



BRF S.A.
Publicly-held Company with Authorized Capital
CNPJ 01.838.723/0001-27
NIRE 42.300.034.240
CVM 1629-2

Conflict of Interests Corporate Policy

English Version

1. OBJECTIVE

Establish guidelines on situations of Conflict of Interest, in addition to the definitions contained in the BRF Transparency Manual, to be adopted by BRF S.A. ("BRF" or "Company") Employees and other professionals acting on behalf of or for the benefit of the Company.

Terms in uppercase and their variations within this Policy shall carry the meanings ascribed to them in the Glossary.

2. CONFIDENTIALITY STATUS

This is a Public Policy.

3. APPLICABILITY

This Policy applies to all BRF Employees and any Business Partner, whether located in Brazil or abroad. All Business Partners must ensure that their actions on behalf of BRF adhere to the same integrity standards expected of BRF Employees.

4. ROLES AND RESPONSIBILITIES

4.1 COMPLIANCE BOARD

The Compliance Board is responsible for (i) guiding the correct handling of Conflict of Interest situations, (ii) responding to queries on the subject, (iii) establishing the necessary procedures and instructions for the implementation of this Policy, (iv) communicating and training Employees on the rules set out in this Policy; (v) monitoring compliance with this Policy; (vi) keep records of self-declared situations; and (vii) taking any omitted cases or exceptions to this Policy to the BRF Transparency Committee for deliberation.



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4.2 BRF EMPLOYEES

BRF Employees must act ethically, impartially, and objectively in the Company's best interests and declare any Conflicts of Interest in which they are involved to the Manager, the Human Resources Board, and the Compliance Board.

4.3 HUMAN RESOURCES BOARD

It is the responsibility of the Human Resources Board to (i) advise Employees on the declaration of identified Conflict of Interest situations; (ii) define, under guidelines from the Compliance Board, the correct treatment for reported conflict situations; and (iii) apply the appropriate disciplinary measures in cases of non-compliance with this Policy, in conjunction with the Manager.

4.4 BRF MANAGERS

Handling, monitoring, and ensuring the declaration of Conflict-of-Interest situations identified in their respective areas to the Compliance Board and the Human Resources Board.

4.5 CORPORATE REPUTATION BOARD

In cases where BRF information is disclosed or shared in academic papers, events, seminars, and lectures, the Corporate Reputation Board is responsible for authorizing participation and the material used.

4.6 TRANSPARENCY COMMITTEE

The Transparency Committee is responsible for (i) monitoring compliance with this Policy and (ii) deciding on transactions involving situations of Conflict of Interest under its Internal Regulations.



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5. GUIDELINES

5.1 CONCEPT AND GENERAL ASSUMPTIONS ABOUT CONFLICTS OF INTEREST

Conflict of Interest can be defined as the interference of personal interests, directly or indirectly, in such a way as to influence your decision-making, judgment, or performance of your professional duties, resulting in inappropriate decision-making to the detriment of the Company's interests.

Employees must act impartially and objectively, consistently prioritizing the best interests of BRF and refraining from allowing their interests, or those of close family members, business partners, or any third parties, to take precedence to the detriment of BRF's interests.

If the Employee perceives a possible Conflict of Interest, they must remove themselves from the situation and/or refrain from participating in the decision-making process, informing their Manager, the Compliance Board, or the Human Resources Board.

Conflicts of Interest can manifest as actual, potential, or apparent situations:

- **Actual:** a situation in which there is, in fact, a clear Conflict of Interest. Example: The employee in charge of hiring a Business Partner hires him without observing the proper selection process, a company controlled by himself.
- **Potential:** a situation that has not yet developed into an actual conflict, but there is a possibility that there will be some change in the situation and a conflict will arise. Example: hiring a Business Partner whose partner, manager, or owner is a Close Family Member of an Employee through the appropriate selection process.
- **Apparent:** a situation where a person could deduce that a Conflict of Interest exists, even if it does not exist. The situation may cause others to perceive it as a lack of impartiality or that the Company's interests have not been respected. Example: Employee has a Close Family Member with no decision-making power, working for a Business Partner, without interacting with BRF on a day-to-day basis.

5.2 APPROVAL OF BUSINESS TRANSACTIONS WITH A CONFLICT OF INTEREST

Business transactions in Conflict of Interest situations can be carried out and approved provided that: (i) all the requirements of the internal contracting policies and other related policies established by the Company are complied with; (ii) they are carried out under



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market conditions; and (iii) the person who is in a situation of Conflict of Interest ceases to participate in the decision-making process or the management of the contract.

5.3 APPROVAL OF RELATED-PARTY TRANSACTIONS

Transactions involving BRF and its Related Parties shall comply with the provisions contained in the document 28.1.006 - *Política Corporativa de Transações com Partes Relacionadas* / Related Party Transactions Corporate Policy to ensure that the Company's decisions are taken in the best interests of BRF and its shareholders while also guaranteeing transparency to shareholders, investors, and the market in general and equal treatment with Business Partners, under the best corporate governance practices.

5.4 TRADE UNION RELATIONS

The rules regarding Trade Union Relations and Employees who work for Trade Unions or similar entities are described in the document 06.9.003 - *Diretriz para Negociações Coletivas com Entidades Sindicais* (Guidelines for Collective Bargaining with Trade Unions).

5.5 DECLARATION PROCEDURE

5.5.1 BRF Employees

When faced with a Conflict-of-Interest situation, the Employee must (i) inform the immediate manager, the Compliance Board, and the Human Resources Board of the Conflict of Interest by filling in the Conflict of Interest declaration made available on the Company's system. Employees still must update their declaration whenever necessary.

Furthermore, employees **ARE PROHIBITED FROM:**

- Allow Close Family Members (regardless of the degree of kinship) or people with close relationships to work under their direct subordination or even interfere in the recruitment and selection or promotion processes conducted by the Human Resources Board. In this case, Affectionate Relationships between people in the same area, in which one person has a hierarchically superior position to the other, are also forbidden;
- Participating in or influencing (directly or indirectly) the hiring of Business Partners and/or the management of the contract if this Employee has links of any kind with said Business Partners;



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- Providing, on their account or through Close Family Members, services to Business Partners who maintain relations with BRF;
- Assume, directly or indirectly, the position of partner, administrator, or owner of Business Partner companies that maintain a relationship with BRF and/or be a BRF Business Partner as an individual;
- Provide services to third parties during working hours or by using BRF facilities, material, communication means, or equipment in such a way as to interfere in their activities and/or decisions pertinent to BRF, in disagreement with the assessment of their Manager;
- Passing on non-public information about BRF or its direct and indirect competitors;
- Undertake, whether directly or indirectly, roles such as partner, administrator, creditor, investor, trustee, consultant, or any other position with a direct or indirect competitor of BRF, especially if such a role grants the employee the authority to influence the competitor's activities, either periodically or consistently. Diverting to themselves or to Business Partners commercial opportunities of which they are aware by their position;
- Sharing of strategic Company information by an Employee who has Close Family Members or a person with whom he/she has an Affectionate Relationship working for a direct or indirect competitor of BRF.

The list provided is illustrative; therefore, employees are required to **report any instances of Conflict of Interest**.

5.5.2 BRF's Business Partners

Business Partners must declare any Conflicts of Interest that may occur before the contracting process is concluded or that may occur during the term of the relationship with the Company.

In addition, every Employee must report any situations of Conflict of Interest involving Business Partners they are aware of and may not have been reported by the Business Partners.

5.6 POSSIBLE CONFLICT OF INTEREST SITUATIONS

5.6.1 Activities Related to Hiring Business Partners

Business Partners must be ethically, impartially, and objectively selected in the best interests of BRF. The following examples illustrate situations that may constitute a Conflict of Interest in the hiring of Business Partners, and these **ARE STRICTLY PROHIBITED**:



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- Employee exerts influence over the Procurement, Grains, and Agriculture Department to hire Business Partners who are related to Close Family Members;
- BRF's Key Persons influence the hiring of Business Partners with whom they have business or family connections;
- Employee exerts influence over the management of the contract of a Business Partner who employs a Close Family Member;
- Employee who discloses confidential Company information to a Business Partner who intends to do business with BRF;
- Employees who receive an invitation to conferences, seminars, or training sessions from a Business Partner taking part in a hiring or contract renewal process, with the expenses paid by the Business Partner (for more details, see also the Gifts, Presents, and Hospitality Policy).
- Employee (Sales Manager) has a relationship with the purchasing manager of a BRF customer;
- Employee (Production Manager) has a personal financial interest in competitor businesses.

5.6.2 Matters relating to the Human Resources Board

All hiring of Employees is subject to BRF's internal rules, as well as the provisions of this Policy and BRF's Transparency Manual. Employees can nominate candidates to participate in BRF's selection, recruitment, and hiring processes. However, it is essential that the Conflict of Interest is reported, and the Employee must not participate in and/or exert any influence on the selection process.

BRF's Human Resources Board adopts a form in the process of recruiting and selecting new Employees, and if there is a situation of Conflict of Interest, the process is sent for evaluation by Compliance, and it is up to the Human Resources Board and the manager of the vacancy to decide whether or not to hire.

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

- BRF Employees involved in the recruitment, promotion, or evaluation of Close Family Members or people with whom they have an Affectionate Relationship;
- BRF Manager requests tampering with official company documents to benefit Close Family Members or people with whom they have an Affectionate Relationship;
- The manager maintains an Affectionate Relationship with a direct or indirect subordinate in his/her department;
- BRF Auditor audits the activities of another Employee with whom he/she has an Affectionate Relationship or is a Close Family Member.
- The hiring by the Company of professionals from independent auditing firms without complying with the provisions of the document 03.11.041 - Regulamentação de Contratação de Pessoal de Empresa de Auditoria Independente / Regulation of Hiring Independent Audit Company Employee.



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5.6.3 Matters Related to Public Authorities and Relations with Public Officials (Politically Exposed Person - PEP).

BRF Employees who are Public Officials or Persons Related to Public Officials must declare this condition to their immediate Manager, the Human Resources Board, and the Compliance Board by completing and submitting the **PEP Declaration Form**. The hiring of new Employees who are Public Officials or Persons Linked to Public Officials may only be conducted after approval by the Compliance Board and the Human Resources Board.

Hiring suppliers whose partners or administrators are Public Officers or Persons Linked to Public Officers must also be declared by filling in the forms adopted by BRF's Procurement Department and may only be conducted after approval by the Compliance Board. Below are some examples of situations that may characterize a Conflict of Interest in the scope of the relationship with Public Authorities and must necessarily be evaluated by the Compliance Board and the Human Resources Board:

- Hiring a former civil servant for strategic positions in the Company;
- Hiring Public Agents who used to work for a government body or entity that exercises supervisory powers over BRF to provide services, consultancy, or similar activities; and
- Hiring Persons Related to Public Agents who work for a government body or entity that exercises supervisory powers over BRF to work at BRF or provide services, consultancy, or similar activities.

5.6.4 External/Parallel Activities

BRF Employees may work in secondary activities in other private institutions, whether paid or not, as long as **they are not for competitors or companies that provide services to competitors** and do not represent a Conflict of Interest for the Company. In addition, when conducting their secondary activities, Employees must avoid establishing business with Business Partners, i.e., people with a commercial relationship with BRF.

The disclosure or sharing of non-confidential and/or strategic BRF information at events, seminars, and lectures may only be done with the authorization of the Director of the department of which the Employee is a part. The Corporate Reputation Board must validate the material used. In the case of events in which the Employee will represent and/or speak on behalf of BRF, the Corporate Reputation Board must be consulted in advance.

5.6.5 Academic Studies, Master's Degrees and Term Papers

BRF supports and encourages academic publications and participation in scientific research, provided that these publications and studies do not generate situations of Conflicts of Interest, such as through the use of BRF facilities, material, media, or



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equipment. Therefore, if an Employee wishes to conduct an academic publication, they should adhere to the following recommendations: .

- BRF Employees MAY NOT share confidential Company information;
- The Employee must request a statement from the Educational Institution, in official communication (e.g., letterhead), by which the institution affirms that the information contained in the study or article will not be used for purposes other than academic;
- That there will be no commercialization or financial benefit for the institution;
- If materials with photos, videos, images, and BRF brands are to be presented, the Employee responsible must validate this in advance with the Corporate Reputation department and the Director of their department;
- BRF's name should be hidden from articles and term papers.

6. REFERENCE DOCUMENTS

6.1 APPLICABLE LEGISLATION

- CVM Resolution No. 80/2022, dated March 29, 2022, provides for the registration and provision of periodic and occasional information by issuers of securities admitted to trading on regulated securities markets.

- Guide from the US Department of Justice - DOJ (FCPA: *A Resource Guide to the US Foreign Corrupt Practices Act*).

- ISO Standard 37001 of 2017 - Anti-Bribery Management System.

- Law 12813/2013 deals with Conflicts of Interest in the exercise of office or employment in the Federal Executive Branch.

6.2 INTERNAL REFERENCE POLICIES

- 01.1.100 - *Manual de Transparência BRF / BRF Transparency Guide / Manual de Transparência BRF*.

- 01.1.102 - *Código de Conduta de Parceiros de Negócio da BRF / Code of Conduct for BRF Business Partners*.

- 03.11.041 - *Regulamentação de Contratação de Pessoal de Empresa de Auditoria Independente / Regulation of Hiring Independent Audit Company Employee*.



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- 06.3.003 - *Recrutamento e Seleção* - Applicable to Brazil only.
- 06.9.003 - *Diretriz para Negociações Coletivas com Entidades Sindicais* (Guidelines for Collective Bargaining with Trade Unions) - Applicable to Brazil only.
- 06.22.027 - Recruitment and People Selection - Applicable to the international market.
- 28.1.006 - *Política de Transações com Partes Relacionadas* / Related Party Transactions Policy.
- 28.1.012 - *Política Corporativa de Prevenção a Práticas Anticoncorrenciais* / Anti-Competitive Practice Prevention Corporate Policy.
- 28.3.003 - *Diretrizes para Aplicação de Consequências* - Applicable to Brazil only.
- 06.22.021 - Disciplinary Norm - Banvit.
- 06.22.028 - Disciplinary Norm - Qatar.
- 06.22.029 - Disciplinary Norm - Oman.
- 06.22.030 - Disciplinary Norm - Kuwait.
- 32.7.001 - *Relacionamento Institucional* / Institutional Relations / *Relaciones Institucionales*.

7. FINAL PROVISIONS

This document is valid as from the date of its issue, revoking any provisions to the contrary 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. The recipients of this Policy are aware that failure to comply with it, as well as failure to comply with Applicable Legislation and other BRF policies, such as the BRF Transparency Manual, may be subject to internal disciplinary procedures under the Consequence Guidelines without prejudice to any applicable legal measures.

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.



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8. APPROVALS

RESPONSIBLE	DEPARTMENT
ELABORATION	Compliance Board
REVIEW	Audit and Integrity Committee
APPROVAL	Board of Directors

GLOSSARY

Affectionate Relationships: BRF considers an affectionate relationship to be when there is an intimate or loving personal relationship, regardless of whether there is an ongoing relationship or a stable union.

BRF or Company: Refers to BRF S.A. and all its subsidiaries, national or international.

Business Partners: External parties with which the Company has or plans to establish a "Business" relationship. For this Policy, the term Business is broadly defined to mean those activities that are pertinent to the purpose of the Company's existence, thus including, but not limited to, customers, joint ventures, joint venture partners, consortium partners, third-party providers, contractors, consultants, subcontractors, suppliers, integrators, vendors, advisors, agents, distributors, representatives, intermediaries, investors, among others.

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

Close Family Members are those members of the family of a given person who can be expected to exercise influence over that person, or be influenced by that person, in that member's dealings with BRF and include (a) the 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) the ascendants by blood or by affinity (such as step-parents, step-mothers, parents-in-law) of such person; the sibling(s) and the brother-in-law(s).

Employees: These people are hired by BRF, working at all levels of the organization, including managers, senior managers, executives, directors, employees, internal



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consultants, interns, apprentices, trainees, home workers, part-time and fixed-term contract workers, and casual workers.

People: all BRF Employees and Business Partners.

Persons Related to Public Agents (PEPs): these are the following natural and legal persons related to the Public Agent:

- a) Their relatives in the direct line up to the second degree (grandparents, parents, children, grandchildren), spouse, partner, and stepchildren;
- b) Their close-knit Staff: (i) people with whom the Public Agent maintains a partnership or joint ownership in companies, with or without legal personality, are their agents or have any other type of close relationship that is publicly known; (ii) people who hold control of companies or societies with or without legal personality, known to have been created for the benefit of the Public Agent and
- c) Companies in which the Public Agent and/or individuals linked to them have a direct or indirect stake or from which they receive any benefit.

Public Agent or Politically Exposed Person (PEP): for this Policy, is anyone who holds or has held office in the last 5 years, on a temporary or permanent basis, 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 it exercises significant influence in decision-making through the law or participation in the Public Power;
- b) Political party leaders, as well as political representatives (municipal, state, district and federal);
- c) Leaders and representatives of international public organizations, such as the United Nations or the World Trade Organization.