

**POLICY ON DONATIONS AND SPONSORSHIPS  
FROM M. DIAS BRANCO S/A INDÚSTRIA E  
COMÉRCIO DE ALIMENTOS**

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**POLICY ON DONATIONS AND SPONSORSHIPS FROM M. DIAS BRANCO S/A INDÚSTRIA E  
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ALIMENTOS**

**1. DEFINITIONS**

1.1 The terms and expressions listed below, when used in this Policy, both in singular and plural, shall have the following meaning:

**“Public Agent”** – Any individual, whether civil servant or not, from any level or hierarchy, who exercises, even if temporarily or without remuneration, through election, appointment, designation, hiring or any other form of investiture or bond, mandate, position, employment or function in or for a Government Authority; any individual who works for a contractor or contracted service provider to perform typical Public Administration activities, as well as any political party leader, their employees or other persons who act for or on behalf of a political party or candidate for a public office. An individual who meets this definition, whether national or foreign, or who is employed or holds a position or function in international public bodies or organizations, will be considered a Public Officer.

**“Government Authority”** – very organization, department or entity of direct or indirect administration from any power of the Union, States, Federal District or Cities, legal entity incorporated to the public estate, or entity for which creation or costing the public funding has competed or competes with more than fifty per cent of the estate or annual revenue, or on which the State or Government may, directly or indirectly, have dominant influence (for owning the majority of the capital subscribed, controlling most votes, or having the right to appoint most members of the administration, managing group or fiscal council); as well as organizations, state entities or diplomatic representations from foreign country, as well as organizations, entities and persons controlled, directly or indirectly, by the public power from a foreign country, international public organizations or organisms, including sovereign funds or an entity owned by a sovereign fund.

**“Employees”** – All hired employees, Directors (statutory or not), members of the Board of Management, members of committees (statutory or not), members of the Fiscal Council, apprentices and interns in the Company, regardless of the position or job done.

**“Company” or “M. DIAS BRANCO”** – M. Dias Branco S/A Indústria e Comércio de Alimentos and its controlled companies.

**“Donation”** – Act where the donor, on free will, transfers financial resources from their assets or estimable in currency (goods, products, services, technical assistance, qualification, financial assistance, etc.) to another individual or legal entity, which accepts them.

**“Political Donation”** – Every Donation made to political campaign, political party and/or candidate to public office, whether during election period or not, in cash or estimable in cash.

**“Tax Incentive”** – Benefit established by law or by act from Government Authority that reduces the value of taxes owed by individuals and legal entities or allows the amortization of tax debts in special conditions, or also allows the exceptional use of tax credits.

**“Close Member”** – In relation to a person, their spouse or partner, blood-related or similar, in straight line (upward or downward) or collateral, up to the second degree of family relations.

**“Sponsorship”** – Any contribution, financial or not, given to actions and initiatives from third parties that are related to culture, education, sports, professional, economic and social development, regional and environment integration and development, or which topics converge with the institutional mission, values, integrity policies and interests from the Company, and that aims at some type of counterpart to the Company. The counterpart may be the publicity of the name, the Company operation, strengthening of a concept, professional qualification, addition of value to the brand, generation of recognition, or expansion of the relationship between the sponsor and its public of interest.

**“Politically Exposed Person”** – The Public Agents who perform or have performed, over the past five (5) years, in Brazil or other countries, territories and foreign facilities, jobs, positions or functions described in the Resolution number 29 from the Financial Activity Control Council (COAF).

**“Donation or Sponsorship Project”** – Document necessary to the formalization of contractual instrument of Donation or Sponsorship, including basic information about the beneficiary of the Sponsorship or Donation, and also of the project aimed at being implemented, within the terms of this Policy.

**“Third Parties”** – Every individual or legal entity that is not a Company Employee or that is hired to help perform its activities, such as partners, consortium members, representatives, suppliers, service providers in general, consultants, outsourced parties, agents or intermediates that act on behalf of the Company.

**“Undue Advantage”** – Any good or benefit, tangible or intangible, including

money and sums, offered, promised or given with the purpose of influencing or rewarding any act or decision from a Public Officer or Third Party.

## **2. PURPOSE AND SCOPE**

2.1. This Policy on Donations and Sponsorships from M. Dias Branco S/A Indústria e Comércio de Alimentos (“Policy”) has the purpose of establishing rules, guidelines and methods to be followed by the Company for making Donations and Sponsorships involving the transfer of goods or services that are an integral part of the Company assets, including monetary values, to ensure that the Donations and Sponsorships are made with high ethical standard, transparency, responsibility and legality.

2.2. The provisions in this Policy shall be interpreted together and complement the conduct guidelines established on the Code of Ethics, the Anti-Corruption Policy, and in the Policy on Gifts, Souvenirs, Entertainments and Hospitalities from the Company.

2.3. The rules established in this Policy apply to the Company and all its Employees and Third Parties.

2.3.1. In the case of partnerships with investment from M. DIAS BRANCO that are not its controlled companies, the Company shall make its best efforts so that such partnerships adopt policies and practices that are in line with this Policy.

## **3. REFERENCES**

3.1. This Policy was developed in compliance with the following rules:

- (i) Law number 12846, from August 1, 2013 (Brazilian Anti-Corruption Law);
- (ii) Decree number 8420, from March 8, 2015;
- (iii) Company’s Anti-Corruption Policy; and
- (iv) Company’s Code of Ethics.

## **4. GENERAL GUIDELINES**

4.1. All Donations and Sponsorships made by the Company have the purpose of disclosing the name and brand from M. DIAS BRANCO, as well as fostering the social, professional, economic, technological and corporate development of regions where the Company is present, and must be

made in compliance with the law and rules established in this Policy, in the Code of Ethics and in the Company's Anti-Corruption Policy.

4.1.1. Following what is established in this Policy, the Company will only make Donations and Sponsorships to reliable and upstanding entities and institutions (check item 4.6), motivated by legitimate philanthropic reasons and in support to humanitarian, social, cultural, sports, environmental, professional and educational causes, as well as actions related to the well-being of the community where the Company has operations or performs commercial activities associated to its business.

4.2. As established in this Policy, the Donations and Sponsorships shall have prior analysis and approval by the Company's internal organizations, according to the rules on levels included in the Company's internal policies, which will also assess the compliance with legal requirements, including the ones of fiscal and financial nature, in addition to the strict adherence to the project proposed, supporting documentation, its transparency, trustworthiness of the information, and formalization of accountability.

4.3. Making Donations and Sponsorships shall comply with the rules on approval levels included in the Company's internal policies, especially the Policy on Levels and the Policy on Purchases approved by the Board of Management.

4.4. Giving, offering or promising Donation or Sponsorship will be considered a breach to this Policy when the act may influence inadequately any commercial decision that affects the Company or may result in conflict of interest or in Undue Advantage to the Company, its Employees, Third Parties or Public Officer.

4.5. The Donations and Sponsorships by the Company shall follow these general guidelines:

- (i) They are in compliance with all laws, regulations and policies from the Company;
- (ii) Projects, initiatives or events which proposal is in line with the Company's principles, values, goals and institutional and brand positioning strategy are selected;
- (iii) Institutions are selected which reliability/integrity can be verified (check item 4.6), with the use of Donations and/or Sponsorships as a mean to pay for illicit activities or payments or to obtain Undue Advantages, in own benefit or in benefit of third parties, not being tolerated;
- (iv) Adequate measures to prevent and avoid acts of corruption and/or situations of potential conflict of interest are adopted, in line with the principles reflected in the Company's Code of Ethics and Anti-Corruption Policy;

- (v) All resources spent with Donations and Sponsorships are accounted for adequately and reliably;
- (vi) Each and every Donation or Sponsorship must be duly formalized by supporting documentation and contractual instrument, which shall necessarily include the provisions indicated on Clause 7.7 below; and
- (vii) They must not be granted to related parties, Employees and/or Third Parties who, somehow, may present conflict of interests with the guidelines and ethical and conduct values from the Company and/or that may expose it to undesirable risks.

4.6. Donations and Sponsorships by the Company are forbidden in the following cases:

- (i) They are associated to any type of political-partisan campaign, political parties, or also involve the personal promotion of Government Authority, Public Officer or Member Close to Public Officer, directly or indirectly;
- (ii) They are associated to activities that (a) cause or may cause negative social-environmental impact; (b) encourage any form of violence, child labor, slave labor, forced labor, or mistreatment to animals; (c) promote gambling or have speculative purposes; and/or (d) incentive the consumption of alcohol, cigarettes or forbidden substances;
- (iii) They express transgression, restriction, or corroborate prejudice against minorities, or imply any type of social, racial or gender discrimination;
- (iv) They generate exclusive dependency on the continuity of the benefit to an entity;
- (v) To people and/or entities that are restricted on the following organizations:
  - (a) National Registration of Unsuitable and Suspended Companies (CEIS);
  - (b) Registration of Blocked Non-Profit Private Entities (CEPIM);
  - (c) National Registration of Punished Companies (CNEP);
  - (d) National Registration of Criminal Convictions for Actions of Administrative Misconduct (CNIA) from the National Justice Council – CNJ; and
  - (e) List of de Disabled and Unsuitable Parties from the Federal Audit Court – TCU.
- (vi) To people and/or entities with repeated negative exposure in the media and different communication outlets;
- (vii) Through forwarding funds in cash; and
- (viii) In a form different from the one included in this Policy and/or in the Donation or Sponsorship Project.

4.7. It is expressly forbidden to give, offer or promise Donations and/or Sponsorships by any Third Parties acting in the interest or benefit of the Company.

4.8. All expenses incurred related to Donations and Sponsorships shall be launched with sufficient details and thoroughly in the Company's accounting records. The Company's Accounting area shall make sure that the records will include, as a minimum, the nature of the expense incurred, addressee, the due supporting documentation, and the value of the act. The Sustainability area must certify the information above when approving the documents in the Company's computing systems so that the accounting records are correctly fed.

4.9. The Company's Sustainability area shall maintain in archive, for the period determined by law, all supporting documents related to Donations and Sponsorships, to comply with future audits or evidence required by internal control instances, external entities, or Government Authorities.

4.10. If a Company Employee is not sure about what correct attitude to take in a certain situation related to the contents of this Policy, such employee shall contact the Company's Ethics Channel or, if not available, contact any member from the Ethics Committee for due guidance.

## 5. SPECIFIC GUIDELINES FOR DONATIONS

5.1. All Donations must follow the general guidelines and procedures included in this Policy and in other internal rules applicable.

5.2. It is forbidden to donate to:

- (i) Individuals, except if and provided that there is justified interest, with reasoned report from the Sustainability area and prior approval from the Company's Ethics Committee;
- (ii) Entities that are managed, directly or indirectly, by Politically Exposed People, Public Officers or Members Close to Public Officers, who have their activities related to the Company's business, with the goal of avoiding a situation that generates potential conflict of interest; and
- (iii) Entities that are managed, directly or indirectly, by Company Employees or Members Close to Company Employees of the Company, with the goal of avoiding a situation that generates potential conflict of interests or Undue Advantage.

5.2.1. Following what is established on Clause 5.2.(ii) above, if the entity is managed, directly or indirectly, by a Politically Exposed Person, Public Officer, or Members

Close to Public Officers, but their activities have no relation to the Company business, the Donation will be possible, provided that the reputation checking procedures are executed beforehand by the Audit, Risks and Compliance Directorate and approved by the Ethics Committee.

5.3. The Company may make Donations that are (i) beneficent in nature, targeted at philanthropic, non-profit entities; and (ii) institutional in nature, whether through cooperation, partnership or support to cultural, scientific, educational, professional and public entities, provided that they are in line with the Company's strategic goals, principles and values.

5.4. The Donations can be made through (i) delivery of goods without use or obsolete that comprise the Company estate; (ii) delivery of finished products produced by the Company; (iii) hiring of services or purchase of goods for Donation purposes; and (iv) transfer of financial values, in the form established on the Donation or Sponsorship Project.

- Donations of finished products must always be made respecting the validity date of the products and with precaution for products close to expiring, in order to avoid food safety issues;
- Donations in cash are not permitted;
- This Policy does not refer to awards and donations made to Company employees.

5.5. In addition to the general guidelines included in this Policy, the entity that benefits from Donations must meet the following requirements:

- (i) Be a non-profit legal entity, in the case of private social investments;
- (ii) Include, in its corporate purpose or area of operation, an activity compatible with the proposal for Donation;
- (iii) Be located at a site where the Company has a substantial number of Employees, or has commercial, professional or institutional interest;
- (iv) Must foster culture, sports and/or professional qualification and preferably cater to children, teenagers and young people up to twenty-four (24) years old, elderlies, as well as people with disabilities at any age; and
- (v) Prioritize causes related to people in social vulnerability conditions.

#### ***Donations through Incentive Laws***

5.6. In addition to the aforementioned specific guidelines, the Donation that, due to incentive law, originates a Tax Incentive for the Company shall meet the following requirements:

- (i) Involve projects that comply with incentive laws, existing or to be approved, including topics related to childhood and teenage years, sports, culture, health, care for elderlies and people with disabilities, and other topics related to humanitarian causes, citizenship and well-being, including as a priority initiatives with social impact in the communities around the Company's operations or where the company has commercial, professional or institutional interest; and
- (ii) Involve programs or projects approved by government organizations in the federal, state, district or municipal levels.

### ***Political Donations***

5.7. The Company is forbidden to make any Political Donations, in the terms of the legislation in force.

5.8. Eventual personal Political Donations made by Company Employees when freely exercising their citizenship shall strictly follow the method included in the legislation and must not, directly or indirectly, link or associate to the Company's image or brand, or aim at obtaining any Undue Advantage, conflict of interests, personal benefit and/or exchange of favors involving the Company or the own Employee.

## **6. SPECIFIC GUIDELINES FOR SPONSORSHIPS**

6.1. All Sponsorships must follow the general guidelines and procedures included in this Policy and in other internal rules applicable.

6.2. It is forbidden to give Sponsorships to:

- (iv) Individuals, except if and provided that there is justified interest, with reasoned report from the Sustainability area and prior approval from the Company's Ethics Committee;
- (v) Entities that are managed, directly or indirectly, by Politically Exposed People, Public Officers or Members Close to Public Officers, who have their activities related to the Company's business, with the goal of avoiding a situation that generates potential conflict of interest; and
- (vi) Entities that are managed, directly or indirectly, by Company Employees or Members Close to Company Employees of the Company, with the goal of avoiding a situation that generates potential conflict of interests or Undue Advantage.

6.2.1. Following what is established on Clause 6.2.(ii) above, if the entity is managed, directly or indirectly, by a Politically Exposed Person, Public Officer or Members Close to Public Officers, but their activities have no relation to the Company business, the Sponsorship will be possible, provided that the reputation checking procedures are executed beforehand by the Audit, Risks and Compliance Directorate and approved by the Ethics Committee.

6.3. The Company may offer Sponsorships that are institutional in nature, whether through cooperation, partnership or support to cultural, scientific, educational, professional and public entities, provided that they are in line with the Company's strategic goals, principles and values.

6.4. The Sponsorships will be given through (i) transfer of financial values; or (ii) exchange of products, goods or services, in the form established in the Donation or Sponsorship Project.

6.5. In addition to the general guidelines included in this Policy, the entity that benefits from Sponsorships must meet the following requirements:

- (i) Be a non-profit legal entity, in the case of private social investments;
- (ii) Include, in its corporate purpose or area of operation, an activity compatible with the proposal for Sponsorship;
- (iii) Be located at a site where the Company has a substantial number of Employees, or has commercial, professional or institutional interest;
- (iv) Must foster culture, sports and/or professional qualification and preferably cater to children, teenagers and young people up to twenty-four (24) years old, elderlies, as well as people with disabilities at any age; and
- (v) Prioritize causes related to people in social vulnerability conditions.

### ***Sponsorships through Incentive Laws***

6.6. In addition to the aforementioned specific guidelines, the Sponsorship that, due to incentive law, originates a Tax Incentive for the Company shall meet the following requirements:

- (i) Involve projects that comply with incentive laws, existing or to be approved, including topics related to childhood and teenage years, sports, culture, health, care for elderlies and people with disabilities, and other topics related to humanitarian causes, citizenship and well-being, including as a priority initiatives with social impact in the communities around the Company's operations or where the company has commercial, professional or institutional interest; and

- (ii) Involve programs or projects approved by government organizations in the federal, state, district or municipal levels.

## 7. PROCEDURES

### *Analysis, Approval and Formalization*

7.1. Any request or proposal for Donation or Sponsorship shall be sent to the Company's Sustainability area through Form for Request of Donation and Sponsorship included on **Annex I** of this Policy. The requests for Sponsorship related to commercial strategies and for disseminating and strengthening the Company's brands shall be forwarded to the Company's Marketing area, using the same form.

7.1.1. In addition to the form, the request or proposal for Donation or Sponsorship must be accompanied with the following documents:

- (i) if legal entity: (i.a) Copy of the updated act of constitution of the entity (e.g. Social Contract or Bylaws); (i.b) Proof of registration at the National Registration of Legal Entities (CNPJ); (i.c) Proof of mandates of managers in force at the entity; (i.d) Copy of the identity card from legal representatives; (i.e) Proof of registration status of CPF from legal representatives issued by the Brazilian IRS; and (i.f) proof of regularity of the entity with the registrations indicated on Clause 4.6.(vi) above;
- (ii) if individual: (ii.a) Copy of the identity card; (ii.b) Proof of registration status of CPF issued by the Brazilian IRS; and (ii.c) proof of regularity with the registrations indicated on Clause 4.6.(vi) above.

7.1.1.1. For urgent demands, exceptionally, the Legal area may be consulted by the Sustainability or Marketing areas about what type of documentation can be forwarded after beginning the analysis of the request or proposal for Donation or Sponsorship (it will not depend on prior sending), provided that it is forwarded until the date of resource/product clearing. The same guidance will be used for the procedures indicated in other items from this Clause Seven.

7.1.2. Additionally, requests or proposals for Donation and Sponsorship that involve Tax Incentive shall be instructed along with the publication of official act, with

prior approval from the relevant Government Authority (e.g. Ministry, Special Secretariat, State Secretariat, City Government and others), or to whom such authority delegates attribution, with the approved project title and the institution responsible for it, the value authorized for obtaining Donation or Sponsorship, and the validity period of the authorization.

7.1.3. In addition to requests and proposals for Donations and Sponsorships coming from third parties, the own Sustainability area may formulate recommendations on entities to be benefited, always according to the Company's best interest and to the rules and guidelines included in this Policy.

7.2. The Sustainability area will analyze, in a preliminary manner, whether the request or proposal for Donation or Sponsorship is compliant with the terms and guidelines included in this Policy and eventual specific procedures for Donations and Sponsorships and, if affirmative, shall prepare a report with key information on the entity, including, as a minimum: (i) corporate name; (ii) CNPJ/CPF number; (iii) headquarters address; (iv) reason for approving the request or proposal for Donation or Sponsorship; (v) copy of the documentation indicated on Clause 7.1 above; and (vi) signature of the person responsible for the analysis.

7.2.1. The preliminary analysis will be conducted by the Company's Marketing area, concerning the fit of the Sponsorship with the commercial and publicity strategies and strengthening of the Company's brand.

7.3. With the preliminary analysis conducted, the requests or proposals for Donation or Sponsorship, along with the report developed by the Sustainability or Marketing area, will be forwarded for reputation checking to be conducted by the Audit, Risks and Compliance Directorate.

7.4. Based on the documentation received, the Company's Audit, Risks and Compliance Directorate will assess the integrity and reputation profile from the benefited entity and its managers, legal representatives and similar, through information made available publicly in search engines, triage sources, questions to the contacts provided, registration and public restriction lists, and/or other legally accessible tools, in order to (i) certify the adherence of the request or proposal for Donation or Sponsorship to the requirements included in this Policy; and (ii) identify any risk of integrity, conflict of interests, or Undue Advantage involving the benefited entity, its managers, legal representatives and similar, including, but not being limited to, mapping of Politically Exposed Persons.

7.5. From the result of the reputation checking, the Audit, Risks and Compliance Directorate will issue an opinion approving or rejecting the request or proposal for Donation or Sponsorship.

- If the request or proposal for Donation or Sponsorship is approved, all related documents will be forwarded to the Company's Sustainability or Marketing area, as the case may be, for (i) inclusion in the Donation or Sponsorship Project and submission to the sphere of approval; (ii) request to the Legal department for preparing the adequate contractual instrument (see item 7.7); and (iii) archiving and filing of the supporting documentation.
- In case of rejection to the request or proposal for Donation or Sponsorship, the process will return to the Sustainability or Marketing area, as the case may be, which shall inform the rejection to the requesting entity.

7.6. The Donation or Sponsorship Project shall be catalogued and archived by the Company's Sustainability and/or Marketing area, as the case may be, and must include the following items:

- (i) Purpose and detailed description of the action;
- (ii) Justification for the execution;
- (iii) Target audience and estimated number of people that will participate on or be benefited by the action;
- (iv) Period and place of execution;
- (v) Budget of the global project cost and list of expenses (items) to be paid with resources from the Company;
- (vi) Schedule for payment;
- (vii) In the case of Sponsorship, proposals of counterparts for the Company;
- (viii) In the case of transfer of financial resources, indication of checking account owned by the beneficiary, bank and branch number for depositing the funds, and copy of the account demonstration to confirm the ownership of the checking account;
- (ix) Entity name, CNPJ number, telephone, e-mail, tax domicile, mailing address, name of the proponent's legal representative, position, nationality, marital status, profession, CPF number, identity document number, issuing organization, and full address; and
- (x) Periodicity and accountability method.

7.7. The contractual instruments related to the request or proposal for Donation or Sponsorship shall necessarily include the following items:

- (i) The object and its characteristic elements, with detailed, objective, clear and precise description of what is intended to do or obtain, in line with the Work Plan, which shall be an integral part of the contractual instrument;
- (ii) Rights and obligations from each of the parties, including the counterparts in case

- of Sponsorship;
- (iii) The necessity of answering to the Company and to the relevant Government Authority, if there is use of Tax Incentive, including the timely presentation of evidentiary documents and the possibility to conduct inspections and technical visits to the institution's facilities, at discretion of the Company;
  - (iv) Clause on joint responsibility of the director or legal representative subscribing the contractual instrument, due to eventual default in accounting, especially because of the return of values and collateral damages caused to the Company or third parties in the execution of the object of Donation or Sponsorship;
  - (v) Commitment of sole responsibility for any damages caused to third parties due to the execution of the activity object of Sponsorship or Donation;
  - (vi) Clause against corruption, conflict of interests and Undue Advantage, fight to money laundering and equivalent, on prevention to child, slave and forced labor, prevention to discriminations and prejudice of any type, in compliance with the Company's Code of Ethics and Anti-Corruption Policy;
  - (vii) The prohibition to forwarding, directly or indirectly, resources (whether financial or not) donated or sponsored by the Company to other entities or individuals, other than the one originally designated as beneficiary on the Donation and Sponsorship Project.
  - (viii) Mechanism for monitoring and accounting the correct application of resources, in the form of Clauses 7.9 to 7.17 below; and
  - (ix) Forecast on sanctions and fines in cases of failure to comply with obligations.

### ***Forwarding Resources, products, goods or services***

7.8. Financial resources, products, goods or services to the beneficiary entity will be forwarded after the due execution of contractual instrument on Sponsorship or Donation by both parties.

7.8.1. The forwarding shall be conducted exclusively in benefit of the beneficiary entity, in a designated place or to the bank account identified in the Donation and Sponsorship Project, being forbidden to deliver products, goods or services or to make payments to benefit any third party.

### ***Accountability***

7.9. Accountability is the proof that the resources included in the contractual instrument of Donation or Sponsorship are having or have had good and regular application. Therefore, it is necessary to make evident that the resources are being or have been used according to the activities included in the formalized contractual instrument, in compliance with what was planned and

approved through the Donation or Sponsorship Project.

7.10. The accountability periodicity shall be defined in the respective contractual instrument and in the Donation or Sponsorship Project, according to the characteristics of each project.

7.11. The beneficiary entity shall forward to the Company's Sustainability area, within the terms established in the contractual instrument and in the Donation or Sponsorship Project, a report with accountability on the application/execution of the resources received (and counterpart, if applicable), along with the supporting documentation demonstrating the results achieved and correct application of resources.

7.12. The expenses will be proven by presenting a copy of the corresponding invoices or equivalent documents, according to specific legislation, along with the respective valid payment slips.

7.12.1. The invoices or equivalent documents must be necessarily issued for the beneficiary entity, except in cases when there is a legal indication that they must be issued for third parties. The fiscal documents must include, as a minimum: (i) CNPJ number; (ii) full address; (iii) full description of services or products; (iv) unit and total value, using the selling price at the time as a base.

7.13. The beneficiary entity shall present an accountability report that is sufficiently detailed and, when applicable, must attach to the report a photographic and/or video registration, samples of publicity materials and other materials produced, as well as a copy of articles that may have been published in the media, to prove the results and execute the counterparts mentioned in the particular instrument and in the Donation or Sponsorship Project.

7.14. The Company will not make a new transfer of resources (financial or not) while the beneficiary entity is late for the presentation of accounting related to any contractual instrument entered into with the Company, and also will not enter into new contractual instruments for Donation or Sponsorship with the beneficiary while its accountability is pending delivery and approval.

#### ***Accountability in case of Tax Incentive***

7.15. In the case of Donations and Sponsorships with the use of Tax Incentive, the accountability shall be made by the beneficiary entity to the relevant Government Administration organization. The beneficiary entity will be subject to control by the relevant external control organizations, especially the ones responsible for inspecting the use of Tax Incentive and the Audit Courts.

7.16. The beneficiary entity shall forward to the Company's Sustainability area an accountability report, detailing how the resources received from the Company were applied. The accountability report shall include document evidence that the beneficiary submitted to the assessment from the relevant Government Authority and that the respective accounts were approved and deemed regular.

***Penalties in case of failure to execute, non-compliance in the execution of the particular instrument and on the Donation or Sponsorship Project, or failure in accountability***

7.17. The beneficiary entity shall give back to the Company the value forwarded and/or good or service granted, updated monetarily from the reception date, in the following hypotheses;

- (i) Failure to execute the action object of the Donation or Sponsorship, for any reason;
- (ii) Cancellation of the action for any reason, even if because of act of God or force majeure;
- (iii) Failure to present the accountability report;
- (iv) Rejection of accounts presented;
- (v) Use of resources for a purpose other than the one established in the contractual instrument of Donation or Sponsorship; and
- (vi) Failure to comply with any clauses or conditions from the contractual instrument of Donation or Sponsorship.

**8. RESPONSIBILITIES**

8.1. The Sustainability area is responsible for:

- Receiving the requests or proposals for Donation or Sponsorship forwarded by third parties.
- Formulating recommendations on entities to be benefited with Donations and Sponsorships, always according to the Company's best interest and to the rules and guidelines included in this Policy.
- Making a preliminary analysis of requests or proposals for Donations and Sponsorships, checking the due compliance with the rules and guidelines included in this Policy, as well as requesting a reputational check to the Audit, Risks and Compliance Directorate.
- Maintaining in archive, for the period determined by law, all supporting documents related to Donations and Sponsorships, to comply with future audits or evidence required by external entities, or Government Authorities.

- Developing the Donations and Sponsorships Projects, within the terms included in this Policy.
- Requesting Support to the Fiscal, Accounting, Legal and Compliance areas during the development and execution of the Donation or Sponsorship Projects.
- Informing the refusal to give Donations and Sponsorships to the requesting entities.
- Receiving and analyzing the accountability reports sent by the beneficiary entities, within the terms included in this Policy.

8.2. The area of Audit, Risks and Compliance and the Ethics Committee are responsible for:

- Clarifying eventual doubts from Employees concerning the processes of Donations and Sponsorships;
- Conducting the reputation checking procedure in relation to the requests or proposals for Donations and Sponsorships, within the terms included in this Policy.
- Approving Donations and Sponsorships to individuals or entities managed, directly or indirectly, by Politically Exposed Person, Public Officer or Members Close to Public Officers, but whose activities have no relation with the Company business, within the terms included in this Policy.

8.3. The Legal department is responsible for:

- Supporting the areas involving in Donations and Sponsorships processes concerning any legal aspects.
- Developing the contractual instruments of the Donations and Sponsorships, within the terms included in this Policy.

8.4. The Marketing area is responsible for:

- Receiving the requests or proposals for Donation or Sponsorship forwarded by third parties.
- Formulating recommendations on entities to be benefited with Donations and Sponsorships, always according to the Company's best interest and to the rules and guidelines included in this Policy.
- Making a preliminary analysis of requests or proposals for Donations and Sponsorships, checking the due compliance with the rules and guidelines included in this Policy, as well as requesting a reputational check to the Audit, Risks and Compliance Directorate.

- Maintaining in archive, for the period determined by law, all supporting documents related to Donations and Sponsorships, to comply with future audits or evidence required by external entities, or Government Authorities.
- Developing the Donations and Sponsorships Projects, within the terms included in this Policy.
- Requesting Support to the Fiscal, Accounting, Legal and Compliance areas during the development and execution of the Donation or Sponsorship Projects.
- Informing the refusal to give Donations and Sponsorships to the requesting entities.
- Receiving and analyzing the accountability reports sent by the beneficiary entities, within the terms included in this Policy.

□

8.5. The Accounting and Fiscal area is responsible for:

- Registering the expenses incurred with Donations and Sponsorships into the Company accounting, in a sufficiently thorough and detailed way, within the terms included in this Policy.
- Supporting, by demand, the areas involved in the Donations and Sponsorships processes concerning fiscal aspects, including issues related to Tax Incentives.

8.6. The Board of Management is responsible for:

- Approving potential changes and reviews to this Policy.
- Regulating the cases hidden from this Policy.
- Processing the non-compliance with obligations and rules established in this Policy and deliberating on such non-compliance, as applicable.

## 9. BREACH ON POLICY

9.1. The failure to comply with this Policy will subject the violator to disciplinary sanctions, according to the Company's internal rules (*e.g.* Company's Code of Ethics), without detriment to the applicable administrative, criminal and penal sanctions, enforceable by the relevant authorities.

## 10. VALIDITY AND AMENDMENTS

10.1. This Policy comes into force on the date indicated below, after being approved by the Company's Board of Management. Any change or review shall be submitted to the Board of Management itself.

11. FINAL PROVISIONS

*Validity: as of January 2, 2020.*

*1st Draft: August 9, 2019.*

*Responsible for the document:*

<i>Step</i>	<i>Responsible</i>
Development	Organizational Development Directorate Legal Directorate
Review	Audit, Risks and Compliance Directorate
Review	Governance Committee
Review	Audit Committee
Approval	Board of Management

*Record of changes:*

<i>Version</i>	<i>Item Changed</i>	<i>Reason</i>	<i>Date</i>
01	Original Draft	N/A	[ -- ]

\* \* \*

**ANNEX I**

**DONATION AND SPONSORSHIP REQUEST FORM**

<b>Name or Corporate Name (or indication of Government Authority):</b>	
<b>CNPJ/MF or CPF/MF:</b>	<b>Full Address:</b>
<b>Legal Nature (e.g. private initiative, social organization, association, government authority, etc.):</b>	
<b>Name and Position of Signatory Legal Representative:</b>	
<b>CPF/MF:</b>	<b>Full Address:</b>
<b>Detailed description of the request for Donation or Sponsorship (basic quantitative, qualitative and conceptual information on the proposal, including the focuses of the initiative, social-environmental benefits expected, etc.):</b>	
<b>Name of Project/Event:</b>	
<b>Place:</b>	<b>Date or Period of Execution:</b>
<b>Target Audience:</b>	<b>Value of Proposal:</b>
<b>Type of Tax Incentive (if applicable):</b>	
<b>Justification (reasons that lead the requester to believe in possible support by the Company):</b>	

*[place],*  
*[date]*

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*[include name and signature of requester]*