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BRF TAX POLICY

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In accordance with Paragraph 16(2), Schedule 19, Finance Act 2016, BRF sets out below its group tax policy for all UK companies within BRF. This policy applies from the date of publication until it is superseded.

Scope

BRF is one of the largest producers of fresh and frozen protein foods in the world, with a portfolio of over five thousand stock keeping units ("SKUs"). Our processed products include marinated and frozen chicken, Chester® rooster and turkey meat, specialty meats, frozen processed foods, frozen prepared entrees, portioned products and sliced products. We also sell margarine, sweet specialties, sandwiches, mayonnaise, and animal feed.

BRF believes that needs to go beyond compliance with tax laws in the countries where it operates, developing constructive and lasting relationships with local entities, cooperating for the continuous

improvement of the taxation systems in the places where operates, always in-line with our policies of integrity and anti-corruption.

Our tax policy and objective are to comply across all direct and indirect taxes, as a company and employer, with all applicable tax laws and obligations in all countries where we operate, as well as with international treaties and international tax guidelines.

The management of our tax obligations occurs in an integrated manner to BRF's business strategy, resulting in factors that impact the cost of serving our clients in each location, including consumption preferences, logistics, availability of inputs, financing conditions among others. Our goal is to help the company to offer our products with high quality, at a competitive price and accessible to consumers.



Risk Management and Governance Arrangements

BRF has high governance standards and tax risks and strategies must be approved by a tax committee formed by tax, financial and controllership directors and will be submitted to the board if relevant either to the companies' financials or to its interactions with stakeholders.

We are committed to compliance with tax law and practice in the UK. We seek to comply with our tax filing, tax reporting and tax payment obligations in the UK; to ensure that the right amount of tax is paid at the right time. It involves disclosing all

relevant facts and circumstances to the tax authorities and claiming reliefs and incentives where available.

support the UK in complying with its tax strategy.

The approach of the group towards its dealings with HMRC

We engage openly and constructively



Attitude of the group to tax planning (so far as affecting UK taxation)

BRF will not engage in tax planning other than that which is permitted by law and which supports genuine commercial aims.

We are committed to being a responsible and compliant taxpayer in the countries where we operate. When entering into commercial transactions, BRF seeks to take advantage of available tax incentives, reliefs and exemptions in line with, and in the spirit of, tax legislation.

The level of risk in relation to UK taxation that the group is prepared to accept

BRF manages risks to ensure compliance with legal requirements in a manner which ensures payment of the right amount of tax. We regularly seek professional opinions and advice from independent external advisors on tax matters; on areas of complexity or uncertainty to

with tax authorities on matters relating to our tax affairs. Where necessary we will seek formal or informal clearance from tax authorities on uncertain tax positions insofar as they relate to our tax affairs.