



***Política Corporativa de Prevenção à Lavagem de Dinheiro e ao Financiamento ao Terrorismo / Anti-Money Laundering and Counter Terrorism Financing***  
**Corporate Policy**

***Versão Inglês / English Version***

**1 OBJECTIVE**

Establish guidelines regarding procedures related to the fight against and prevention of Money Laundering and Financing of Terrorism to be adopted by the Employees of BRF S.A. and its subsidiaries, in any country (“BRF” or the “Company”), and other professionals who act in the name of or for the benefit of the Company, respecting the other internal rules of BRF, as well as Brazilian and international laws, ensuring a transparent and ethical environment.

For the purposes of this Policy, underlined terms and variations thereof shall have the meanings ascribed to them in the Glossary.

**2 APPLICABILITY**

This Policy applies to all Employees as well as any Third Party located in Brazil or any other country (together, the “Persons”). Every Third Party must assure that acts performed on behalf of BRF or relating to the provision of services, supply of materials, or procurement of BRF products meet the same integrity standards as those expected of BRF Employees.

**3 ROLES AND RESPONSIBILITIES**

**3.1 COMPLIANCE DEPARTMENT**

- a) Clarify questions related to this Policy,
- b) Establish procedures necessary for its implementation;
- c) Disseminate, including through training, the rules contained herein;
- d) Evaluate High Risk Engagements based on information obtained during the Reputational Analysis;
- e) Receive reports on the situations listed in items 4.2 and 4.3 of this Policy, for review and action; and
- f) Keep this Policy updated.



### **3.2 COMMERCIAL BOARD AND DIRECT AND INDIRECT PROCUREMENT DIRECTORSHIP**

a) Adopt best practices with respect to "Know Your Customer" and "Know Your Supplier," as per items 4.4 and 4.5 of this Policy, and also report to the Compliance Board activities deemed suspicious.

### **3.3 RISKS DEPARTMENT**

a) Identify, review, and monitor risks relating to Money Laundering and Financing of Terrorism.

### **3.4 EMPLOYEES AND THIRD PARTIES**

a) Know, respect, and disseminate the guidelines set forth in this Policy, as well as participate in the training sessions to which they are summoned and report to the Transparency Channel or the Compliance Board any suspected violation of Applicable Laws and Regulations, the Transparency Manual, this Policy, or other BRF policies.

## **4 GUIDELINES**

BRF repudiates any criminal activity and acts in such a manner as to ensure that its operations are not used for Money Laundering or Financing of Terrorism.

All Employees must be committed to the risk mitigation mechanisms and procedures involved in asset operations and managing processes in order to prevent the commission of Money Laundering and Financing of Terrorism crimes.

The Company must keep its books and records duly completed and up to date in order to accurately reflect all transactions and prepare financial statements in accordance with accounting principles and standards.

If indications of activities or organizations suspected of Money Laundering or Financing of Terrorism are identified, BRF should inform the competent authorities in the applicable jurisdictions.

No BRF activities may be conducted for the commission of any crimes, especially Financing of Terrorism and Money Laundering.



In order to assist in this regard, Employees in the Commercial, Procurement, Compliance, and Financial areas should be trained to identify indications of suspicious financial activities or organizations.

#### **4.1 MONEY LAUNDERING**

Money Laundering is the commission of criminal activities aimed at transforming proceeds from illegal activities into proceeds of an apparently legal origin by concealing or disguising the nature, origin, location, disposition, movement, or ownership of property, rights, or valuables derived from, directly or indirectly, a criminal offense.

The process of Money Laundering may involve three phases.

**a) Placement:** Consists of the illicit funds entering the economic system. To this end, the most varied of transactions are performed, such as deposits in bank accounts, possibly in small amounts and held by third parties; conversion of foreign currency; purchase of financial products and services; investment in savings and/or investment funds; purchase of assets such as real estate, gold, gems, and artwork, among others.

**b) Concealment:** Consists in the execution of multiple financial transactions aiming at the concealment of illegal funds, in order to separate the valuables from their illicit origin. This phase takes place through large and complex transactions in order to make it difficult to track, monitor, and identify the illegal source of the money. At this stage, it is common to make bank transfers between accounts located in different countries, and the destination is often countries considered to be Tax Havens.

**c) Integration:** Consists of the formal incorporation of funds into the economic system through investment in the capital, finance, real estate, or artwork markets, among others. At this stage, assets of a criminal origin are already mixed with valuables obtained legitimately, being used in lawful or unlawful business, whether performing legitimate transactions or feigned transactions, such as false imports/exports, purchase and sale of real estate at prices different from market prices, return loans, etc.

The description of the three steps above demonstrates that Money Laundering can be done in many different ways. By way of example, it is worth mentioning some of the sectors of economic activity most used in the commission of this crime:

- Financial institutions;
- Insurance, capitalization, and pension companies;
- Stock market;
- Real estate market;
- Art market;
- Cattle-raising activities;
- Non-profit organizations;
- Service companies.



## **4.2 INDICATORS OF MONEY LAUNDERING AND FINANCING OF TERRORISM**

Given the wide variety of artifices that may be used for the commission of illicit acts, it is important that all Employees be aware of transactions with the characteristics listed below (exemplary list), which may present indications of Money Laundering and Financing of Terrorism:

- a) Proposals or transactions at prices incompatible with the social and economic profile, financial capacity, or professional occupation of the beneficiary, Third Parties, and/or related parties;
- b) Receipt or payment of amounts in checking accounts with ownership different from that of the company, legal representatives, or professionals involved in the engagement;
- c) Payment or receipt of funds, without proof of delivery of the object or service purchased;
- d) Intentionally incorrect accounting entry to hide or disguise the actual origin of or justification for the transaction;
- e) Operations and Transactions on behalf of third parties to conceal the actual final beneficiary;
- f) Operations or Transactions conducted for the purpose of generating losses or gains without there being an economic basis;
- g) Operations or Transactions conducted with the participation of individuals or entities incorporated in countries that do not or insufficiently apply the recommendations of the Financial Action Task Force against Money Laundering and Financing of Terrorism – FATF;
- h) Private transfers of funds and securities without justification or formalization of contractual instrument;
- i) Operations or transactions where it is not possible to identify those involved and/or the final beneficiary;
- j) Operations or transactions whose degree of complexity and risk are incompatible with the technical qualifications of the Third Party or its representative;
- k) Declaration of various bank accounts and/or modification them habitually;
- l) Performance of various foreign exchange transactions for no apparent reason, especially if previously there was little or no activity in the account;



- m) Appointment of an attorney-in-fact who does not have an apparent link with the grantor;
- n) Offering resistance in providing information, or providing incorrect information regarding identification or the transaction; and
- o) Change of business owner or asset immediately prior to a claim.

If any of the situations described above or suspected illegal practices are found, the Employee must report them immediately to the Compliance Department for appropriate action.

#### **4.3 REPORTING TO THE COMPETENT BODIES**

Every transaction that may constitute indications of the occurrence of Money Laundering and/or Financing of Terrorism, including but not limited to those described in item 4.2 above, must be reported immediately to the Compliance Department through the Transparency Channel for review and due diligence.

In the event of a communication, all records that support this decision must be preserved and properly archived. The processes of recording, reviewing, and reporting to the competent authorities financial transactions with indications of Money Laundering and Financing of Terrorism shall be carried out in a confidential manner by the Compliance Department, including in relation to those involved.

#### **4.4 KNOW YOUR SUPPLIER**

BRF adopts criteria for hiring Third Parties, with a focus on preventing and combatting Money Laundering, Financing of Terrorism, and Corruption, which are provided for in the Continuous Third-Party Reputational Analysis Corporate Norm.

Any engagement classified by the Compliance Department as High-Risk Engagements may only have their contract formalized after conducting the Reputational Analysis. High Risk Engagements are considered to be those listed in the Continuous Third-Party Reputational Analysis Corporate Norm.

In the Reputational Analysis, any violations of the laws and rules in force and/or the guidelines contained in the Transparency Manual and/or other BRF Policies are checked; Any conflict of interest situations, facts that may damage BRF's reputation, among other information.

The Compliance Department, based on all information obtained during the Reputational Analysis, shall evaluate and classify the degree of risk linked to the engagement, as per



situations described in item 6.5.1 of the Continuous Third-Party Reputational Analysis Corporate Norm, and shall recommend the engagement or whether or not to maintain the Third Party, from the perspective of Compliance, Anti-Corruption, and Anti-Fraud.

#### **4.5 KNOW YOUR CLIENT**

Knowing the client is one of the key practices for the Company to conduct sound and secure business and financial activities. Adequate knowledge of clients minimizes capital inflows into the Company originating from illicit activities.

To this end, in addition to maintaining proper records on clients, Employees should be aware of any indications of suspicious transactions mentioned in section 4.2 of this Policy, as well as other suspicious circumstances that they may find based on the Training received.

#### **4.6 KNOW YOUR PARTNER**

BRF conducts due diligence into Third Parties with whom it is considering a merger, acquisition, sale of a business unit, joint venture, or partnership in order to confirm that the Third Party has a history of integrity and has not been or is not currently engaged in illicit practices such as Money Laundering and/or Financing of Terrorism.

#### **4.7 BRAZILIAN AND INTERNATIONAL ECONOMIC SANCTIONS**

The Third Parties identified on the OFAC (Office of Foreign Assets Control) list, on the sanctions list of the United Nations Security Council, the European Union, or the Brazilian Ministry of Justice shall be considered High Risk and shall be reviewed by the Compliance Board, which shall take appropriate action, on a case-by-case basis.

#### **4.8 RISK, EVALUATION AND MITIGATION**

BRF has a formally established risk management process in which the risks of corruption and other unlawful or unethical practices are considered. The identification and analysis of potential events that may affect the Company takes into account the likelihood of materialization and the impact of these events and, in the case of risks associated with Money Laundering and Financing of Terrorism, the main sources of threat and possible vulnerabilities of the business. For all business risks identified, mitigation actions are defined, which are now monitored and reported by the Risks Department.



#### **4.9 NOM-COMPLIANCE OF THIS POLICY**

The persons for whom this Policy is intended are advised that breach hereof, as well as breach of applicable laws and regulations and other BRF policies, such as the BRF Transparency Manual, may be subject to internal disciplinary procedures as per a Consequence Norm, without prejudice to any applicable legal measures.

Any omissions or exceptions to this Policy shall be reported and resolved on by the Compliance Department and/or the BRF Transparency Committee, as appropriate.

In addition, seeking to uphold the Company's ethical standards and monitor business relationships with Third Parties, as well as assist in the prevention and detection of all forms of Corruption, BRF supports and encourages the Persons to report any practices that may represent a violation or potential violation of the aforementioned standards.

Complaints should be submitted to the Transparency Channel, the information of which is on its institutional website and on the intranet.

It is possible to submit complaints via telephone, website, or e-mail. In countries where laws and regulations so permit, anonymous complaints are also possible.

When submitting a report, complainants should submit as much detail as they are aware of in order to assist in the investigation.

BRF strongly condemns any form of retaliation against whistleblowers who have filed a complaint in good faith and with responsibility, even if their complaint proves to be unfounded, as set forth in the Corporate Policy of Reporting to the Transparency Channel.

BRF, through the Compliance Department, undertakes to investigate complaints received independently, cautiously, and responsibly, in a fair and impartial manner, and to take appropriate disciplinary and/or legal action, when necessary.

#### **5 REFERENCE DOCUMENTS**

- CE 01.1.100 – *Manual de Transparência BRF / BRF Transparency Manual.*
- CP 28.1.002 – *Política Corporativa de Denúncias ao Canal de Transparência / Corporate Policy of Reporting to the Transparency Channel.*
- CP 28.1.003 – *Política Corporativa Antissuborno e Anticorrupção / Anti-Bribery and Anti-Corruption Corporate Policy.*



- CN 28.3.001- *Análise Reputacional Contínua de Terceiros* (Continuous Third-Party Reputational Analysis Corporate Norm).
- Federal Law No. 7,492/1986, known as the White-Collar Law, which defines crimes against the Brazilian financial system.
- Federal Law No. 9,613/1998, known as the Money Laundering Law and sets forth provisions regarding the crime of Money Laundering.
- Federal Law No. 12,846/2013, known as the Anti-Corruption Law and sets forth provisions regarding the administrative and civil liability of legal entities for the commission of acts against the public administration.
- Circular Letter of the Central Bank of Brazil No. 3,542/2012, which discloses a list of transactions and situations that may constitute indications of the occurrence of the crimes provided for in the Money Laundering Law, so that they may be reported to the UIF.

## **6 FINAL PROVISIONS**

This document is valid as from the date of its issue and shall be modified at any time and discretion.

Individuals violating these rules will be subject to the legal/disciplinary applicable measures, to be determined by the BRF competent administrators.

It will be incumbent upon the editor area to clarify any possible doubts, establish the procedures required for implementation, checking and dissemination of the rules mentioned in this document.

## **7 APPROVALS**

<b>RESPONSIBLE</b>	<b>AREA/DEPARTMENT</b>
<b>DRAFTING</b>	Global Compliance Department
<b>APPROVAL</b>	Transparency Committee

## **GLOSSARY**

**BRF or the Company:** Refers to BRF S.A., as well as all of its subsidiaries, in Brazil or other countries.





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**Corruption:** BRF, based on applicable laws and regulations, conceptualizes Corruption as:

- Promising, offering, or giving, directly or indirectly, undue advantage to a Public Agent, or to Persons Linked to Public Agents;
- Financing, funding, sponsoring, or otherwise subsidizing the commission of the illegal acts committed by Public Agents;
- Using any intermediary individual or legal entity to conceal or disguise one's real interests or the identity of the beneficiaries of such acts performed;
- With respect to bids and contracts: (i) frustrate or defraud, by agreement, combination, or otherwise, the competitive nature of public bidding, (ii) prevent, disrupt, or defraud the performance of any act of a public bidding procedure, (iii) removing or trying to remove any bidder, by means of fraud or by offering an advantage of any kind; (iv) defraud a public bid or contract arising therefrom; (v) fraudulently or irregularly create a legal entity to participate in a public bid or enter into an administrative contract, (vi) fraudulently gain an advantage or improperly benefit from modifications or extensions of contracts with the Public Power, without authorization by law, in the public call for bids or in the respective contractual instruments, or (vii) manipulate or defraud the economic and financial balance of contracts with the public administration.
- Hindering any investigation or inspection by public agencies, bodies, or Public Agents, or interfering in their activities, including in the context of regulatory agencies and supervisory entities of the national financial system.

**Employee or Employees:** Are all people employed by BRF who work at all levels of the organization, including managers, senior executives, executives, directors, employees, internal consultants, interns, apprentices, trainees, home workers, part-time workers and workers for a fixed term, and occasional workers.

**Financing of Terrorism:** Consists of the promotion of Terrorism via the allocation of funds to terrorists, terrorist organizations, or terrorist acts.

**High Risk Engagements:** Engagements thus considered by the Compliance Board in view of the circumstances surrounding them.

**Integrity System:** Is the Compliance program implemented at BRF, taking into account the parameters and guidelines contained in Law No. 12,846/13, Decree No. 8,420/15, CGU Ordinance 909/15, CVM Instruction No. 586/2017, and other foreign laws to which BRF is subject, as well as the specificities of the sector of performance, the risks to which company is subject, methodologies, and best market practices.

**Money Laundering:** Consists of the commission of criminal activities aimed at transforming proceeds from illegal activities into proceeds of an apparently legal origin by concealing or disguising (by action or omission) the nature, origin, location,



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disposition, movement, or ownership of property, rights, or valuables derived from, directly or indirectly, a criminal offense.

**Person or Persons:** All BRF Employees and Third Parties.

**Persons Linked to Public Agents (PPEs):** Are the following individuals and legal entities related to the Public Agent:

- a) Their relatives, in a direct line, to the second degree (grandparents, parents, grandchildren), spouse, companion, stepson and stepdaughter;
- b) Their close employees: (i) persons with whom a Public Agent maintains a company or joint ownership or ownership in companies, with or without legal personality, whether they are proxies or have some other close relationship within public knowledge; (ii) persons who hold control of companies or businesses with or without legal personality, known to have been created for the benefit of a Public Agent;

fc Companies in which Public Agents and/or individuals linked with them have a direct or indirect interest, or from which they receive benefits of any kind.

**Public Agent or Politically Exposed Person (PPE):** For the purposes of this Policy, are those who have exercised or exercised in the last 5 years, temporarily or permanently, with or without remuneration, in Brazil or abroad:

- a) by any form of investiture or link, mandate, concession, position, employment, or function in the Public Power, or where they exercise significant influence on decision-making through the law or participation in the Public Power;
- b) political party leaders, as well as political representatives and candidates for public office in the last election (municipal, state, district, and federal);
- c) leaders and representatives of public international organizations, such as the United Nations or the World Trade Organization.

**Public Power:** For the purposes of this Policy, the term Public Power is broadly defined to include, but is not limited to:

- Bodies of the direct, indirect, or foundational administration of any of the Powers of the Federal Government, the States, the Federal District, the Municipalities, a Territory (be it executive, legislative, judicial, or administrative), government-owned companies, government-controlled companies, or public service concessionaires, including instrumentalities, regulatory agencies, customs, public foundations, notary offices, electricity, water, and gas distribution companies, companies with public-private partnership contracts, public schools, public universities, public health facilities, police stations, military entities, local tax offices, issuers of permits, approvals, government licenses, and visas.



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- International public organization or any international department or agency (e.g., United Nations (UN), International Monetary Fund (IMF), World Bank, etc.).

**Reputational Analysis:** Procedure that comprises the realization of reputational research (screening) of Third Parties who wish to relate or already have related with the Company, in order to understand the risk levels which, eventually, may be associated with them.

**Senior Management:** This is the set of Employees who make up the Company's strategic level with the power to establish the policies, objectives, and general direction of its organization.

**Tax Haven:** Are considered Tax Haven the countries with favored taxation or that oppose confidentiality regarding the corporate composition of legal entities. Operations and / or negotiations by Third Parties located in these countries will have particular attention to monitoring by the Compliance Directorship.

**Terrorism:** Use of violence, physical or psychological, through attacks on people, institutions, or establishments in order to inspire fear in direct victims and throughout society, as a form of political, religious, ideological, racial ethical, or any other action of a nature that may be invoked to justify it.

**Third Party or Third parties:** Are all those who provide services to BRF, have a business relationship with the Company, or act on its behalf or for its benefit (with or without power of attorney), such as customers, suppliers, service providers, integrated producers, brokers, and business partners. This concept also includes the members of the Board of Directors and the Audit and Advisory Committees.

**Transparency Channel:** Is an independent channel, managed by a third party and/or the Compliance Department, and allows reports to be sent at any time by the Persons, through the various communication channels available, ensuring anonymity to whistleblowers whenever they wish not to identify themselves.