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# **CORPORATE CONDUCT GUIDELINES**

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EST. 1949

# **PRIMA**

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## Scope

**This document covers:**

- Shareholders
- Management
- Employees
- Interns
- Apprentices
- Suppliers
- Service providers
- Business partners

# Introduction

Ethics on the job guides the content of decisions (what I should do) and also the decision-making process (how I should do it). Therefore, knowing that our daily concerns with efficiency, competitiveness and profitability can never do without ethical and responsible behavior, and inspired by good corporate governance practices, we developed the Prima Foods Corporate Conduct Guidelines, presented below.

The Guidelines have general application and bring together, in a clear and practical way, a set of guidelines based on the Company Values and should guide the conduct of our business and the behavior of our employees.

The guidelines set forth the ethics of our company, that is, the attitudes we consider appropriate to ensure the Prima Foods reputation, our assets and good relationships with employees, shareholders, customers, suppliers, governments, and society in general. The purpose of this document is to act as an individual and collective reference, ensuring that everyone who relates to Prima Foods acts in compliance with the Guidelines. The guidelines in this document must be followed in the daily performance of activities. That is why, it is essential that everyone reads the guidelines carefully and that they take on the commitment to disseminate the guidelines and follow the behaviors explained herein.

It is very important to consult the guidelines in case you have any doubts about how to proceed and also to report any potential violations or any other legal or ethical issues found in your daily work. Our leaders are responsible for ensuring that these Guidelines are understood and followed, adequately correcting inappropriate conduct in their teams, managing any manifestations of non-compliance, and promoting the enforcement of these premises by our business partners.

We hope that this document will also encourage the practice of these same principles in the personal lives of our employees, driving the construction of a more just and responsible society.

# Our Values

## Owner's spirit

Caring for Prima Foods assets and interests as if they were their own.  
Not allowing decisions to be made in detriment of the company.

## Operating excellence

Working pursuing the best result for the business as a whole. Doing it right and aiming to always achieve the best results.

## Simplicity

Seeking to simplify processes and reduce bureaucracy, proposing practical and feasible solutions in favor of the company. Being accountable for errors and being open to learn.

## Availability

Being available and cooperative, putting oneself in the shoes of others and offering suggestions.

## Planning

Thinking, organizing, and performing activities with a clear view of the beginning, middle and end.

## Teamwork

Believing in the strength of the group. Encouraging the union of people pursuing a common goal.



# Mission

Continue developing the company and its processes, working in a professional manner to exceed customer expectations.

# Business

Process high-quality beef.

# Vision

Be recognized by our customers and partners as a professionalized company with operating excellence.

# Commitment to our people

All Prima Foods actions, with regard to the treatment and management of its employees, must be guided by the enforcement of the People Management Principles. Our People Management Principles describe the basic culture and behaviors that we expect from our employees, as well as the basic attributes necessary for success in management and leadership.

We understand that the responsibility for a favorable work environment is shared by everyone and we hope that our employees will personally commit themselves, both in order to promote a respectful, cooperative, and solidary professional environment, as well as in generating results and operating excellence.

## Principles of corporate responsibility

### Entrepreneur spirit

We continuously seek excellence. We excel to do our business better every day. We learn from our mistakes and celebrate our success. We expect our leaders to consciously guide the teams, giving them the freedom so that employees can participate in decision-making and express their opinion freely, preserving Prima Foods strategic interests, as well as the ethical and business limits that must support everyone's decisions.

On the other hand, our expectation is that employees will exercise their freedom with responsibility.

### Occupational Health and Safety

Prima Foods is committed to complying with occupational health and safety regulations, as well as respecting the Regulatory Standards (NRs), to ensure a healthy and safe work environment, as our goal is ZERO ACCIDENTS. We will ensure that our health and safety standards and norms are understood by everyone in the organization.

We will provide guidance and training for all people to create awareness of the need to ensure health and safety in the workplace.

## **Fair labor relations**

We strive to encourage an environment of trust, to ensure that employees can express their work-related doubts, troubles, problems, and suggestions, and seek a quick solution that satisfies everyone involved. With this attitude, we aspire to ensure that our employees are aware of the correct and appropriate procedures and that they know how to apply them.

On the other hand, Prima Foods has as a policy to not hire close relatives or people with a close personal relationship within the same line of subordination and carries out the selection processes based on the requirements of the Job Profile.

## **Dignity in the workplace**

Prima Foods values the respectful relationship between all employees, regardless of their hierarchical level and/or position. Therefore, the company does not accept any conduct—be it physical, verbal, or non-verbal—that would affect the dignity of people in the organization, in particular, conduct that creates intimidation, hostility, humiliation, moral or sexual harassment, as it degrades the work climate and environment and affects productivity.

## **Stimulating talent and high performance**

The Prima Foods strategy is based on retaining and attracting talent at all hierarchical levels. Whenever possible, we will fill job positions with internal resources. However, we will not stop looking for external talent, as this strategy offers the opportunity to bring in fresh perspective to the company with new ideas and experiences.

We recognize the value of people's performance and fulfilling role and encourage everyone to demonstrate and share their ideas.

We value the thoughtful recognition of employees with regard to: qualification, skills, ATTITUDE, performance, results achieved and productivity, guaranteeing a meritocratic process to develop and maintain a culture of motivation and high performance.

## **Diversity and equal opportunities**

Prima Foods is devoted and committed to providing equal opportunities to all its employees. We do not discriminate against race, color, sex, religious creed, age, social class, sexual orientation, and persons with disabilities.

We know that the active practice of diversity is a challenge, but it is up to us to build an environment where diversity is valued, promoting interactions between differences.

# **Employee Responsibility Principles**

## **Ethical and responsible conduct**

We expect our employees to act in accordance with the standards of ethical conduct, working and acting in a way that does not harm others and does not contradict the Prima Foods standards and procedures.

That employees have conduct that protects the company from financial losses resulting from extortion, fraud, theft, and other dishonest practices and that they will protect the Prima Foods reputation with the community, customers, suppliers, government, and other employees. Likewise, we understand that all employees must comply with the established health and safety standards, undergoing periodic health testing within the schedule, using personal protective equipment, and encouraging their colleagues to do the same.

## **Respectful treatment**

It is the duty of each employee to work in order to maintain frank and friendly relationships, favoring mutual respect with constructive and continuous dialogue.



## **Responsibility for self-development**

Prima Foods recognizes that each of its employees has personal and professional aspirations and expects them to continually pursue their self-development, focusing on the skills required for available career paths, so that they feel secure and can evolve according to the opportunities as they come up.

It is the responsibility of employees to participate in the training programs adopted by the company for both technical qualification and behavioral improvement.

## **Commitment to performance and delivering results**

We expect our employees to contribute to the success of Prima Foods and to its evolution as a company and as a business. In this context, we understand that employees must be committed to delivering the expected result and the established goals.

On the other hand, Prima Foods is responsible, through leadership, for providing continuous feedback, developing actions that favor the continuous improvement of performance.

## **Attention to execution and care for the company assets**

It is the responsibility of employees to carry out their functions properly, ensuring compliance with policies, standards, and operating procedures, striving to satisfy and exceed customer expectations (internal and external), as well as the constant improvement in the quality and performance of our products and services.

In the performance of duties, it is essential to look after company assets, both in physical terms, such as facilities, equipment, furniture, consumables and other goods and resources, as well as the broader scope, which includes, for example, the Mataboi and Di Prima brands, as well as company reputation and its relationship with suppliers and customers.

Everyone in their daily work routine must adopt actions to preserve the environment.

# Moral Harassment and Sexual Harassment

Moral and sexual harassment must be faced with seriousness, sensitivity, and commitment by all employees to build healthy working relationships.

Prima Foods repudiates any form of disrespect, including moral and sexual harassment, the concepts of which are described below:

## a. Moral harassment:

Abusive, frequent, and repetitive conduct that manifests itself through words, acts, gestures, behaviors or in writing, which humiliates, embarrasses, and disqualifies the person or a group, affecting their dignity and physical and/or mental health, affecting their professional and personal life.

## b. Sexual harassment:

There are two kinds of sexual harassment:

1. **Sexual harassment by blackmail:** hierarchical superior or someone in a position of power over the victim. Sexual harassment is when the superior aims to obtain sexual favors from an employee in exchange for better working conditions, better wages or maintaining their job.
2. **Sexual harassment by intimidation:** Any person who is part of the work team, regardless of the hierarchy (a co-worker or any other employee of the company). In this case it is characterized by sexual, physical, or verbal intimidation, creating a hostile, humiliating, and intimidating environment in the workplace.

# Social Responsibility

## Forced and Child Labor

We do not accept child labor and forced or compulsory labor, deemed as work carried out under threat or without employee consent. We make sure that our suppliers act accordingly.

## Violence

We do not tolerate manifestations of violence, whether physical, verbal or otherwise, both in the workplace and in common areas.

## Carrying weapons

We prohibit carrying or storing weapons and ammunition on Prima Foods premises or in activities related to the company.

## Smoking, alcohol, and illicit drugs

We prohibit the possession, consumption, and sale of illicit drugs at Prima Foods. No employee should report for work while intoxicated or in a similar situation that poses a risk to themselves and/or coworkers. Smoking on company premises is prohibited.

## Environment

We carry out all our activities in compliance with environmental legislation and standards. We aspire to optimize the use of natural resources and the preservation of nature and biodiversity.

We do not purchase raw materials from the Amazon Biome or from illegal deforestation areas included in the IBAMA (The Brazilian Institute for the Environment and Renewable Natural Resources) embargo list.

## **Union entities**

We seek to maintain a respectful relationship with union entities and do not discriminate against unionized professionals.

## **Community**

We value social and cultural development of the communities in which we operate. We are always attentive to the impacts eventually produced by our operations.

## **Politics**

We understand that political party option is personal, but we reserve the right to maintain ourselves in a neutral position and encourage the same impartiality among employees in the workplace.

# **Business integrity**

## **Government**

We are completely against corruption. We will not allow our employees, or anyone who acts on our behalf, to offer, solicit, pay, or accept bribes.

We encourage our employees to guide their activities and relationships with government agencies and agents within the strictest legality and morality, acting with honesty and transparency and always making sure that they have the necessary approvals to respond to requests or interact with government agencies or regulators.

## **Competition**

We understand that fair competition enables free development of markets and also creates social benefits. We make our business decisions based on the principles of loyalty and a fair market relationship. We do not exercise any type of agreement or understanding with competitors to fix prices, collude in bids, allocate customers and/or restrict supply.

## Trade partners

We base our business relationships on integrity, honesty, and mutual respect. We select our suppliers carefully, always looking for the best value for money. Our negotiations always take place through dialogue based on trust and transparency. We do not offer any privileged treatment to any suppliers.

## Customers and consumers

We value quality and transparency in negotiations with our customers aiming at long-lasting relationships. We make every effort to comply with all consumer rights provided for by law and aim at exceeding the expectations of those who come into contact with our brands. We promote efficiency, respect, and courtesy, responding to requests in an appropriate manner and within the established deadlines. We maintain communication channels for customer service, receiving, handling, and responding to their demands.

## Shareholders

We operate strictly according to our policies and guidelines, faithfully reflecting the Company situation in our economic and financial statements. We act reliably when providing information to shareholders. Only authorized personnel may provide information to the market.

## Conflict of interest

### Employees are prohibited from:

- Negotiating or influencing negotiations for the purpose of obtaining privileges of any kind for themselves or for third parties.
- Carrying outside activities during working hours, such as: sales, exchanging goods or services for their own interest.

- Participating in any action that involves fraud, theft, misappropriation, embezzlement, or similar illegal activities.
- Using facilities, materials, equipment, and other physical assets for unauthorized purposes that are not related to job responsibilities.

## **Gifts and presents**

Acceptance of promotional gifts is allowed provided they have the logo of the company that is offering the gift and a symbolic value.

It is forbidden to accept or offer gifts or any other type of advantage to obtain any type of consideration.

## **Hiring and moving family members and people**

There should be no direct subordinate relationship with any family member of any degree, spouse, or any person in a romantic or sexual relationship.

Managers must not employ or promote relatives of any degree, spouse, related by consanguinity or affinity without being evaluated by Human Resources and competing on equal terms with other candidates.

## **Donations and sponsorships**

Donations and/or sponsorships must comply with the programs defined and approved by Management.

## **Business events and meals**

Employee participation is allowed in national and international events promoted by business partners as long as it is in line with the interests of Prima Foods and is approved by Management.

Business meals area allowed as long as they comply with the Travel Request and Expenses Procedure.

## Accurate and honest records

We believe that accurate and honest records are critical for making the right business decisions and maintaining the integrity of our reports. Business information, in any format, must reflect the actual nature of our transactions.

## Information security and confidentiality

- Prima Foods email, internet, telephone, and other communication systems must solely be used for performing the job.
- Our systems must never be used in ways that may be deemed illegal, inconvenient, or offensive, or that may reflect negatively on company image.
- Confidential documents and emails must be carefully circulated, not being exposed, and ensuring they reach the recipient without diversions.
- Media resources must not be installed and own resources and/or unauthorized resources must not be used to transport or transmit work-related information.
- Passwords and access codes to internal systems, must not be shared as they are individual and non-transferable.

## Privacy and confidentiality

- Prima Foods is committed to the privacy and confidentiality of the information collected from all stakeholders and does not authorize providing or using information deemed classified or confidential without authorization, except to comply with judicial determination.

## Information and interactions on social media

- Photographs or video recordings of facilities, products and processes is not allowed, unless authorized in advance.
- The following must not be disclosed without prior authorization:
  1. images or videos, related to the business of the company;
  2. information on or comments on behalf of Prima Foods on Internet portals or on social media in general.
- Anything that could cause a negative impact on Prima Foods reputation must never be commented or posted.

## Press relations

Contact with the press should be made only by the spokesperson specially appointed by Prima Foods for this purpose. No employee is authorized to speak on behalf of Prima Foods. Any approaches from external communication media must be reported to the hierarchical superior or HR for proper guidance.

## Privileged information

Information that is not public must be kept confidential. The use of privileged information for personal benefit or for third party benefit is a crime, subject to labor and criminal sanctions. Employees who have privileged and/or strategic information must take all necessary care so that information is not disclosed without the proper authorization from Management.

**External presentations on behalf of the company  
must be approved by Management.**



## Communication channels

The HR Ombudsperson is a channel for local relationships with our stakeholders (employees, interns, apprentices and third parties), the channel acts independently.

Through the ombudsperson, manifestations are received, handled, and classified, according to their nature, as follows:

- a) **Praise:** demonstration of satisfaction/recognition about any situation, act, or behavior.
- b) **Suggestions:** giving an idea to improve processes and procedures related to people management.
- c) **Complaints:** manifestation containing displeasure regarding any situation, action or omission involving Prima Foods and/or its employees and third parties.
- d) **Doubts:** for guidance on a specific situation involving conflicts of interest and ethical dilemmas or clarification on the correct application of the Prima Foods Corporate Conduct Guidelines, policies, or procedures.
- e) **Evidence of irregular conduct or illegal act:** reporting the suspicion of irregular conduct (interpersonal conflict and conflict of interest, negligent or abusive practice in the workplace), ethical deviations, illegal acts (fraud, theft, corruption) and violation of institutional policies and procedures that may cause harm to Prima Foods.

### The following are not included in the Ombudsperson scope

Receiving manifestations that report private and personal issues unrelated to Prima Foods operations, as well as judicial issues.

## Receiving and handling manifestations

The manifestations are received, handled, forwarded, monitored, and answered with independence, impartiality, ethics, and confidentiality.

The Ombudsperson does not replace the communication channels for first assistance. It is recommended that the channels are always engaged in this order:

1. Immediate supervisor;
2. Superior of the immediate supervisor in the hierarchy, at any level (if the claimant does not feel comfortable dealing with the matter with the direct manager);
3. HR Ombudsperson;
4. Ethical Hotline (in situations where the claimant understands that the matter must be taken to the C-level).

## Assessment of the situation by the claimant:

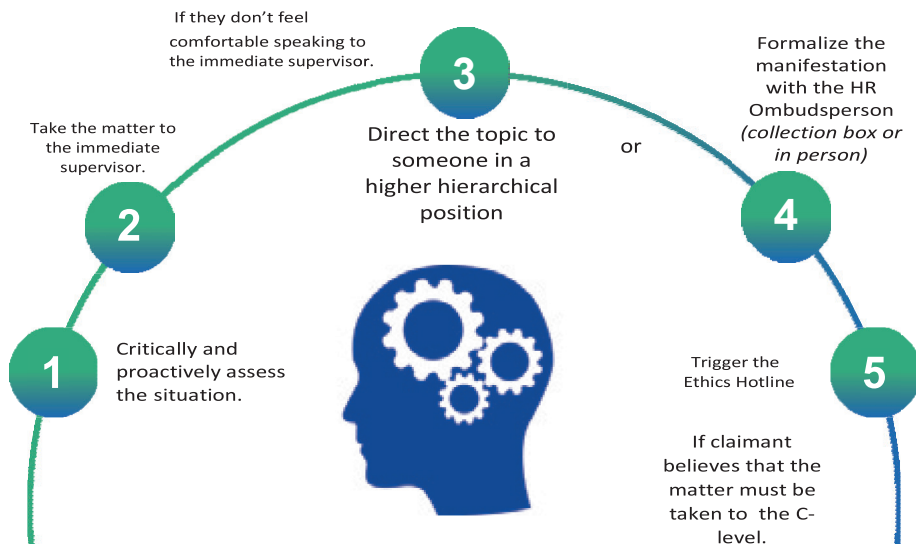
In any case, the claimant must, first analyze and criticize based on the questions presented below:

1. Am I assessing the issue honestly and impartially?
2. Does this situation have the necessary relevance to be taken to a higher level?
3. Am I proud of this attitude? Would I be proud to tell someone I admire, how I handled this situation?
4. Can I resolve the issue directly? Have I tried to resolve it?

After answering the questions, if the claimant feels any trouble in interpreting our Corporate Conduct Guidelines or feels the need to make any manifestation, claimant must not hesitate to follow the flow of communication shown below, so it is properly handled.

**Maintaining an open channel of communication is part of our principles. Anyone who manifests themselves in good faith will not suffer retaliation of any kind.**

## Internal communication flow for employee manifestations



The collection box is an additional alternative for employees to express themselves. Access to the content is restricted to the Ombudspersons. The employee may complete the collection form anonymously, that is, without having to identify themselves, and place it in the box.

The Ethics Hotline may be contacted by  
email: **[linha-etica@primafoods.com.br](mailto:linha-etica@primafoods.com.br)**

Claims through this channel may be anonymous (generic email) or identified (personal email).

Using this flow to make false accusations, or to provide untrue information, is unethical and may have criminal consequences.

## Deviations of conduct

Whenever violations of these Guidelines are found, appropriate measures will be taken. They may be educative, corrective, warnings and even termination for just cause, depending on the severity of the situation.

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