



RELATIONSHIP AND COMMUNICATION WITH PUBLIC AGENTS POLICY

VERSION 1.1



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Marfrig's Compliance Policies may be adapted due to applicable laws in different jurisdictions. These adaptations, when issued, will be published through the document "Appendix- Country- Policy's Name" and will be available on the Intranet and local Human Resources.

1. PURPOSE

The purpose of this policy is to establish minimum guidelines for the relationship and a communication with Public Agents.

2. DEFINITIONS

Public Management: It is the structure composed by the municipal, state, district and federal entities, linked to any of the three powers, executive, legislative and judicial, belonging to Direct Management (chief executive, secretaries and ministries) or Indirect Management (municipalities, agencies, mixed-capital companies, public companies and public foundations).

Public Agent: It is any official of the government or any department, agency or instrument thereof, or a public international organization, or any person holding an official office for or in name of any government or department, agency, or behalf of any international public organization.

Company: Marfrig Global Foods S.A., its subsidiaries and the companies controlled and/or managed by it.

Conflict of Interests: Any situation in which an individual or legal person maintaining any form of business with the Company is involved in a decision-making process in which it has the power to influence and/or direct the outcome of that decision, ensuring a gain and/or benefit for himself, to any member of his family, or to any Third Party with whom he has any involvement, or be in a situation that could interfere with his ability to be impartial in a judgement.

Official Document(s): Refers to all service of process, summons, notification, publication, communication, and other convene documents or not issued by public entities.

Federal Inspection Service Public Agent: Is responsible for inspection and supervision from sanitary, hygienic and technological point of view of slaughterhouses, abattoirs, meat and fish canneries, lard and fat factories where animal origin products are used, dairy plants and factories, meat



stores, fish, milk, eggs, honey, wax and other derivatives of the cattle industry and, where possible, of all products of animal origin at the place of production, handling, storage and marketing.

Interested Parties: Controllers, shareholders, directors and members of Company's committees.

3. GOALS

- Establish guidelines to regulate the practice of communication and relationship with Public Agents;
- Establish minimum guidelines on the expected behavior of the Company's contributors, Interested Parties and Third Parties acting on Company's name, as well as to present internal control mechanisms for the prevention and detection of possible acts that may be interpreted and/or deemed as not in compliance.

4. PUBLIC

Applies across the entire value chain, regardless of geographic location. Thus, this policy is applicable to all contributors of the Company, Interested Parties and Third Parties acting on behalf of the Company.

5. CONTENT

All contributors, service providers and any third parties acting on behalf of or for the benefit of the Company shall pay special attention to the treatment of Public Agents. In such cases, one should never accept, offer, promise or accept promise, advantage or special treatment, not even the offering of gifts, even of small value.

In this sense, the relationship and communication with Public Agents must be mandatorily carried out in accordance with the following criteria, respecting the applicable laws and regulations, and always considering the most restrictive policy or procedure.

5.1. MEETING WITH PUBLIC AGENTS AND SUPERVISION

All meetings and/or reunions with Public Agents must have a defined and written agenda, list of participants, for consultation at any time, in order to improve transparency and it is recommended that they be held with the presence of more than one of Company's contributor.

Meetings and/or reunions that have deals with matters that do not concern the ordinary course of business shall have their prior scheduling accomplished by completing the specific form (Annex I) and forwarding it to the Compliance Department through the electronic address compliance@marfrig.com.br.



In the event of meetings and/or reunions related to Company's business routine, thus, in the ordinary course of business, contributors are exempt from completing the specific form.

Any clarifications may be required to the Company Compliance Department.

5.2. GIFTS, ENTERTAINMENT AND HOSPITALITY

It is strictly prohibited to any Contributor of the Company to offer and/or receive from Public Agents (including SIF agents), directly or through third parties, any undue advantage of any nature, whether in cash, entertainment invitations, hospitality, gifts or any good or service of value.

I must not be made, directly or indirectly, to public agents or persons holding similar positions, any economic favor, whether in cash, gifts or other kind.

5.3. PAYMENTS

It is prohibited to promise, offer or give undue advantage to Public Agents or third party linked to it in exchange of benefits and/or favors, as well as for any interaction that may be characterized as corruption, bribery or kickback and consequently influence a Public Agent, taking advantage of a personal relationship, for the practice of an act that could generate an undue advantage to the Company.

5.4. HIRING OF FORMER PUBLIC AGENTS

The hiring of former Public Agents will only be allowed after the expiration of the period established in Law No. 12,813 of 2013, which provides for Conflict of Interests of Public Agents. Any hiring must be submitted to the Compliance Department of the Company for evaluation and advice.

5.5. SIF – FEDERAL INSPECTION SERVICE

The Federal Inspection Service, known worldwide by the acronym S.I.F. and linked to the Department of Inspection of Animal Products - DIPOA, is responsible for ensuring the quality of edible and inedible products of animal origin intended for domestic and foreign markets, as well as for imported products.

These professionals are located at Company's premises and have direct relationships with contributors. Therefore, it is important that:

- Marfrig's Contributors avoid situations that may configure Conflict of Interests, even if it appears;
- Marfrig's Contributors do not share Company's confidential information;
- For official meetings and request of documents, contributors should follow the general guidelines of item 5.1 of this policy and formalize the specific form (Annex I);
- The Compliance department conducts periodic training with Marfrig's Contributors that interact with the professionals of the S.I.F (Federal Inspection Service) and other Public Agents.

Any misconduct of any nature will be subject to the application of legal and disciplinary measures.

6. GENERAL PROVISIONS

When there are potential conflicts among Company's internal rules and guidelines, contributors should guide their conduct by considering the most restrictive rule/guideline.

7. CONFIDENTIALITY STATUS

This is a public policy.

ANNEX I - FORM FOR COMMUNICATION AND RELATIONSHIP WITH PUBLIC AGENTS

INSTRUCTIONS TO THE CONTRIBUTOR RESPONSIBLE FOR THE:

- Fill in the complete information and identify which information is not applicable to the process;
- This form must be completed by the Contributor responsible for the relationship with the Public Agents, prior to the actual day of the event (meeting/meeting);
- Submit this form to the Compliance Department, duly approved (signed).

CONTRIBUTOR DATA FOR THE RELATIONSHIP:

NAME:	POSITION:
UNIT:	TELEPHONE:
E-MAIL:	MEETING DATE:
SIGNATURE:	

PUBLIC AGENT DATA:

CORPORATE NAME:	CNPJ:
DEPARTMENT:	COUNTRY/STATE/CITY:
NAME:	CPF:
TELEPHONE:	E-MAIL:

QUESTIONNAIRE

INDICATE THE EVENT APPLICANT (MEETING/REUNION):
EVENT THEME:
PURPOSE OF THE EVENT:
PLACE:
TELEPHONE:
DATE:

EVALUATION OF THE COMMUNICATION AND RELATIONSHIP WITH PUBLIC AGENTS	YES	NO
1. Will the meeting/reunion be conducted by Contributors authorized and designated by Marfrig?		
2. Does the meeting/reunion have a defined agenda and formalized in writing, with list of participants?		
3. Will the meeting/reunion be held at the premises of Marfrig or in the Public Body itself and respecting the good practices established in this policy?		
4. Will the meeting/reunion be held during business hours?		
5. Was the meeting/reunion disclosed and aligned with the Administrative Manager and/or Industrial Manager of the Unit?		
6. Is the meeting in accordance with the guidelines, as well as the applicable laws and regulations, with no risk of being interpreted as harmful to the Company and the Business for violating accepted principles and ethical values?		
7. Is the goal of the event related to Marfrig's activities and/or business?		
8. In case of request of documents by the Public Agents, did Marfrig's legal department review and approve the availability of the same?		

SIGNATURE OF THE ADMINISTRATIVE OR INDUSTRIAL MANAGER OF THE UNIT:
SIGNATURE OF COMPLIANCE OFFICER:
SIGNATURE OF THE LEGAL DIRECTOR:



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