







Code of Ethics and Standards of Professional Conduct



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1. Letter from the President

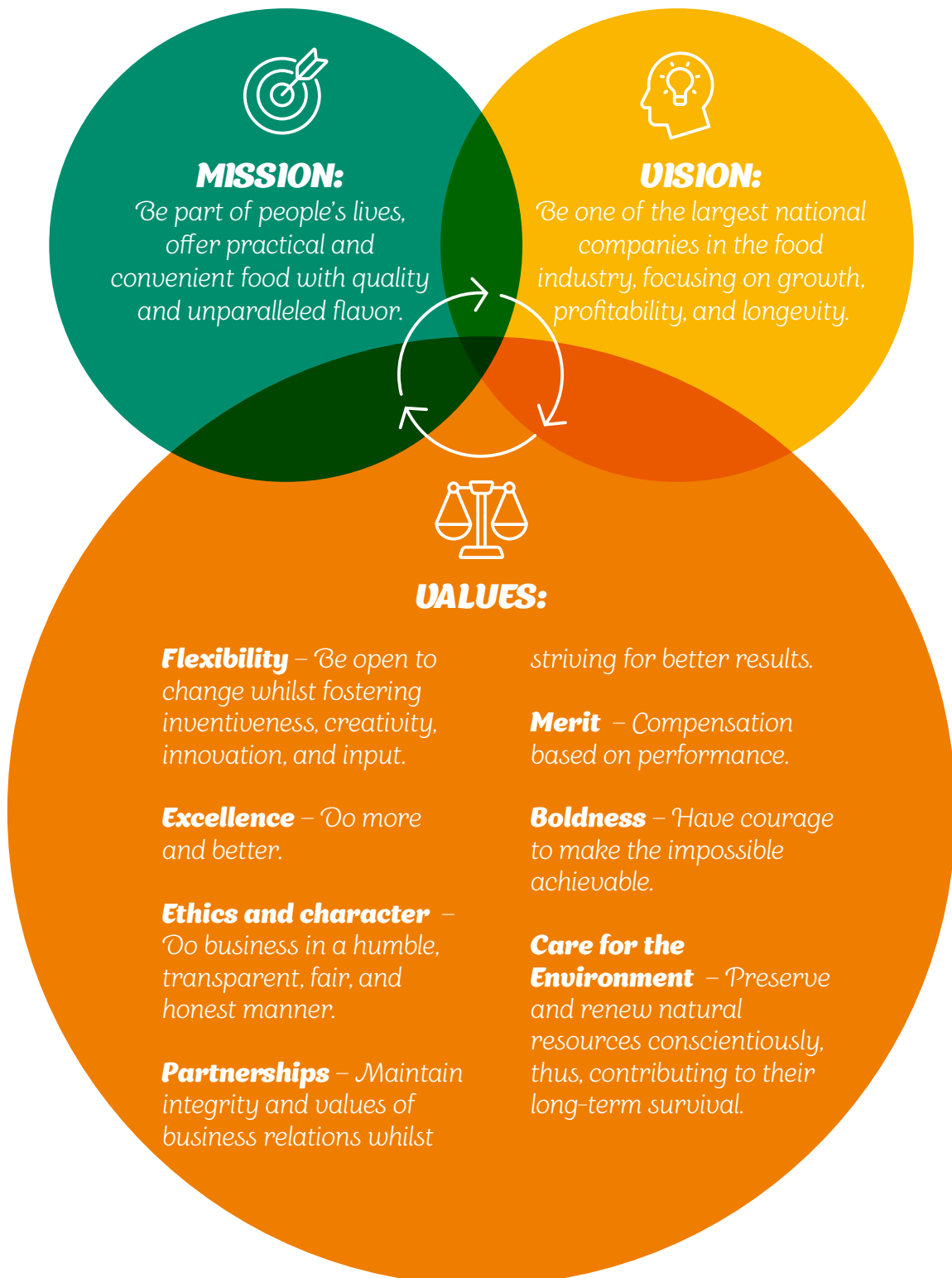
The mission of Bem Brasil Alimentos is to be part of people's lives, and offer practical and convenient food with quality and unparalleled flavor. Thus, our management model is informed by values of proper conduct and ethics for internal and external relations.

The Code of Ethics and Conduct reinforces the organization's commitment to principles that foster a relationship of trust, guided by transparency and accountability, advocate fair treatment — based on equity and respect for the responsibilities and duties of each role — and safeguard the company's economic and financial viability.

Hence, this document aims at defining and sharing such fundamental values with employees, clients, product and service suppliers, as well as all stakeholders.

2. Presentation

Founded in 2006, Bem Brasil Alimentos produces frozen pre-fried fries and dehydrated potato flakes nationwide. The company does not engage in either direct or indirect businesses with the government. Bem Brasil has always adopted practices informed by the company's values. Such values represent the company's respect for the environment, commitment to food safety, and accountability for legal and regulatory compliance. All of which are in consonance with ethical and business integrity principles.







3.1. Bem Brasil's image before the market, as well as the company's work environment have been built by its employees. This is truly a paramount asset in order to meet the company's goals. Thus, everyone shall protect the company's reputation and credibility.

3.2. Partners, board members, employees, interns, apprentices, service providers, and visitors are accountable for Bem Brasil's image and reputation, including online. Hence, not only is this document written for Bem Brasil employees and partners, it is also meant for third parties engaging with the company.

3.3. Neither employees, partners nor third parties engaging with Bem Brasil are authorized to publicly speak on behalf of the company, especially in a way it may harm or discredit the image of competitors, suppliers, clients, public bodies, or citizens.

3.4. All internal and external communication means, such as charts, banners, pamphlets, T-shirts, and caps shall be reviewed and approved by the Marketing and Communication Team. This step reassures and protects the company's visual identity.

3.5. Communication and advertisement pieces shall be used in commercial and/or publicity campaigns only after they have been reviewed and approved by the Marketing Team.

3.6. Those who are authorized to publicly speak on behalf of Bem Brasil are the CEO or duly authorized representatives appointed by the CEO.

3.7. Employees and service providers shall make public statements on technical issues under their responsibility when invited to do so. This is subject to authorization by their immediate manager, the marketing and Communication Team, or the Press Advisory Team.

3.8. All employees shall uphold and protect the company's reputation by behaving lawfully and righteously. This is especially true when wearing the company's uniform, driving corporate vehicles, or using any corporate gear which clearly establishes their connection to the company.

3.9. One of the actions Bem Brasil has committed to is transparency. Thus, the company strives to be ethical, trustworthy, professional, respectful, honest, and committed to quality. That is when interacting with the press, media outlets, public bodies, clients, suppliers, service providers, and employees.

3.10. Employees shall behave publicly in a way to uphold the social prestige of their role, respect every political view and culture, be tolerant and respectful of human dignity.

3.11. Bem Brasil's name shall not be used in speeches, courses, or presentations given by employees unless authorized by the Administrative Team.

3.12. Bem Brasil Alimentos forbids the distribution of the company's Compliance and Management Policies unless duly authorized by the Internal Audit Team. This measure aims at protecting the information contained in such documents.

3.13. The Code of Ethics and Standards of Professional Conduct is available on the document control internal platform, as well as the company's website <https://www.bembrasil.ind.br/codigo-de-etica-2/>.





4 *Protecting Information and Technology Environment*



4.1. Employees, service providers, clients and suppliers are strictly prohibited from disclosing any Bem Brasil information or confidential data. This includes strategic initiatives, table of wages, product technical details, and employees' personal details.

4.2. Partners, board members, employees, interns, apprentices, and service providers shall protect information made available or stored in the company's digital systems, as well as keep its confidentiality, and not use it for personal or third-party gains.

4.3. Employees shall keep all their Bem Brasil passwords confidential.

4.4. Illegal or offensive content, such as pornography, racist content of any sort, anything which incites behavior prohibited by law or by the rules of the company are not allowed to be accessed through the company's systems or equipment (computers, mobile phones, etc.) under any circumstance.

4.5. Bem Brasil may request tracking or monitoring of programs, emails, information, and files in general from corporate computers or mobile phones without further notice. This measure aims at maintaining security, transparency, and, above all, integrity in the technology environment and within its processes.

4.6. Each and every employee shall provide reliable information.

4.7. All employees shall respect Bem Brasil's material intellectual property rights, and commit to return any and everything which belongs to the company. They shall also commit to not disclose information they have had access due to their role, should they resign or be dismissed.

4.8. Every methodology and/or process developed by Bem Brasil employees when working in the role they were hired for is the company's intellectual property and shall only be used or shared with third parties when formally authorized by the Administrative Team.

4.9. When working with client personal data, Bem Brasil employees, partners, and third parties engaging with the company shall comply with Brazil's General Data Protection Regulation (Law No. 13709/18) and other regulations pertaining to the use of personal data.



5 *Protecting Assets and Work Environment*

5.1. Employees or service providers who carry Bem Brasil equipment shall protect it properly against damages, loss, theft, or unauthorized access.

5.2. Employees who drive corporate vehicles from Bem Brasil's internal fleet shall maintain their original conditions and report any damages due to misuse to the Procurement Team immediately.

5.3. Employees who drive rental vehicles shall also maintain their original conditions as per the clauses of the rental agreement.

5.4. Each and every employee shall maintain Bem Brasil's facilities conditions, as well as its furniture and equipment.

5.5. Products, furniture, equipment, and other items belonging to Bem Brasil shall only be moved or removed from the company under the following scenarios:

- actions related to selling products, transferring products to different units, sending pieces and equipment to be fixed or customized are approved when receipts are issued;
- actions related to donating used products are approved by the Audit Team and receipts shall be issued;
- actions related to selling and/or donating pieces, equipment, furniture, and other items belonging to Bem Brasil shall only be moved or removed from the company when formally authorized by the Financial-Administrative Board of Directors.

Actions that have not been duly authorized are considered theft and are subject to applicable measures.

5.6. Employees shall speak on the phone using a lower tone of voice in order to maintain a quiet work environment at the company's premises.

5.7. Smoking, as well as using any illegal substance are strictly prohibited at the company's premises. Alcoholic beverages are allowed during celebratory events at specific places when authorized by the Board of Directors.

5.8. Employees and service providers shall be in condition to perform their duties, that is, not under the influence of alcohol and drugs when they come into work.



6 *Employee Professional Conduct*



6.1. When engaging with one another, employees shall not discriminate based on race, origin, gender, sexual orientation, religion, political views, social group, or disability.

6.2. Bem Brasil forbids employees and service providers to sell products at the company's premises.

6.3. Behaviors associated with moral and sexual harassment or physical assault are not tolerated.

6.4. Actions of corruption and fraud, defined as per Law No. 12846/13, are not accepted.

6.5. Bem Brasil does not accept actions of disrespect to anyone in internal or external professional interactions.

6.6. Employees shall only receive corporate gifts which are compliant with the Gifts and Hospitality Policies.

6.7. Employees and partners shall not receive corporate gifts if there are improper benefits or advantages, rewards for business transactions, or exchange of favors associated with such action, those being implicit or explicit.

6.8. Employees shall uphold the protection of the environment by properly disposing of garbage, as well as adopting measures and/or actions to prevent environmental damage.

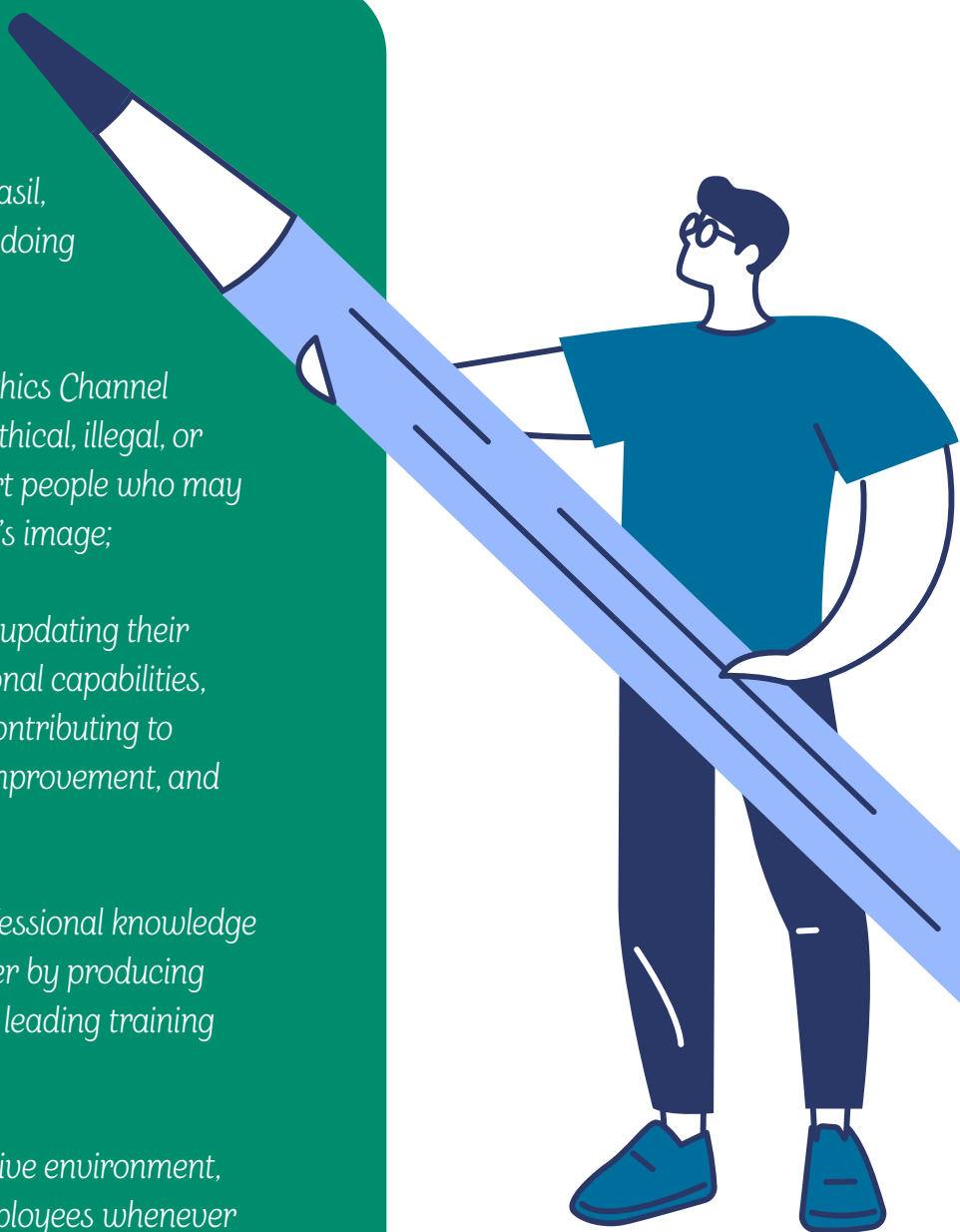
6.9. Employees and managers shall know and comply with the guidelines in the company's policies and procedures.



6.10. Relations between employees shall be informed by Bem Brasil's values. Thus, employees shall:

- be polite, be courteous, be available to interact with peers, and not discriminate based on race, gender, origin, skin color, age, religion, political view, social group, or other;
- respect and comply with legislation and regulations currently effective in the country, which includes economic and real estate investment activities;
- respect and meet the terms of the contracts, agreements, and partnerships;
- behave professionally with honesty, integrity, and dignity and apply such principles to their relations with agents, society in general, clients, suppliers, employees, partners, and authorities;
- value the internal communication process so as to share relevant information associated with the business and corporate decisions, when applicable;
- not use curse words;
- not bear guns or other weapons on the company's premises;
- take responsibility, as per their technical capabilities, offer and provide quality services;
- respect the company's hierarchy;

- behave in an exempt and objective manner when analyzing business decisions made on behalf of Bem Brasil, providing constructive criticism, and doing so internally;
- immediately communicate to the Ethics Channel or the Board of Directors any anti-ethical, illegal, or questionable actions, as well as report people who may direct or indirectly harm Bem Brasil's image;
- aim continuously at improving and updating their knowledge, enhancing their professional capabilities, providing better services to clients, contributing to cost reduction, process continuous improvement, and productivity increase;
- dedicate themselves to sharing professional knowledge with peers and other employees either by producing technical documents or creating and leading training courses;
- contribute to a healthy and productive environment, cooperate proactively with other employees whenever needed;
- acknowledge their peers' professional achievements;
- not harm their peers' professional image by making unfounded statements or discriminatory judgments;
- use their working hours toward professional tasks, avoid using their working hours for private tasks or tasks which does not pertain to Bem Brasil;
- not make or receive payments as financial compensation, accept favors from third parties, and obtain business information by unlawful means.





7

Conflict of Interest

7.1. Employees shall maintain contact with companies Bem Brasil does business with, provided Bem Brasil's interests and principles are prioritized during such interactions.

7.2. Relations between employees, people and/or companies engaging with Bem Brasil and its competitors are prohibited.

7.3. Employees shall disclose any interaction with people or entities with which they have kinship ties, shareholder involvement, or other relations to the Ethics Committee and/or Bem Brasil Board of Directors.

7.4. Employees shall report any inappropriate practice to the Ethics Channel or the Administrative Team.

7.5. Anyone who engages with Bem Brasil shall avoid and report any circumstances which may become a conflict of interest.

7.6. Employees and/or board members may run for political office or union office provided they communicate it to Bem Brasil's Administrative Board of Directors for review and approval. Thus, once it is approved, the employee shall run for office independently, without any help, support, financing, or any engagement with Bem Brasil and its employees.

7.7. Employees shall become members of Bem Brasil's Administrative Board of Directors once such decision is made and added to the company's statute.

7.8. Employees and service providers shall not have roles under their hierarchical level filled by their spouses/partners or first-degree relatives. If workplace relationships involve employees in different hierarchical levels, such matter shall be dealt with on an individual basis.

7.9. Manager, director, or advisor roles shall be simultaneously employed elsewhere, provided they communicate it to Bem Brasil's Administrative Board of Directors for approval. Other roles shall be simultaneously employed elsewhere, provided Bem Brasil's image and information are protected, as well as their deliveries are not impacted.

7.10. Every employee shall uphold and comply with the Conflict of Interest Policies.





8

Relations with Competitors

8.1. Each and every employee shall respect Bem Brasil's competitors, as well as their material intellectual property rights.

8.2. Bem Brasil strictly forbids behaviors that may harm free competition and its competitors' image.

8.3. Bem Brasil values trustworthy and fair competition, focusing on meeting the clients' needs. Hence, any misconduct shall be reported immediately to the Ethics Channel or the Administrative Team.

9

Relations with Clients



- 9.1.** Relations with clients shall be grounded on transparency, honesty, professionalism, and ethics.
- 9.2.** Bem Brasil's Business Team shall write business proposals with clarity and integrity of information.
- 9.3.** Each and every business proposal shall be reviewed and formally approved by the Board of Directors and/or Business Management Team.
- 9.4.** Bem Brasil's employees shall meet the terms of the agreement, focusing on meeting the clients' needs.
- 9.5.** Bem Brasil's employees shall behave professionally, respectfully, and politely when engaging with clients.
- 9.6.** Bem Brasil forbids its employees to promise, offer, authorize, grant, give or receive any improper advantage to their clients, that being directly or indirectly, including those who are their friends or family members.
- 9.7.** On special dates or occasions, corporate gear may be gifted to clients. Employees shall confirm the client is aware of the Corporate Gifts Policies. Employees shall also respect their guidelines and not offer gifts that may represent improper advantage.



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Relations with Suppliers and Service Providers

10.1. Bem Brasil is committed to requesting proposals from suppliers and selecting them in an impartial manner, taking solely into account business and technical criteria and disregarding any relations and/or friendships or kinship ties.

10.2. Bem Brasil's range of suppliers are companies that respect human rights, provide a safe workplace for their employees, and comply with legal and tax requirements.

10.3. Before coming to the company's premises, all service providers shall take the integration training, as per FSSC 22000 requirements.

10.4. Suppliers and service providers are responsible for selecting their business partners. Those shall work in compliance with Law No. 12846/2013 - Anti-corruption Law.

10.5. Agreements signed with suppliers and/or service providers shall include specific clauses on anti-corruption actions and compliance with company values and legislation currently effective in the country.

10.6. Suppliers, service providers, and their partners may be audited and have their corresponding agreements terminated or suspended should there be evidence of criminal offense, unlawful actions, or contrary to the clauses of the agreement, Bem Brasil regulations, and/or the Brazilian legislation.

10.7. Bem Brasil forbids its employees to promise, offer, authorize, grant, give or receive any improper advantage to their suppliers and service providers, that being directly or indirectly.

10.8. Agreements with Bem Brasil suppliers shall include the anti-corruption clause, being compliant with the company's values and regulations currently effective in the country.

10.9. Scenarios related to hiring suppliers and guidelines of such process are described in the Third-Party Selection, Hiring, and Monitoring Policies (PLC-ADM-06).





11

Relations with Public Bodies

11.1. Bem Brasil does not support any bribery or corruption actions taken against national or foreign governments. All Bem Brasil practices are in consonance with suppressing or preventing such actions.

11.2. When directly or indirectly engaging with the government, Bem Brasil employees, representatives, or third parties shall behave with integrity and transparency.

11.3. When asked, Bem Brasil shall support the government and its actions to regulate the company's practices.

11.4. Using or associating Bem Brasil brands, its resources, and services with political party-related actions is strictly forbidden.

11.5. When interacting with any government body, Bem Brasil shall not:

- promise, offer, or give any improper advantage to public agents or a party related to it, that being directly or indirectly;
- finance, pay, sponsor, or subsidize illegal actions;
- use the individual or legal entity to hide or alter its real interests or use the identity of the beneficiaries of such actions.



12

Relations with Society

12.1. Bem Brasil is committed to society by valuing people, respecting governmental and non-governmental institutions, and taking action to protect the environment and people's health.

12.2. Donations, sponsorships, and tax incentives to support culture and social development are actions taken by the company as per the guidelines described in its policies and internal procedures.



13 *Rights, Duties, and Disciplinary Measures*

13.1. Rights and duties described in the Code of Ethics and Standards of Professional Conduct are an extension of corporate relations amongst Bem Brasil employees and, as such, shall be thoroughly followed and respected by everyone, regardless of their role or hierarchical level.

13.2. Any behavior which represents misconduct or non-compliance with the guidelines described herein shall be reported immediately. Bem Brasil safeguards the identity of the person who reported such behavior and establishes, through its policies, preventive measures against retaliation.

Reports can be filed as follows:



1. Contact Internal Audit Team

2. Contact Bem Brasil Ethics Channel:

**0800 750 5560;
www.bembrasil.ind.br**

13.3. As per the Report Channel Procedures (POP-ADM-01), Bem Brasil safeguards the identity of the person who reported such behavior and suppresses retaliation.

13.4. Everyone has the duty and responsibility to report any illegal action, misbehavior, criminal offense and violations of regulations described herein, as well as anti-corruption legislation.

13.5. Should there be any report, the Ethics Committee shall be responsible for receiving, investigating, creating action plans, as well as defining disciplinary measures, as per the Report Submission and Handling Procedures (POP-AOM-01). Such include: verbal warning, written warning, fines, agreement termination, or dismissal.

13.6. Improper behavior is followed by disciplinary measures and recurring improper behavior is considered.

14. Distribution

Electronic: through the management system and document control.

Printed: as per the management system and document control.

15. Attachments

Attachment 1 - Code of Ethics and Standards of Professional Conduct Terms and Conditions

16. Update History

Version	Date	Update/Comment	Owner
02	01-06-2020	- guidelines and behavior regulations reordered and updated as per the Code of Ethics and Standards of Professional Conduct.	Daniela Guimarães
03	05-05-2022	- Item 1: Letter from the President updated; - Item 2 updated taking into account the interactions between Bem Brasil and the government; - Value: Care for the Environment added; - Items 3, 4, 5, 6, 7, 9 10, 11, and 13 updated.	Alfredo Marques / Daniela Guimarães



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