

## 1. OBJECTIVE

- 1.1** This Gifts, Presents, Entertainment and Hospitality Policy of M. Dias Branco S/A Indústria e Comércio de Alimentos (“Policy”) aims to establish the rules, guidelines and methods to be observed by the Company’s Employees in relation to the concession, offering, promising and/or receiving Gifts, Presents, Entertainment and Hospitality, taking into account the need to avoid real, potential or perceived conflicts of interest and situations that could characterize bribery or corruption.
- 1.1.1** This Policy doesn’t refer to the granting, offer, promise and/or receipt of Gifts, Presents, Entertainment and Hospitality between Employees, nor to corporate commercial or marketing actions carried out by the Company at a national or regional level, respecting applicable legislation and regulations, with the aim of strengthening institutional relationships with customers or encouraging sales to their consumers.
- 1.2** The provisions of this Policy must be interpreted together and complement the conduct guidelines established in the Code of Ethics, the Anti-Bribery and Anti-Corruption Policy and the Company’s Donations and Sponsorships Policy.

## 2. APPLICATION

- 2.1** The rules established in this Policy apply to the Company and all its Employees and Third Parties, as applicable.
- 2.1.1** In the case of companies invested by M. DIAS BRANCO that are not its subsidiaries, the Company must make its best efforts to ensure that such companies adopt policies and practices in line with this Policy.

## 3 RESPONSIBLE MANAGERS

Legal, Governance, Risks and Compliance Vice-presidency;

ESG Committee;

Audit Committee;

Administrative Council.

## 4 DESCRIPTION

### 4.1 General Guidelines

- 4.1.1** Gifts, Presents, Entertainment and/or Hospitality may only be granted, offered, promised and/or received if the following general requirements are met:
- (i) Comply with all laws, regulations and Company corporate policies;
  - (ii) Are granted, offered, promised and/or received: (a) to assist in promoting the brand, demonstrating or explaining products and services; (b) on formal occasions such as, for example, meetings with senior management of major partners, customers or suppliers; (c) to

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- comply with a proven and relevant tradition for M. DIAS BRANCO; (d) to celebrate special dates proven to be relevant to M. DIAS BRANCO; and (e) at official corporate ceremonies or events;
- (iii) Are granted, offered, promised and/or received in a transparent and non-secret manner, in order to avoid any embarrassment for the Company and/or its Employees in the event of public exposure; and
  - (iv) Are granted, offered, promised and/or received without any expectation of reciprocity, obligation, or favor in return.

- 4.1.1.1 For the purposes of Clause 4.1.1.(ii)(e) above, the “official” nature of the ceremony or corporate event presupposes the organization's prior knowledge of the event's holding. In other words, at least one member of the Company's Board of Directors (Statutory or not) must have prior knowledge of the corporate purpose and details of the event.
- 4.1.2 Subject to the provisions of this Policy, whenever it is intended to offer Gifts, Presents, Entertainment and/or Hospitality, prior formal consultation must be carried out with the benefited people or entities, in order to guarantee compliance with the respective codes of conduct or ethics. If it is not possible to carry out a formal prior consultation, an informal consultation must be carried out at the time of delivery, ensuring that there are no incompatibilities for both parties.
- 4.1.3 The granting, offering, promise or receipt of Gifts, Presents, Entertainment and/or Hospitality, regardless of the value, will be considered a violation of this Policy, when the act may inappropriately influence any commercial decision that affects the Company or that may result in conflicts of interest or an Undue Advantage for the Company, its Employees or Third Parties.
- 4.1.4 The granting, offering, promise and/or receipt of Gifts, Presents, Entertainment and/or Hospitality by any Third Party acting in the interest or benefit of the Company is strictly prohibited.
- 4.1.5 The granting, offering, promise or receipt of Gifts, Presents, Entertainment and/or Hospitality must not occur on a habitual basis for the same Employee or individual, Public Agent or not. The occurrence of these events more than 2 (two) times in a period of 12 (twelve) months is considered “usual”. If such a situation occurs, the Ethics Committee must be previously consulted through the Company's Ethics Channel system, or if unavailable, directly to one of its members.
- 4.1.6 All expenses incurred related to Gifts, Presents, Entertainment and/or Hospitality must be recorded in a sufficiently detailed and complete manner in the Company's accounting records. The Company's accounting area must ensure that the recording will be carried out in appropriately disclosed accounting accounts and will include the nature of the expense incurred, the recipient, the value of the act and the respective supporting documentation.
- 4.1.7 Employees must report, within fifteen days, the granting, offer, promise or receipt of Gifts, Entertainment and/or Hospitality in accordance with the criteria established in this Policy, using the form contained in Annex I of this Policy, sent as attached to the Company's Ethics Channel system, or if unavailable, sent directly to one of the members of the Company's Ethics Committee.
- 4.1.8 In case of receiving a Gift, Present, Entertainment or Hospitality that does not comply with the guidelines set out in this Policy, the Employee must necessarily refuse it and/or return it immediately.
- 4.1.8.1 If the Gift, Present, Entertainment or Hospitality can be refused and/or returned, the refusal must be formalized within fifteen days by means of a letter written in the form of Annex II of this Policy, sent as an attachment to the Ethics Channel system of the Company, or in its unavailability, sent

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directly to one of the members of the Company's Ethics Committee.

- 4.1.8.2 If it isn't possible to refuse and/or return, the Gift, Entertainment or Hospitality must be reported in the Company's Ethics Channel system, or in case of unavailability, directly to one of the members of the Company's Ethics Committee, to that appropriate treatment be given to the matter. Finally, a notification must be issued to the entity responsible for the Gift, Present, Entertainment or Hospitality, in order to inform them that it isn't possible to receive it, as well as reporting that the Company will allocate it appropriately, as set out in this policy.
- 4.1.9 If any Company Employee is unsure of the correct attitude to adopt in a given situation related to the content of this Policy, they must contact the Company's Ethics Channel, or if unavailable, any member of the Ethics Committee for the appropriate guidance.
- 4.1.10 Any and all interactions between Employees and Public Agents and/or Government Authorities must be carried out in accordance with the rules set out in the Company's Anti-Bribery and Anti-Corruption Policy .

## **4.2 Rules for grant, offer or promise**

### **4.2.1 Gifts:**

- 4.1.1.1. The granting, offering or promise of a Gift to a person, whether a Public Agent or not, does not require prior authorization, as long as the concept of Gift, the general guidelines of this Policy and the rule of habituality provided for in Clause 4.1.5 above are observed. .

### **4.1.2. Present, entertainment and hospitality:**

#### **4.1.2.1. If the recipient is not a Public Agent or Close Member of a Public Agent:**

- 4.1.2.1.1. Every Company Employee must obtain authorization, express or in writing, from the Company's Executive Director responsible for their respective area of activity before promising, offering or granting any Gift, Entertainment or Hospitality that exceeds the value of a minimum wage in effect at the time. a person, even if they are not a Public Agent or Close Member of a Public Agent.

- 4.1.2.1.2. Members of the Company's Statutory Board and Board of Directors will not be subject to the authorization referred to in Clause 4.2.2.1.1 above nor to reporting. Members of the Executive Board (non-statutory) will not be subject to authorization, but must, within fifteen days, report the fact to the Ethics Committee if the promise, offer or concession of Gift, Entertainment or Hospitality exceeds the value of a salary minimum in force at the time.

#### **4.1.2.2. If the recipient is a Public Agent or Close Member of a Public Agent:**

- 4.1.2.2.1. Any and all concessions, offers or promises of a Gift, Entertainment or Hospitality to a Public Agent or Close Member of a Public Agent must be previously authorized through a communication in the Company's Ethics Channel system, or in its unavailability, directly by the Ethics Committee of the Company.

- 4.1.2.2.1.1. Members of the Company's Statutory Board and Board of Directors will not be subject to the

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authorization referred to in Clause 4.2.2.2.1 above, but will need to report to the Audit Committee if the amount exceeds the minimum wage in force at the time. The members of the Executive Board (non-statutory) will not be subject to authorization, but must, within fifteen days, report the fact to the Ethics Committee if the amount exceeds the minimum wage in force at the time.

4.1.2.2.2. The granting, offering or promise of Gifts, Entertainment or Hospitality to a Public Agent or Close Member of a Public Agent who has the function of standardizing, regulating, supervising and/or providing jurisdiction over the Company's activities is prohibited.

4.1.3. **Meals:**

4.1.3.1. Regardless of the parties involved, in general, meals must be of moderate value, compatible with the people involved and/or the context in which they are held, so that the act is not capable of inappropriately influencing any commercial decision that affects the Company or that may result in an Undue Advantage for the Company or any other person.

4.1.3.2. In cases where the recipient is a Public Agent or Close Member of a Public Agent, the meal eaten with such person must be reported by the Employee, within fifteen days, to the Company's Ethics Channel system, or in its unavailability, directly to a member of the Company's Ethics Committee.

4.1.3.3. It is prohibited to grant, offer or promise meals to a Public Agent or Close Member of a Public Agent who has the function of standardizing, regulating, supervising and/or providing jurisdiction over the Company's activities; with the exception of meals served in the cafeterias of their units, with the usual menu.

### 4.3 Rules for receiving

4.1.4. **Giveaways:**

4.1.4.1. The receipt of a Gift by an Employee does not require prior authorization from the Company, as long as the general guidelines of this Policy and the habituality rule provided for in Clause 4.1.5 above are observed.

4.1.5. **Gifts, entertainment and hospitality:**

4.1.5.1. **If the offeror is not a Public Agent or Close Member of a Public Agent:**

4.1.5.1.1. Every Company Employee must obtain express or written authorization from the Company's Executive Director responsible for their respective area of activity before receiving any Gift, Entertainment or Hospitality that exceeds the value of a minimum wage in force at the time, when provided by a person other than be a Public Agent or a Close Member of a Public Agent and which may characterize a situation of potential conflict of interest.

4.1.5.1.2. Members of the Company's Statutory Board and Board of Directors will not be subject to the authorizations referred to in Clause 4.3.2.1.1 above nor to reporting. The members of the Non-Statutory Board will not be subject to authorizations, but must report the fact to the Ethics Committee, if the Gift, Entertainment or Hospitality exceeds the value of a minimum wage in force at the time.

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**4.1.5.2. If the offeror is a Public Agent or Close Member of a Public Agent:**

4.1.5.2.1. Regardless of the value, any Gift, Entertainment or Hospitality offered by a Public Agent or Close Member of a Public Agent must be refused and/or returned by the Company's Employee and the fact must be immediately reported to the Company's Ethics Channel system, or in its unavailability, directly to a member of the Company's Ethics Committee.

4.1.5.2.2. If it isn't possible to refuse and/or return, the Gift, Entertainment or Hospitality must be reported to the Company's Ethics Channel system, or if unavailable, directly to a member of the Company's Ethics Committee, so that it can be given appropriate treatment to the matter.

4.1.5.2.3. The members of the Statutory Board and the Board of Directors are exempt from reporting the refusal.

**4.1.6. Meals:**

4.1.6.1. Regardless of the parties involved, in general, meals must be of moderate value, compatible with the people involved and/or the context in which they are held, so that the act is not capable of inappropriately influencing any commercial decision that affects the Company or that may result in conflicts of interest or an Undue Advantage for the Company or any other person.

4.1.6.2. In cases where the offeror is a Public Agent or Close Member of a Public Agent, the meal eaten with such person must be reported by the Employee to the Company's Ethics Channel system, or in its unavailability, directly to a member of the Ethics Committee of the Company.

## **4.4 Specific Guidelines**

4.4.1 The following additional rules must be observed when granting, offering or promising Gifts, Entertainment and/or Hospitality on behalf of the Company, whether or not the recipient is a Public Agent or Close Member of a Public Agent:

- (i) It is prohibited to grant, offer, promise or receive Gifts in cash or equivalent (eg vouchers or gift certificates);
- (ii) Whenever possible, Gifts must: (a) contain the Company's logo, so that they are intended to promote the M. DIAS BRANCO brand; (b) have low or irrelevant resale value in the market; (c) be intended for professional and non-personal use; and (d) be intended for a legal entity (eg company, body, entities, etc.) and not for a specific individual;
- (iii) The purpose of the Entertainment must be to provide legitimate commercial opportunities and discussions, so the person responsible for providing the Entertainment must be present at the event/activity involved or appoint a representative to attend in their place representing the Company.

## **4.5 Responsibilities**

4.1.7. The Ethics Committee is responsible for:

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- a) Recommend the destination of Gifts, Presents, Entertainment or Hospitality received by Employees that do not comply with the guidelines set out in this Policy and that are not subject to refusal and/or return.
- b) Provide appropriate treatment to concessions or receipt of gifts or hospitality outside the limits established in this Policy.
- c) Clarify any doubts of Employees regarding the concession, offer, promise and/or receipt of Gifts, Presents, Entertainment and Hospitality.
- d) Approve the granting, offering, promise and/or receipt of Gifts, Presents, Entertainment and Hospitality, under the terms set out in this Policy.
- e) Keep a record of communications received regarding interactions between Employees and Public Agents.
- f) Report to the Audit Committee any relevant situation of risk or non-compliance with this Policy, recommending disciplinary measures and possible control improvements.

**4.1.8. The Audit Committee is responsible for:**

- a) Provide appropriate treatment to concessions or receipt of gifts or hospitality outside the limits established in this Policy.
- b) Clarify any doubts of Employees regarding the concession, offer, promise and/or receipt of Gifts, Presents, Entertainment and Hospitality.
- c) Approve the granting, offering, promise and/or receipt of Gifts, Presents, Entertainment and Hospitality, under the terms set out in this Policy.
- d) Report to the Board of Directors any relevant situation of risk or non-compliance with this Policy, recommending disciplinary measures and possible control improvements.

**4.1.9. The Boards (statutory or not) responsible are responsible for:**

- a) Disseminate and apply this Policy in their respective areas,
- b) Provide appropriate treatment to concessions or receipt of gifts or hospitality outside the limits established in this Policy.
- c) Clarify any doubts of Employees regarding the concession, offer, promise and/or receipt of Gifts, Presents, Entertainment and Hospitality.
- d) Approve the granting, offering, promise and/or receipt of Gifts, Presents, Entertainment and Hospitality, under the terms set out in this Policy.
- e) Report to the Audit Committee or Ethics Committee, in accordance with the expected governance, any and all risk situations under the terms set out in this Policy.

**4.1.10. The Board of Directors is responsible for:**

- a) Approve any changes and revisions to this Policy.
- b) Regulate the cases omitted from this Policy.
- c) Process non-compliance with the obligations and rules established in this Policy and deliberate on it, resulting in disciplinary measures and control improvement actions, as applicable.

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## 4.6 Policy Violation

4.1.11. Failure to comply with this Policy will subject the offender to disciplinary sanctions, in accordance with the Company's internal rules (for example, the Company's Code of Ethics), without prejudice to applicable administrative, civil and criminal sanctions, attributable by the competent authorities.

## 5 GLOSSARY

5.1 The terms and expressions listed below, when used in this Policy, in the singular or plural will have the following meaning:

**“Public Agent”** - Any natural person, civil servant or not, of any level or hierarchy, who exercises, even if temporarily or without remuneration, by 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 service provider contracted or contracted to carry out activities typical of the Public Administration, as well as any leader of a political party, their employees or other people who act for or on behalf of a political party or candidate for office public. A Public Agent will be considered to be anyone who is part of this definition, whether national, foreign or who holds a position, job or function in international public bodies or organizations.

**“Governmental Authority”** - Every organ, department or entity of the direct or indirect administration of any of the powers of the Union, the States, the Federal District or the Municipalities, legal entity incorporated into public assets or entity for the creation or funding of which the treasury has contributed or competes with more than fifty percent of the assets or annual revenue, or over which the State or Government can, directly or indirectly, exercise a dominant influence (by holding the majority of subscribed capital, controlling the majority of votes or by having the right to appoint the majority of members of the administration, management body or supervisory board); as well as bodies, state entities or diplomatic representations of a foreign country, as well as bodies, entities and people controlled, directly or indirectly, by the public authorities of a foreign country, international public bodies or organizations, including sovereign wealth funds or an entity whose property is a fund sovereign.

**“Gift”** - Item with no commercial value or with a market reference value of up to a minimum wage in force at the time of grant, distributed or received as a courtesy, advertising, customary publicity or on the occasion of events or commemorative dates of a historical or cultural nature, that is of a general nature and, therefore, is not intended to exclusively reward one person and that contains the logo of M. DIAS BRANCO or the legal entity that granted the gift to the M. DIAS BRANCO Employee, such as diaries, calendars, keychains, flash drives, pens, among others.

**“Collaborators”** - All employees, Directors (statutory or not), members of the Board of Directors, members of committees (statutory or not), members of the Supervisory Board, apprentices and interns of the Company, regardless of their position or function.

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

**“Entertainment”** - Activities or events whose main purpose is to provide leisure to their participants, such as parties, artistic shows, plays, sporting events, celebratory or formal meals, among others.

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**“Hospitality”** - Travel (air, sea and/or land), accommodation, food and reception, whether or not related to business activities. Hospitalities of an exclusive tourism or leisure nature will be considered as “Gifts” for the purposes of this Policy.

**“Close Member”** - In relation to a person, their spouse or partner, blood or related, in a direct line (ascendant or descendant) or collateral, up to the second degree of kinship.

**“Gift”** - Objects or services, for personal use or consumption, that have commercial value and that do not fall within the definition of Gifts. Hospitalities of an exclusive tourism or leisure nature will also be considered “Gifts”.

**“Third Parties”** - Any natural or legal person who is not an Employee of the Company or who is hired to assist in the performance of its activities, such as partners, consortium members, representatives, suppliers, service providers in general, consultants, outsourced workers, agents or third parties who act on behalf of the Company.

**“Undue Advantage”** - Any goods or benefits, tangible or intangible, including money and valuables, offered, promised or delivered with the aim of influencing or rewarding any act or decision of a Public Agent or Third Party.

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## ATTACHMENTS

### Annex I

#### FORM FOR GRANTING, OFFERING, PROMISING OR RECEIVING GIFTS, ENTERTAINMENT AND/OR HOSPITALITIES

**Instructions:** This form must be completed in the case of granting, offering, promising or receiving Gifts, Entertainment and/or Hospitality. After completion, this form must be forwarded to the competent Executive Board for due approval, under the terms set out in the Policy.

|  |            |
|--|------------|
| Collaborator Name:   |            |
| Office:  | Direction: |
| Value of the asset (if it isn't possible to determine, provide an estimate):   |            |
| Detailed description of the Gift, Entertainment and/or Hospitality (in case of concession, attach proof/receipt of payment). |            |
| Identify whether the Gift, Entertainment and/or Hospitality was given or received:   |            |
| Name of the third party/Public Agent offering/recipient:   |            |
| Company/Government Authority:  | Office:    |
| Approval/Deliberation by the competent Board (field for exclusive use by the competent Board):                               |            |

[location], [date]

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**POLICY**  
**GIFTS, PRESENTS, ENTERTAINMENT AND**  
**HOSPITALITIES M. DIAS BRANCO S/A**  
**INDÚSTRIA E COMÉRCIO DE ALIMENTOS**

**MDB.CPL.PL.I.0002-R1**

[Insert declarant's name and signature]

\_\_\_\_\_  
[Insert name and title of approver]

## Annex II

### LETTER OF REFUSAL OF GIFTS, GIFTS, ENTERTAINMENTS AND HOSPITALITIES

Dear [ insert offeror's name ],

It is with great appreciation that I, [ insert Employee's name ], as [ insert Employee's position ] at M. Dias Branco S/A Indústria e Comércio de Alimentos ("Company"), thank you for [ insert description of the Gift ], Gift, Entertainment or Hospitality ] received on the date of [ insert date of receipt ].

However, such [ insert description of the Gift, Present, Entertainment or Hospitality ] it is in disagreement with the Company's internal policies. Therefore, in order to maintain our good business relationship and comply with the Company's internal policies, I am returning the [ insert description of the Gift, Present, Entertainment or Hospitality ] informed above.

Thank you in advance for your understanding.

Sincerely,

\_\_\_\_\_  
[ location ], [ date ]

\_\_\_\_\_  
[ insert Collaborator's name and signature ]

## 5. CHANGE HISTORY

| Revision | Latest Changes   |
|----------|--|
| 1        | Template adjustment, hierarchy update (replacement of the Audit, Risks and Compliance, Legal Department) and updating the nomenclature of the Anti-Corruption Policy to the Anti-Bribery and Anti-Corruption Policy. |

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