

## 1. OBJECTIVE

- 1.1** This document, which is an integral part of the M. Dias Branco Code of Ethics, aims to establish the rules, guidelines and methods to be observed by the Company when applying disciplinary measures to actions and conduct that do not comply with the Company's Code of Ethics. , the Integrity Program and other internal and legal standards. In addition to disciplinary measures, the Company encourages and recognizes its Employees and Third Parties regarding the engagement and dissemination of a culture of ethics and integrity, as well as good practices and other programs aimed at sustainability in its operations.
- 1.2** This document must be disclosed to all Company Employees and Third Parties, together with the Company's Code of Ethics, and its knowledge is mandatory for everyone.

## 2. APPLICATION

- 2.1** The rules established in this document apply to the Company, its subsidiaries 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 the guidelines set out in this document.

## 3. RESPONSIBLE MANAGERS

Legal, Governance, Risks and Compliance Vice-presidency

Audit Committee;

Administrative Council.

## 4. DESCRIPTION

### 4.1. General Guidelines

- 4.1.1.** Violations of the Code of Ethics, the Integrity Program and/or other internal policies or procedures and applicable laws will not be tolerated and may be subject to internal investigation, in accordance with the Protocol for Internal Investigation and Operation of the Company's Ethical Channel, and application of the disciplinary measures provided for in Clause 4.2. below, observing the protections afforded by current labor legislation and the proportionality between the severity of the conduct and the degree of the sanction.
- 4.1.2.** The application of any disciplinary measure must be carried out immediately whenever possible, without allowing excessive time to elapse between the punishable fact being duly established and the moment the penalty is applied. A longer period of time is allowed for the application of a penalty when the passive lack of punishment requires the investigation of facts and responsibilities through an internal investigation.

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- 4.1.3. Disciplinary measures will be recommended by the bodies receiving the internal investigation report (even if this is not necessary), in accordance with the competencies set out in the Protocol for Internal Investigation and Operation of the Company's Ethical Channel, based on criteria such as the nature and severity of the act committed ( whether resulting from the offender's action or omission), the position held and the history of the person involved, the circumstances of the misconduct, the offender's intention, recurrence, among others. It will be up to the manager of the Employee or Third Party involved in the infraction to decide on the application of the recommended measure.
- 4.1.3.1. Regardless of the measures to be defined, the Company may adopt provisional and urgent actions necessary to interrupt, remedy and/or mitigate detected irregularities or infractions, as well as to investigate the facts and preserve evidence (for example, temporary removals, temporary suspensions, suspension payments or contracts, etc.).
- 4.1.4. Observing the guidelines set out in the Protocol for Internal Investigation and Operation of the Company's Ethical Channel, disrespect for the Company's internal policies and standards by an Employee or Third Party, if they indicate signs of any civil, administrative or criminal offense, may be taken to the regulatory bodies and the competent Government Authorities so that the appropriate measures are adopted, without prejudice to the application of sanctions by the Company, under the terms set out here.
- 4.1.4.1. Any and all cooperation decisions with Government Authorities must be previously approved by the Company's Board of Directors, which will determine the procedure to be adopted and those responsible for handling the matter.
- 4.1.5. In addition to the guidelines provided for in this document, the actions to be carried out by the Ethics Committee (or the Board of Directors, as applicable) will follow the guidelines of the procedures established in its internal regulations, as well as in the Internal Investigation and Operation Protocol of the Company Ethical Channel.

## 4.2. Disciplinary measures

- 4.2.1. Violations of the Code of Ethics, the Integrity Program and/or other internal policies or procedures and applicable laws will be subject to the following disciplinary measures:
- (i) **Verbal warning** - The Employee must be verbally warned by the responsible manager in a respectful manner and in an appropriate place, without suffering any type of exposure and/or unnecessary embarrassment, and the reason for being warned must be made very clear;
  - (ii) **Written warning** - The Employee must be formally warned by the responsible manager in a respectful and private manner, without suffering any type of exposure and/or unnecessary embarrassment, and must sign a specific warning form to be issued by the Human Resources area, containing the exposure of reasons for applying the measure;
  - (iii) **Suspension** - The Employee must be removed from their activities for a specified period, which may be 1 (one) or 5 (five) days. The Employee must be communicated in a respectful and private manner, without suffering any type of exposure and/or unnecessary embarrassment, and must sign a specific suspension form to be issued by the Human Resources area, containing the reasons for applying the measure;

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- (iv) **Dismissal without just cause** - The Employee is dismissed by the employer in a respectful and private manner, through a termination letter, with due payment of all applicable severance pay. This measure must be applied when there are not enough elements to justify a dismissal for just cause;
- (v) **Dismissal for just cause** - The Employee is dismissed by the employer in a respectful and private manner, through a termination letter stating the reasons for adopting said measure, in accordance with applicable labor legislation. It is worth noting that, regardless of the degree of the infraction committed, dismissal for just cause can only be adopted if all the requirements set out in current labor legislation are met; and
- (vi) **Application of penalty provided for in the contract and/or contractual termination (in the case of a contracted Third Party)** - The Third Party suffers the penalty provided for in the contract, in case of non-compliance with the Company's internal policies. The contract signed with a Third Party must be terminated, depending on the severity of the infraction.

- 4.2.1.1. In addition to the measures above, Employees (and/or Third Parties, as applicable) may be subject to personal liability, including possible compensation for damages caused by their conduct.
- 4.2.1.2. Without prejudice to the disciplinary measures mentioned above, other measures of an educational and/or preventive nature may be applied, such as: training, changes in processes, establishment of additional controls, changes to systems or IT tools, etc.
- 4.2.2. Prior to proposing a disciplinary measure, the investigation coordinating body provided for in the Protocol for Internal Investigation and Operation of the Ethical Channel, must involve the Departments of the Legal and Human Resources areas, in order to obtain a technical analysis regarding the proportionality and legality of the measures to be proposed.
- 4.2.3. The Compliance area must continuously monitor the adoption of corrective measures established by the competent body, monitoring compliance.
- 4.2.4. Other disciplinary measures arising from common situations, such as unjustified absence, insubordination, indiscipline, etc., which do not constitute an obligation to report to the Ethics Channel, may be applied directly by the immediate manager.

### 4.3. Responsibilities

#### 4.3.1. The Legal, Governance, Risks and Compliance Vice-Presidency is responsible for:

- a) Provide support to the Board of Directors, in case of cooperation with Government Authorities.

#### 4.3.2. The Compliance area is responsible for:

- a) Clarify any doubts regarding the application of the guidelines set out in this document.
- b) Carry out continuous monitoring of the adoption of corrective measures established by the competent body, monitoring compliance.

#### 4.3.3. The Legal and Human Resources areas are responsible for:

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- a) Provide support to the competent bodies by coordinating the investigation into the application of disciplinary measures.

4.3.4. **The Ethics Committee is responsible for:**

- a) Process non-compliance with the obligations and rules established in this document and deliberate on it, as applicable.

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

- a) Approve any changes and revisions to this document.  
b) Regulate the cases omitted from this document.  
c) Approve all cooperation decisions with Government Authorities.  
d) Process non-compliance with the obligations and rules established in this document and deliberate on it, as applicable.

## 4.4. Policy Violation

- 4.4.1. 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:

**“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.

**“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.

**“Integrity Program” or “Compliance Program”** - Means the Company's Code of Ethics, the Ethical Channel, the Anti-Bribery and Anti-Corruption Policy and other internal policies and procedures, as well as the set of measures established, from time to time, with the aim of ensuring integrity in its activities and complying with the requirements of the Anti-Corruption Law and related legislation.

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**“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 intermediaries who act on behalf of the Company.

## 6. CHANGE HISTORY

Revision	Latest Changes
1	Template adjustment.

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