, our progress in the area has been significant. With 14 active controls in 2019, we increased to 34 the following year, and by 2021 we reached 45 active controls, such as:



#### Data Loss Prevention (DLP),

a control that issues alerts related to improper message exchange and performs document confidentiality classification;



**Special Discount Control in Stores,** which helped to increase maturity in the process of granting discounts in the Company's stores exclusive to employees. A total of R\$ 116,705 in undue discounts was avoided;



# **Small Purchase Control,** a tool for a previously

manual process that is now completely automated. The control implies a greater conformity of our relationships with suppliers;

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#### Employees' Travel Expenses

**Control**, which went from monthly to weekly and automated. In addition to efficiency, we gained transparency in business travel expenses;



#### Apprentice working hours

**control**, a tool to verify compliance with the working hours of apprentices as defined by the Consolidation of Labor Laws (CLT).

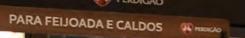


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### **Digital Controls**



#### Small Purchases 23 thousand requests analyzed, equivalent to

R\$ 27 million in monitored transactions 287 alerts to orders, equivalent to R\$ 477 thousand

DLP

> 115,247 analysis Λ P

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## **BRF** stores

217 alerts, equivalent to > R\$116,705 in blocked transactions

**Apprentice Journey** > 1,138 alerts



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The Company expects to avoid the loss of about R\$ 12.5 million in fraud over the next two years, using **Big Data and Analytics technology** created by the Votorantim Center of Excellence (CoE)

In partnership with the Votorantim Center of Excellence, we implemented SyKn, Software as a Service (SaaS). The tool combines intelligence, speed and analytical capacity to evaluate more than 2 thousand suppliers, considering eight scenarios and issuing an average of 22 thousand alerts monthly.

The investment is part of a R\$700 million package that will be directed to digital transformation initiatives in the company until 2025.

SyKn is an initiative that contributes to increasing assertiveness and speed in making decisions that involve a high degree of risk for BRF.



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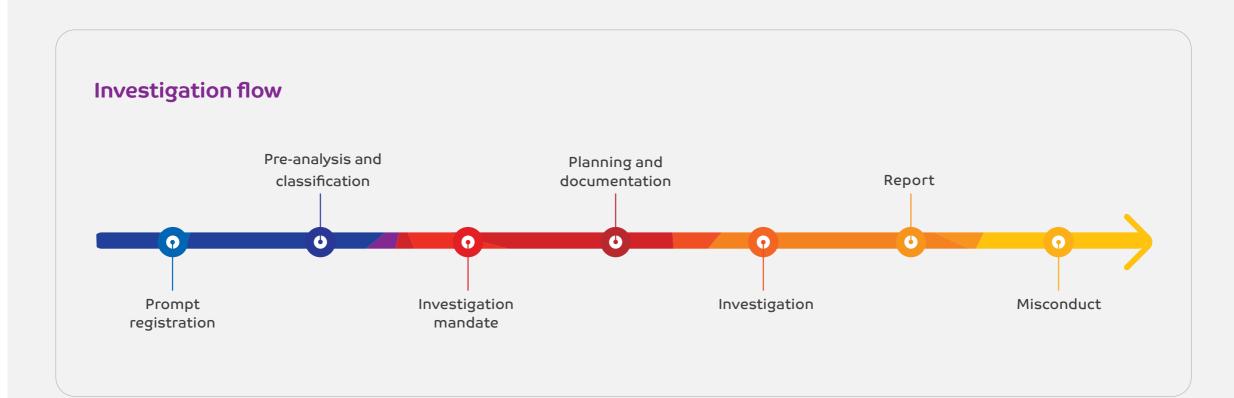
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# Misconduct Detection and Remediation

Our Transparency Channel is available to receive reports, records of suspicions and alerts. The channel is managed by an independent company that offers anonymity and confidentiality to the reports submitted. The channel's impartiality is also guaranteed by BRF's corporate compliance policies of non-retaliation to the good-faith whistleblower and image protection for all potential involved parties.

Once registered, the reports are forwarded to our internal investigation team, which verifies the facts and supports the areas in the application of corrective or disciplinary measure. The **Transparency Channel** receives reports 24 hours a day, through several communication channels, including a website, online forms and telephone lines in operation in Brazil, Austria, Turkey, Oman, Qatar, UAE, Saudi Arabia, Kuwait, Japan, China and Singapore.





### **REPORTING CHANNEL**

#### **REPORTS REGISTERED**

2019	2020	2021			
1,657	2,652	3,156			
BEHAVIORAL TOPICS					

2019	2020	2021
1,169	1,987	2,471

	2019	2020	2021
Fraud involving customers	70	84	93
Discrimination	35	46	55
Theft or embezzlement	66	60	63
Fraud involving suppliers	119	100	113
Harassment	125	354	465
Other	1,242	2,008	2,367

**REGISTERED FRAUDS / DIVISION BY SUBJECT** 

	2019	2020	2021
Cases under investigation	526	1,196	2,009
Cases Closed	1,526	2,073	2,345
Substantiated	573	589	728
Unsubstantiated	953	1,484	1,617
Penalties	172	252	317
Warning	86	121	198
Resignation	82	116	111
Suspension	4	15	8

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#### **Transparency Committee**

Consisting of members of Company's senior management, the Transparency Committee is responsible for overseeing BRF's Integrity System, providing advice on serious Compliance risks and resolving the application of remediation measures and/or disciplinary sanctions in response to alleged violations of internal policy and the Transparency Manual.

All reports received by the Transparency Channel are carefully analyzed and duly handled. The area conducts a preliminary analysis and if there is sufficient information, the investigation is initiated. The case may be sent for analysis by an external consulting firm, at the request of the investigating area.

Substantiated reports are handled by a multidisciplinary committee that deliberates on the appropriate disciplinary measures with the support of the areas involved.

Once the investigation is concluded, the reports are communicated to the whistleblowers, if it is possible to contact them. Due to the confidentiality of the investigation, the results remain confidential.

### **Information Security**

Due to the sensitivity of the information we deal with every day, a robust information security structure is imperative. Data Loss Prevention (DLP) is our information classification tool, which covers 100% of computerized employees.

At the time of creation of any file, the tool allows the classification of the document as public, external, confidential, or strictly confidential, and tracks the path of this document, ensuring its correct destination. The tool also issues an alert if improper message exchanges occur.

DLP is already in place, and for the coming year we will focus on actions to improve the standards relating to information security, training, and the creation of an information leakage risk map.



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## External Engagement and Sharing Practices

To stay up-to-date on best market practices and share experiences in promoting an environment of ethics, transparency and integrity in business, our Compliance Department actively participates in forums and associations focused on integrity. Among them are the International Chamber of Commerce (ICC - Brazil), Compliance Woman Committee, and Legal, Ethics & Compliance (LEC), Instituto Não Aceito Corrupção, Observatório Social do Brasil, Ministério da Agricultura e Pecuária (MAPA), FGV Ethics, UN Global Compact - Brazil Network, Pact for Sports,

BRF is committed to the most relevant integrity-related commitments of the present day. In an increasingly global, complex and ever-changing environment, this engagement is essential to maintain the values and an organizational culture of integrity and transparency.

PROF.ª LÍGIA MAURA COSTA, FGV EAESP CONVING DE ESTIDIOS DI GUICA, TRAÁSTRAÁDICIA. SUTTORIOLASE COMPLIANCE. Associação Brasileira de Proteína Animal (ABPA), Integrity Task Force, B20 Compliance and OECD Working Groups.

Going further, between 2020 and 2021, we shared best integrity practices with companies and institutions from the most diverse segments, such as Embraer, Bunge, KPMG, Cia Hering, Governo do Estado do Rio de Janeiro, Aberje, Instituto Inhotim, Votorantim, Suzano, INPI, and more than 26 other entities.

At BRF, we understand that when it comes to respect for ethics and integrity, all market players need to cooperate to establish a social pact of ethics and transparency, always maintaining the highest standards of excellence in their attitudes. Below are some considerations from professionals and scholars in the areas of integrity and compliance on our management of the topic:

### Aberje award



In 2021, BRF was awarded in the categories "Ethics, Integrity and Compliance" with the case Commitment to Integrity Inside and Outside BRF; and "Crisis Management", in addition to the Company of the Year award.

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BRF invests in compliance and puts integrity into practice in its daily routine, which is sensational.
 I can clearly see the leading role played by the BRF Compliance
 Team, which is always present with pacts, commitments, and initiatives in the compliance field.



BRF's compliance management is very open to discussions and to dealing with issues that are sensitive to the organization and to the agribusiness sector as a whole, participating in several initiatives that encourage corporate responsibility for environmental, social, economic, and governance issues.

PROF.ª AGATHA EUGENIO FRANCO DE CAMARGO PARAVENTI,



As a listed company, BRF meets all the market's governance and compliance requirements, going beyond, through its area of this segment, with permanent performance and always aiming towards the forefront.



# Acknowledgments

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