

Code of Ethics & Conduct



Contents

1. Letter From the President	3 
2. Presentation	4 
3. Preserving the Institutional Image	5 
4. Preserving Information and the Technological Environment	7 
5. Preserving Property and the Work Environment	9 
6. Employee Conduct	11 
7. Conflict Of Interest	14 
8. Relationship with Competitors	16 
9. Customer Relations	16 
10. Supplier and Service Provider Relations	18 
11. Relations with Public Entities	19 
12. Relationship with Society	20 
13. Rights, Obligations, and Disciplinary Measures	21 

1 Letter From the President

Bem Brasil Alimentos's mission is to participate in people's lives by offering practical, quality food with a unique flavor. Our entire management model is based on values that converge good conduct and ethics in internal and external relations.

The Code of Ethics and Conduct reinforces the organization's commitment to principles that help build an environment of trust (transparency and accountability), guarantee fair and equal treatment for all, and ensure the company's economic and financial viability.

Thus, we adopt this code in order to establish and spread the essential values practiced by our employees, customers, suppliers (products and services), and other related parties.

BemBrasil

2 Presentation

Founded in December 2006, Bem Brasil Alimentos is a manufacturer of frozen pre-fried potatoes and dehydrated potato flakes nationwide and does not participate in any direct or indirect negotiations with the Government. Since its creation, the company adopts practices based on values that translate its respect for the environment, its commitment to food safety, and its responsibility to fulfill legal and regulatory obligations, and it is always aligned with ethical principles and business integrity.

MISSION:

Participate in people's lives by offering practical, quality food with a unique flavor.

VISION:

To be among the largest national companies in the food sector focused on growth, profitability, and longevity.

VALUES:

Flexibility - Being open to change; making room for inventiveness, creativity, innovation, and suggestions.

Excellence - Do more and better.

Ethics and Character - Conduct business with humility, frankness, fairness, and honesty.

Partnership - Keep the integrity of and appreciation for commercial and work relationships alive by always aiming for permanent results.

Merit - Rewards based on performance.

Boldness - Have the courage to see the impossible as something that is possible to accomplish.

Environmental Care - Conscientiously preserve and renew natural resources and contribute to their longevity.



3 Preserving the Institutional Image

3.1. Bem Brasil's image before the market and its internal work environment was built with the effort of all its employees and is a key asset in fulfilling its goals. Thus, preserving the organization's reputation must be a permanent concern for everyone, and its credibility should remain untouched.

3.2. Partners, members of the Board of Directors, employees, interns, young trainees, service providers, and visitors are directly responsible for Bem Brasil Alimentos' image and reputation, including in digital environments. Therefore, the provisions in this Code apply to Bem Brasil Alimentos' employees and management and to third parties associated with the company.

3.3. The employees, management, and third parties associated with Bem Brasil Alimentos are not authorized to make any public quotations on behalf of the company that may somehow damage or defame the image of competitors, suppliers, customers, public entities, or people.

- 3.4.** To safeguard and protect the organization's visual identity, all and any communication material (posters, banners, leaflets, T-shirts, caps, etc.), used internally or externally must be evaluated and approved by the Marketing and Communication Sectors.
- 3.5.** Communication and advertising materials can only be used in commercial and/or promotional actions after analysis and approval by the Marketing Sector.
- 3.6.** Only the organization's CEO or persons formally authorized by the CEO may make official statements on behalf of Bem Brasil Alimentos.
- 3.7.** Employees and service providers may give public statements on technical issues under their responsibility, when invited, with the authorization of the immediate manager and under the direct guidance of the Marketing and Communication Sectors or the press office.
- 3.8.** All employees must look after and preserve the company's reputation and behave properly and with integrity, especially when in uniform or using notebooks, souvenirs, corporate vehicles, backpacks, promotional t-shirts, caps, and other accessories that clearly show their relationship to the company.
- 3.9.** Bem Brasil has made one of its commitments to transparency. Therefore, in relation to the press and other media outlets, as well as to public entities, customers, suppliers, service providers, and employees, the company values ethics, trust, clarity, professionalism, respect, honesty, and commitment to quality.
- 3.10.** In public, employees must always behave in such a way as to ensure the social prestige of the position they hold, observing all political and cultural positions and demonstrating tolerance and respect for human dignity.
- 3.11.** The name of Bem Brasil is not allowed to be used in lectures, courses, and other presentations given by employees without prior authorization from the Management.
- 3.12.** To protect the information made available through its Compliance and Management policies, Bem Brasil Alimentos prohibits the disclosure of such documents without proper authorization from the Internal Audit department.

3.13. The company's Code of Ethics and Conduct is available on the internal documentation platform and on the company's institutional website (<https://www.bembrasil.ind.br/codigo-de-etica-2/>).

4 Preserving Information and the Technological Environment

- 4.1.** The disclosure of any information or confidential data of Bem Brasil Alimentos by employees, service providers, customers, and suppliers is forbidden. This includes strategic initiatives, pay tables, technical specifications of products, and employees' personal information.
- 4.2.** Partners, members of the Board of Directors, employees, interns, young trainees, and service providers must protect and ensure the confidentiality of the information made available or stored in the information systems and may not use it for their own benefit or for the benefit of third parties.
- 4.3.** Employees should ensure absolute secrecy of all passwords related to Bem Brasil.
- 4.4.** Illegal and/or offensive materials, such as pornography and prejudiced content of any nature or content that promotes conduct prohibited by law or by Bem Brasil's rules, are not allowed in any form in the organization's systems or equipment (computers, cell phones, etc.).

- 4.5.** At any time, Bem Brasil may request the tracking or monitoring of programs, e-mails, information, and files in general made available on corporate cell phones or computers in order to ensure the security, transparency, and mainly the integrity of the technological environment and its processes.
- 4.6.** Each and every employee must provide reliable information.
- 4.7.** Every employee must respect Bem Brasil's property, material, and intellectual rights and assumes the obligation to return any and all material assets belonging to the company and not to disclose information that they have access to because of their role at the company in the event of their dismissal.
- 4.8.** All the methodologies and/or processes developed by Bem Brasil's employees exercising the role they were hired for are the organization's intellectual property and can only be used or granted to third parties with formal authorization from the Management.
- 4.9.** In activities involving the processing of personal data, Bem Brasil's employees and management and its associated third parties shall comply with the provisions set forth in the General Data Protection Law (Law No. 13.709/18) and other rules pertaining to the processing of personal data.



5 Preserving Property and the Work Environment

- 5.1.** The employee or service provider holding equipment belonging to Bem Brasil must adequately protect it against damage, loss, theft, or unauthorized access.
- 5.2.** Employees who operate vehicles in Bem Brasil's internal fleet are responsible for preserving their good condition and safe operation and should immediately report any damage due to misuse to the Purchasing Department when identified.
- 5.3.** Employees who use rented vehicles are also responsible for ensuring the proper operation and condition of the vehicle and comply with the terms provided in the contract.
- 5.4.** Each and every employee must be mindful of the conservation of Bem Brasil's property, including its furniture, utensils, and equipment.
- 5.5.** Products, utensils, furniture, equipment, and other items belonging to Bem Brasil can only be moved and/or removed from the company as described below:
- Movements related to the sale of products or transference between units, as well as remittance for the repair or improvement of parts and equipment, are only authorized upon issuance and presentation of an invoice.
 - Movements related to the donation of finished product are only authorized by the Internal Audit department and require an invoice.



- *Movements related to the sale and/or donation of parts, equipment, utensils, furniture, and other items belonging to Bem Brasil are formally authorized by the Executive Board.*

- *Movements that have not been duly authorized are characterized as theft or robbery, in which case the company is allowed to take the applicable measures.*

5.6. *In the workplace, the employee has a duty to talk to their colleagues and on the phone in a low tone of voice in order to maintain a calm environment conducive to concentration.*

5.7. *Smoking, as well as the use of any illegal substances, is expressly forbidden on the organization's premises. Alcoholic beverages are allowed only during celebrations in appropriate places with authorization from the company's Board of Directors.*

5.8. *When the employee or service provider presents themselves to perform their duties, they are required to be in top condition to perform their activities. In other words, they must not be under the effects of alcohol and/or drugs.*

6 Employee Conduct

- 6.1.** In their relations, employees do not discriminate based on ethnicity, nationality, gender, sexual orientation, religious belief, political preference, social class, or disability.
- 6.2.** Bem Brasil prohibits the sale of products and services by employees on the company's premises.
- 6.3.** Conduct characterized as moral and sexual harassment or physical aggression is not tolerated.
- 6.4.** Acts of corruption and fraud, as defined in Law No. 12.846/13, are not permitted.
- 6.5.** Bem Brasil does not allow disrespect to any person in internal or external professional relations.
- 6.6.** The employee may only receive items and/or materials that conform to the Policy on Gifts, Presents, and Hospitality as gifts or presents.
- 6.7.** Gifts and/or presents cannot be received by Bem Brasil's employees or managers if there is the intention to obtain undue personal gains or advantages, compensate for business obtained, or to exchange favors or benefits, whether implicitly or explicitly.
- 6.8.** Employees must help conserve and preserve the environment by handling waste properly and adopting measures and/or practices that aim to prevent of environmental damage.
- 6.9.** Employees and managers must know and comply with the premises and guidelines prescribed in the Policies and Procedures.
- 6.10.** Relations between people should be based on the values practiced by Bem Brasil. Therefore, employees have the following duty:
 - To be courteous, civil, available, and attentive without any kind of prejudice or discrimination based on race, sex, nationality, age, religion, political preference, social status, and any other form of discrimination
 - To observe and comply with the legislation and rules in force in the country, including those related to economic activities and the securities market

- To respect and comply with contracts, agreements, and signed partnerships
- Base its performance on strict principles of honesty, integrity, and dignity, which must be apply to relations with various agents, with society in general, customers, suppliers, employees, partners, and authorities
- To value the internal communication process in order to spread relevant information related to business and corporate decisions, when applicable
- Not to use offensive words
- Not to carry weapons or similar equipment on company property
- To assume responsibilities based on their technical skills and act in a way so as to offer and provide quality services
- To respect the hierarchy
- To analyze business decisions made on behalf of Bem Brasil impartially and objectively and make constructive criticism exclusively within the internal scope
- To communicate any unethical, illegal, or questionable activities or information about people who may directly or indirectly harm Bem Brasil's image immediately to the Ethics Channel or the Board
- Aim to continuously improve and update their knowledge in order to improve their professional skills; provide better services to customers; and contribute to lowering costs, continuously improving processes, and boosting productivity
- To develop efforts to disseminate acquired knowledge among peers and other employees either by preparing technical materials or by organizing and giving courses
- To help create a healthy, productive environment by cooperating with other employees proactively and/or whenever requested
- To recognize the inherent merits of work developed by colleagues
- Not to hurt the image of colleagues through unsubstantiated statements or discriminatory judgments

- *To dedicate their working hours to developing their professional activities, avoiding personal tasks or tasks outside of Bem Brasil's interests*
- *Refuse to receive or pay financial compensation or accept favors from third parties, as well as to obtain any business information by unlawful means*



7 Conflict Of Interest

- 7.1** Employees can execute contracts with companies that maintain commercial relations with Bem Brasil, provided that the interests and principles established by Bem Brasil are prioritized as they conduct their work.
- 7.2** Ties between employees or people/companies that provide services to Bem Brasil and competing companies are prohibited.
- 7.3** Employees must inform the Ethics Committee and/or the Board of Bem Brasil about activities developed with people or entities with which they have or have had family ties, ownership interest, or other affinities.
- 7.4** Employees must communicate any inappropriate practices through the Ethics Channel or directly to Management.
- 7.5** Everyone associated with Bem Brasil has the obligation to prevent and report circumstances that may generate conflicts of interest.
- 7.6** Employees and/or Board members can only run for political or union positions after being analyzed and formally authorized by the Board of Directors of Bem Brasil Alimentos. If their participation is approved, the employee must do so independently without requesting help, support, funding, or any kind of involvement from Bem Brasil Alimentos and its employees.
- 7.7** Employees may become members of Bem Brasil's Board of Directors only upon deliberation at a meeting and formalization in the Articles of Incorporation.
- 7.8** Employees and service providers may not be hierarchically subordinated by spouses/partners and relatives up to first degree. Cases of affective relationships that experience a situation of hierarchical subordination must be treated individually.

7.9 People who hold the position of *Manager, Officer, or Director* can only perform paid activities outside of those performed on Bem Brasil's premises after approval by the Board of Directors. Other positions can perform extra activities but must preserve Bem Brasil's image and information and make sure not to hinder their deliveries.

7.10 Every employee must ensure and enforce compliance with the Conflict of Interest Policy.



8 Relationship with Competitors

- 8.1** Each and every employee must respect Bem Brasil's competitors and their material and intellectual property rights.
- 8.2** Bem Brasil expressly forbids the commission of acts that harm free competition and the image of its competitors.
- 8.3** Bem Brasil values fair competition and always aims to serve its customers' interests. Therefore, any misconduct should be reported immediately through the Ethics Channel or directly to Management.

9 Customer Relations

- 9.1** Customer relations must be based on transparency, honesty, professionalism, and ethics.
- 9.2** Bem Brasil's sales team shall prepare sales proposals with clear, reliable information.
- 9.3** Each and every sales proposal must be reviewed and formally approved by the Board of Directors and/or Sales Management.
- 9.4** Bem Brasil's employees must ensure compliance with the agreed conditions and always aim to meet the customer's full satisfaction.
- 9.5** Bem Brasil's employees should behave in a professional, respectful, and cordial manner with customers.



9.6 Bem Brasil forbids its employees to promise, offer, authorize, grant, give, or receive any undue advantage directly or indirectly relative to its customers, including those who have friendly or family ties with the employee.

9.7 On commemorative dates or situations that require offering institutional gifts, the employee must always observe if the customer has a Policy on Gifts and Presents and respect the guidelines set forth therein. In any case, giving goods that constitute an undue advantage is prohibited.

10 Supplier and Service Provider Relations

- 10.1** Bem Brasil is committed to selecting suppliers in an impartial manner by using only technical and sales criteria and disregarding any bonds and/or ties of friendship or kinship.
- 10.2** Only companies that respect human rights, provide properly safe workplaces for their employees, and comply with legal and tax requirements are part of the list of Bem Brasil's suppliers.
- 10.3** All service providers entering the manufacturer's premises must undergo orientation training, as required by FSSC 22000.
- 10.4** Suppliers and service providers are responsible for selecting their business partners, who must act in compliance with Law No. 12.846/2013 – Anti-corruption.
- 10.5** Contracts signed with suppliers and/or service providers are required to contain specific clauses related to the practice of anti-corruption and to comply with the company's values and the effective legislation.
- 10.6** Suppliers, service providers, and their partners may be audited and have their respective contract terminated or suspended if there is evidence of practices related to criminal infractions or unlawful acts or against the contract, Bem Brasil's rules, and/or Brazilian legislation.
- 10.7** Bem Brasil forbids its employees to promise, offer, authorize, grant, give, or receive any undue advantage directly or indirectly relative to its suppliers and service providers.
- 10.8** Contracts with Bem Brasil's suppliers must always contain an anti-corruption clause which is aligned with the company's values and the current legislation.

10.9 Situations related to hiring suppliers and details on the respective procedure are provided in the Policy for Selecting, Hiring, and Supervising Third Parties (PLC-ADM-06).

11. Relations with Public Entities

- 11.1** Bem Brasil does not support any acts of bribery and corruption against the Government, domestic or foreign. All its practices converge to curb and prevent such behaviors.
- 11.2** In its relations with the Government, whether directly or indirectly, Bem Brasil must act with integrity and transparency through its employees, representatives, or third parties.
- 11.3** Whenever requested, Bem Brasil will assist the Government in its inspection of the company's practices.
- 11.4** The use or association of Bem Brasil's brands, resources, and services with a political party's activities is expressly prohibited.
- 11.5** In Bem Brasil's relations with any Government entity, the following acts are forbidden:
- a)** Directly or indirectly promising, offering, or giving an undue advantage to a public agent or to a related third party
 - b)** Financing, funding, sponsoring, or in any way subsidizing the commission of illicit acts
 - c)** Using a natural person or legal entity to conceal or feign its real interests or the identity of the beneficiaries of the acts committed



12 Relationship with Society

- 12.1** Bem Brasil is committed to society by valuing people, respecting governmental and non-governmental institutions, and developing actions that aim to preserve and conserve the environment and health.
- 12.2** Donations, sponsorships, and transfers of tax incentives to support cultural and social development are practices adopted by the organization by means of the guidelines provided in its internal policies and procedures.

13 Rights, Obligations, and Disciplinary Measures

13.1 The rights and obligations set forth in the Code of Ethics and Conduct are an extension of the work relationship between the employees and Bem Brasil Alimentos and, as such, should be observed and fully observed by all, regardless of position or the position one occupies.

13.2 Behavior that deviates from or does not comply with the guidelines set forth in this document must be reported immediately. Bem Brasil ensures to protect the whistleblower's identity in good faith and to establish preventive measures against retaliation through its policies.

To report a complaint or misconduct, refer to the following ways:

1. Notification to Internal Audit Department

2. Bem Brasil's Ethics Channel:

- 0800 750 5560;

- www.bembrasil.ind.br



- 13.3.** As established in the procedures of the Complaint Reporting Channel (POP-ADM-01), Bem Brasil ensures the total integrity of the whistleblower in good faith and inhibits any acts of retaliation.
- 13.4.** Everyone has the duty and responsibility to report any illegal acts, misconduct, criminal offenses, and violations of the rules described herein and in anti-corruption legislation.
- 13.5.** In the event of any type of complaint, the Ethics Committee is responsible for receiving and investigating it, creating action plans, and defining which disciplinary measures should be applied according to the procedure for Receiving and Handling Complaints (POP-ADM-01), which may include verbal warnings, written warnings, fines, contract termination, or dismissal.
- 13.6.** The application of disciplinary measures is proportional to the conduct, considering eventual situations of recurrence.





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