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FALM
Fundação André e Lucia Maggi

Ethical Code of Conduct

The background features a pattern of orange hexagons and lines, some solid and some outlined, scattered across the white page. The hexagons vary in size and are arranged in a somewhat organic, non-repeating pattern. The lines are thin and connect some of the hexagons, creating a network-like structure. The overall aesthetic is clean and modern, with a focus on geometric shapes and a warm color palette.

Ethical Code of Conduct

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1. DEFINITIONS, TERMINOLOGY AND ACRONYMS

For the purposes of this document, on the subject at the Company, the following are **conceptualized** as:

- **FALM / Foundation or company:** Term used for the abbreviation of the André e Lucia Maggi Foundation's Corporate Name, covering the head office and its respective branches.
- **AMAGGI or Sponsor:** Term covering all business units and their respective branches, and subsidiary, affiliated and controlled companies that make up AMAGGI.
- **Stakeholders:** Publics, groups or individuals that influence and/or are influenced by the organization's activities, through their opinions or actions: direct and indirect beneficiaries, advisors, employees, volunteers, suppliers, partners, government, community, among others.
- **Hospitality:** Benefits offered or received with the aim of strengthening relationships with partners such as: accommodation, travel expenses and/or tickets or invitations to seminars, congresses, workshops, lectures, presentations, parties, concerts, lunches, dinners, cocktails, events, among other activities.
- **Gifts:** Institutional item, distributed or delivered as a courtesy, advertising or publicity with no commercial value or with a market value below BRL 300.00 (three hundred) and containing the company logo, such as agendas, notebooks, calendars, key chains, pens, etc. Its distribution or delivery must be carried out in a generalized and impersonal way.
- **Public Agent:** According to Law No. 8,429/1992, anyone who exercises, even temporarily or without remuneration, by election, appointment, hiring or any other form of investiture or bond, mandate, position, employment or function in any of the powers of Union, the states, the Federal District, the municipalities, the territory, a company incorporated into the public patrimony or an entity for whose creation or funding the treasury has contributed or competes with more than fifty percent of the patrimony or annual revenue. And yet, candidates for public office in all instances (federal, state or municipal and in the Executive, Legislative or Judiciary branches).
- **ISP / Private Social Investment:** Private Social Investment is the voluntary transfer of private resources in a planned, monitored and systematic manner to social, environmental, cultural and scientific projects of public interest.

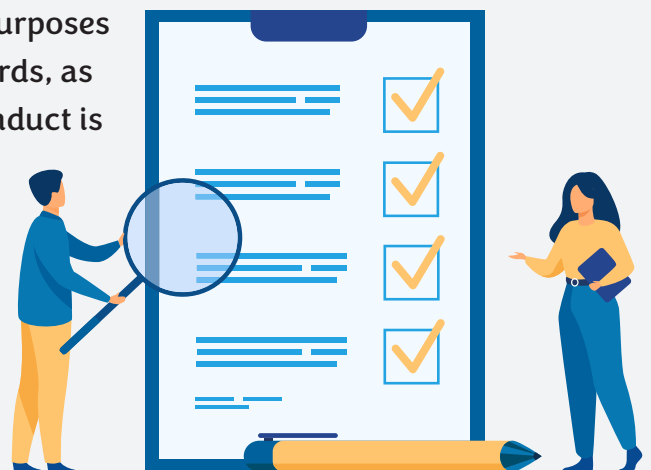
→ **ODS / SDG:** Sustainable Development Goals –global agenda adopted during the United Nations Summit on Sustainable Development in September 2015, consisting of 17 goals and 169 targets to be achieved by 2030 and which can be divided into four main dimensions, namely: Social, Environmental, Economic and Institutional. Further information can be found on <https://www.estrategiaods.org.br/o-que-sao-os-ods/>.

→ **Global Sustainability Positioning:** Plan developed by AMAGGI, which addresses topics such as combating deforestation and managing the responsible soy chain by 2025. It is divided into four strategic blocks, as follows: Growing with the locality, improving the company’s Governance and Management, promoting a sustainable value chain and debating the present and the future.

2. INTRODUCTION

The André and Lucia Maggi Foundation respects the applicable legislation and is fully committed to the adoption of ethical standards in the conduct of its activities. The same commitment shown by the organization is also required of directors, employees, volunteers, suppliers and other interested parties. It is essential for everyone to know that the Foundation does not tolerate misconduct and/or any type of violation or breach of legal obligations and/or internal rules.

The Foundation is committed to carrying out its purposes with integrity and with the highest ethical standards, as well as respecting applicable legislations. This conduct is responsible and aims to ensure the continuity of the Foundation. The Foundation’s Code of Ethical Conduct reflects its values, its mission, its principles and, on a daily basis, must be followed by its board members, employees and volunteers, in addition to holding a reference document for all public listed as “stakeholders”.

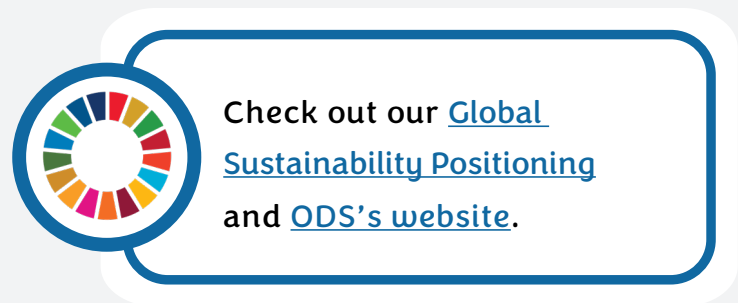


3. ABOUT US

The Foundation was founded in 1997 with the mission of contributing to the development of fairer and more sustainable communities. It is responsible for managing AMAGGI's Private Social Investment (ISP) and, through the direct execution of programs, projects and social actions that promote support for other social institutions, invests its resources in local and human development and contributes to the SGD (Sustainable Development Goals) and AMAGGI's Global Sustainability Positioning.

The Foundation's financial income consists of donations made annually by its founder and sponsor company AMAGGI, in addition to income from the results of activities, the usufruct that were constituted to them, the income from bonds, shares or financial assets arising from operations of contracted credit, donations of any nature intended for them, subsidies, endowments, contributions and other aid stipulated in favor of the Foundation's by individuals, public or private institutions, national or foreign, among other possible incomes.

As provided for in AMAGGI's Private Social Investment Policy, the Foundation does not have a line of action in the form of **sponsorship and support for events** of any nature; however, it can support social projects on a timely basis with financial resources, respecting the delimitation of municipalities and the focus of action already established, in addition to paying attention to the budget planned annually for this purpose.



3.1. Mission, Vision and Values

Mission

Contribute to local and human development.

Vision

Transform peoples and communities for sustainable development.

Values

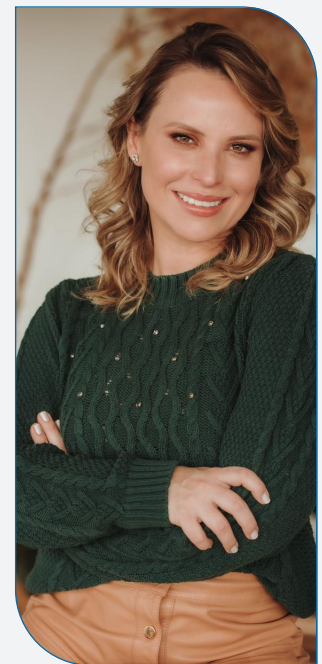
- **Integrity:** To be ethical, fair and consistent with what it thinks, says and does;
- **Socio-environmental awareness:** Promote culture, and environmental and social education;
- **Simplicity:** Focus on the essential, aiming to achieve significant results;
- **Humility:** Respect all peoples, and their diversity of ideas and opinions;
- **Participative management:** Encourage stakeholder participation and engagement in the Foundation's projects;
- **Commitment:** "Fly the flag", be passionate and proud of the Foundation's work and strive for its success;
- **Pioneering:** Value creative, innovative, participative, bold, talented and enthusiastic peoples, who make the difference;
- **Respect for stakeholders:** Cultivate good relations, with dialogue and transparency.

3.2. Message from our Leadership

We are the André and Lucia Maggi Foundation, a non-profit institution responsible for AMAGGI's Private Social Investment (ISP), the largest Brazilian grain and fiber company.

We believe that, in order to fulfill our mission, we must always work focused on improving and expanding our actions, acting with ethics, integrity and compliance, after all, this is the conduct that gives purpose and meaning to our work.

Our Code of Ethical Conduct is a normative and guiding manual that needs to be constantly consulted and practiced by everyone who interacts with us. This Code has an educational and disciplinary character, and it is here that we present the ethical conduct we aim for, from our directors, employees, volunteers, partners, suppliers and others involved in the face of different situations.



Belisa Maggi

Presidente da FALM

We count on everyone to fulfill what is written here and together we can transform communities, generate real and tangible values for society, contributing to the creation of a strengthened local territory.

4. ABOUT THE FOUNDATION'S CODE OF ETHICS AND CONDUCT

The Foundation's Code of Ethical Conduct brings together the guidelines and principles that must be observed and adopted by all the stakeholders that the Foundation interacts with, reflecting its cultural identity and the commitments assumed.



1. Provide guidance to all stakeholders with whom it relates, reinforcing the expected conduct in line with its values and principles;



2. Give proper treatment to ethical conflicts and misconduct;



3. Encourage ethical and transparent behavior in all established relationships;



4. Replicate the moral and conduct principles that have been at the heart of the organization's culture since its creation (1997), whether in conducting its activities with the communities where it operates, in daily responsibilities or in the relationship with internal and external audiences.

For the Foundation, ethics is doing what is right. The practice of its commitments generates respect and consolidates people's trust, solidifying its performance.

All directors, employees, volunteers, partners and other interested parties are responsible for knowing, accepting, respecting and disclosing information about the Foundation's Code of Ethical Conduct, in addition to ensuring strict compliance with its provisions. They must also remain attentive to the preservation and detection of possible violations of this Code, reporting any violation to the Foundation.

The situations detailed in this document allow you to evaluate the main themes and risk factors regarding ethical conduct issues, but do not necessarily detail all the doubts or dilemmas that may arise in daily life.

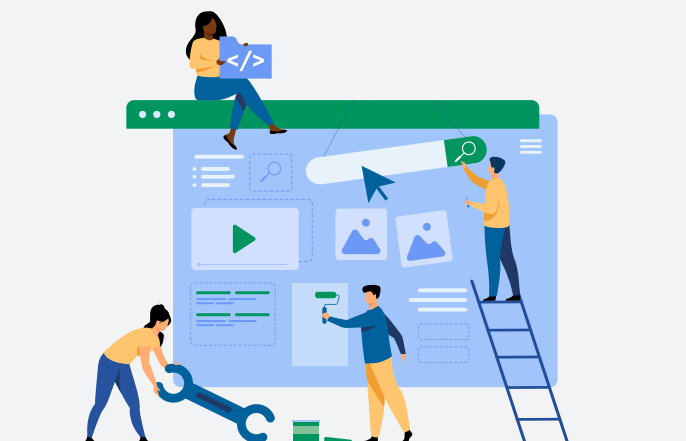
We reiterate the importance of permanent dialogue directly with the management of the Foundation or through the Confidential Channel which, in addition to being confidential, is safe and impartial to receive any report so to improve our work environment.



5. WORK ENVIRONMENT AND PROFESSIONAL DEVELOPMENT

We are all responsible for ensuring a harmonious working environment, with relationships based on cordiality, discipline, respect and trust.

Relationships must be aligned with the values of the Foundation and guided by mutual respect, maintaining the commitment to establish a favorable climate for the professional fulfillment of employees, within a productive, welcoming, diverse, healthy, safe, innovative and free of expression work environment.



The Foundation expects its employees to use social media responsibly, with zeal and ethics, observing the organization's guidelines and other policies and especially when wearing a uniform, badge or any symbology linked to the Foundation.

The content of any interview, online broadcasts, public exposure or contact between employees and the press involving the Foundation must be submitted and mediated by the organization's Communications area.

Whether indoors or outdoors, as well as participating in training, events or socializing with other employees, the employee must behave in accordance with the values of the organization and its corporate image. All business trips, as well as participation in lectures, presentations at public events or external meetings must follow the rules established in internal rules and procedures in force and duly authorized by the immediate manager.

5.1. Equality

We value diversity, without discrimination of any kind, whether based on race, color, political conviction, gender, religion, sex, sexual orientation, age, place of birth, disability, among others.

In the recruitment, selection and promotion processes, candidates must be evaluated solely on the basis of their skills and ability to meet and adapt to the expectations of the position, and decisions based on prejudice, favoritism or even privileges of any nature are not accepted.



We guarantee equal opportunities and seek to develop lasting, quality relationships based on respect and trust.

We act with transparency and agility in the relationship with our stakeholders, honoring our commitments.

We disapprove of any form of embarrassment and intimidation, such as verbal, physical or psychological violence, as well as any forms of harassment, which are unacceptable.

6. HUMAN RIGHTS

We are committed to respecting Human Rights, based on the Universal Declaration of Human Rights of 1948 and the Fundamental Conventions of the International Labor Organization. Thus, we are committed to providing a safe and healthy work environment for our employees, valuing the physical and mental integrity of all those directly or indirectly involved in our activities, ensuring the application of the provisions of the Consolidation of Labor Laws, in addition to offering a range of benefits and fair remuneration to our employees. We are also committed to respecting Human Rights in the relationships we establish with communities, social organizations and other stakeholders.



The ethical conduct we undertake extends to relationships with all stakeholders, including communities, suppliers and partners. We repudiate and do not tolerate forced labor or labor in conditions similar to slavery, child labor, sexual exploitation, human trafficking, or any degrading or illegal action. In order to mitigate risks of human rights violations, we carry out due diligence during the selection of suppliers and subcontractors. At the same time, we instituted internal and external auditing routines to ensure the conformity of the Foundation's activities in relation to the best practices on the subject.

This document is the André and Lucia Maggi Foundation's property; therefore, it is forbidden to reproduce or misuse it in any manner, including for personal gain. To use it outside the company's limits, formal approval must be requested from authorized managers.

The Foundation is dedicated to establishing a harmonious and integral relationship with the communities in which it operates, respecting the culture and tradition of traditional, indigenous and quilombola peoples, in addition to promoting the well-being of the population through sustainable development in the regions where it is present.

7. SHAREHOLDER COMMITMENT

Our supplier identification and contracting process is fair, objective and based on technical, professional and transparent criteria, in addition to demanding compliance with any and all legal, labor, socio-environmental, occupational safety and human rights issues.

Relationships with suppliers, service providers, social organizations and partners are guided by mutual respect and integrity.



The Foundation practices and requires from its suppliers, service providers and partners, an ethical performance and repudiates work analogous to slavery or degrading, corruption practices, money laundering, child labor, environmental degradation, unfair competition practices and other practices contrary to principles established in this Code of Ethical Conduct and provided for in the institutional commitments established with society.

7.1. Regulatory Bodies and Government Agents

We operate through policies and practices that combat any form of illicit act and legal non-compliance. The Foundation, in all relationships with public bodies and agents, whether institutional or contractual, assumes standards of conduct based on transparency, legality and ethics, in order to ensure the construction of integral and contributory relationships.

Representatives of public bodies receive professional and impartial treatment, making themselves available to them whenever requested information, data and records that are relevant and substantiated by law.

Any act that can be configured as bribery, corruption, favoritism, extortion, kickback, concussion, money laundering, administrative improbity, competition, or other crimes against the economic and tax order is not accepted by the Foundation.



The Foundation, in the exercise of its activities, undertakes not to grant advantages or privileges to public agents due to their function. It also undertakes to observe and ensure that its directors, employees, volunteers and other interested parties perform their respective activities and attributions in an ethical, integral and responsible manner, observing and complying with all applicable laws and regulations, including, but not limited to any anti-corruption laws.

It is the duty of the Foundation and all those who interact with us to comply with the Anti-Corruption Law No. 12,846/2013 and other legislation in force in the country, applicable to its activities, as well as comply with the rules and procedures in force.

8. TRANSPARENCY AND ACTIONS COMMITMENT

We operate with 3 (three) governance principles that guide us:



Ethics

We care for ethics in all our relationships, working and requiring our employees and partners to comply with applicable laws and the Foundation's Code of Ethical Conduct;



Accountability

We promote publicity of our actions, performance indicators and compliance with the law, keeping our stakeholders aware of our commitment and ESG practices – Environmental, Social and Governance.



Transparency

We have transparency as one of our pillars and, therefore, we keep available in our [website](#) information on our performance, reports on the development of actions, programs and projects, as well as information on investments made with the financial resources we manage.

We believe that transparency in actions is fundamental when thinking about the third sector, since institutions assume public commitments to contribute, directly and indirectly, to the communities where they operate. Our [Private Social Investment Policy](#) prioritizes stakeholder engagement to identify the main themes, transparency in communication, encouragement and guidance to partners to improve our actions.

Any charitable, supportive or sponsorship contribution aimed at influencing business decisions or meeting personal, direct or indirect benefits of any nature is prohibited.

8.1. Conflict of Interest

The conflict of interest is characterized when any interested party uses its influence or commits acts with the intention of benefiting private interests, to the detriment of the collective interests of the Foundation, which may cause damages or losses to the institution.

At the Foundation, when carrying out our professional or even personal responsibilities, we ensure that there is no conflict or perception of conflict of interest.

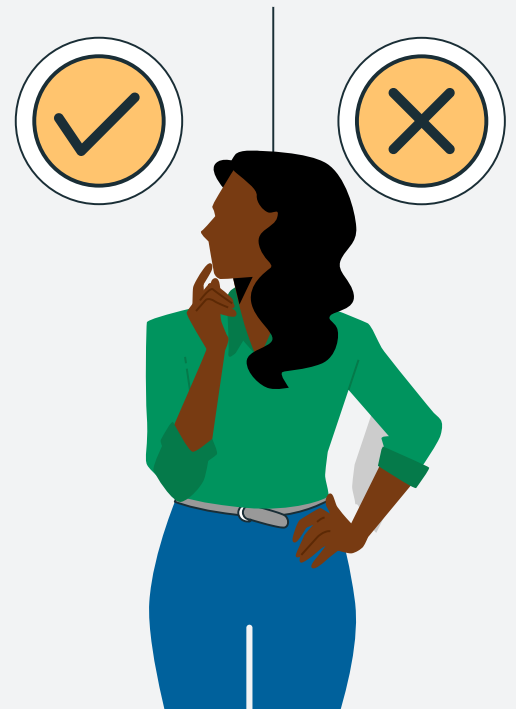
The occupation of positions in external entities by employees must also be previously evaluated for possible conflicts of interest. The assessment of the possible existence of a conflict of interest must be forwarded to the person responsible for Compliance and only after its opinion and with the authorization of the Executive Board can the employee confirm his/her participation.

The intention to hire, transfer or promote people with a degree of kinship to the same area, other areas at the Foundation or areas at AMAGGI with direct links to the

Foundation, must be informed by the Human Resources area and/or immediate manager to the Compliance representative which will issue an opinion for decision-making by the Executive Board of the Foundation.

The performance of external professional activities, in parallel with the work at the Foundation, except for those of an academic nature, will only be allowed upon the declaration of a conflict of interest, the analysis of the person responsible for Compliance and the approval of the Executive Board of the Foundation.

Links (such as suppliers or service providers of the Foundation) of any party involved or through family members will only be accepted if the position the employee holds does not give them the possibility of influencing transactions or allowing access to privileged information, or as long as respecting the entire Brazilian legal framework, as well as the free-market rules and also following all the norms established in the Foundation's policies.



All conflict-of-interest analysis are carried out by the person responsible for Compliance and validated by the Foundation's Executive Board.

9. TREATMENT OF INFORMATION

Due to the nature of our activities, we use knowledge, data, always including personal data and information, whether methods, techniques, technologies, systems, software or others. To this end, the Foundation has a [Privacy Policy](#) which establishes the criteria and mechanisms for collection, storage, treatment and service to data subjects, in accordance with the General Data Protection Law (Law 13,709/18) and other applicable laws and regulations.

Our privacy policy can be found [on our website](#).



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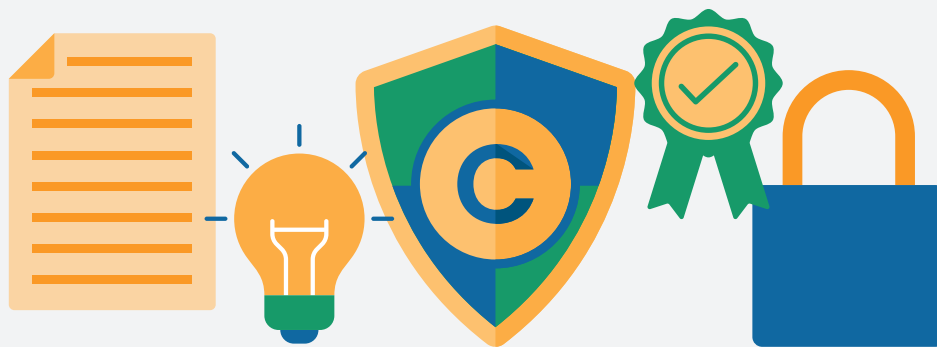
All directors, collaborators, volunteers and other interested parties must guarantee the protection of non-public information that they may have access to while working for the Foundation. This confidential information can only be shared with people outside the Foundation in accordance with internal policies and applicable legislation. Specifically, regarding personal data, the Foundation respects the privacy of its directors, employees, volunteers, beneficiaries and other interested parties, using the data obtained only for legitimate purposes, always observing the applicable legislation and related internal policies.

10. PATRIMONY USE AND PROTECTION

It is everyone's responsibility to ensure the proper use and conservation of the organization's assets placed in their custody, as we cherish the conservation of the Foundation's assets, which include facilities, machines, equipment, systems, furniture, brands, patents, technologies and others.

The assets, equipment, facilities and other assets of the Foundation are made available to employees, partners or representatives appointed for their exclusive use in the organization's activities after approval by the manager or responsible body.

The Foundation reserves the right to inspect, monitor and control the use of these assets at any time, including email systems and other forms of electronic communication. Any information generated, received or stored in one of these systems is the property of the Foundation and employees are therefore prohibited from using the Foundation's assets to promote inappropriate content and/or unrelated to their work.



11. SUSTAINABILITY

The Foundation develops projects and actions with the premise of strengthening sustainable local development, observing the following practices:



We developed our actions in compliance with current environmental legislation and the guidelines of the Social and Environmental Policy aligned with AMAGGI's Global Positioning on Sustainability;



We encourage the exercise of citizenship and volunteer work in the communities in which we operate;



We respect the culture and traditionality of the communities in which we operate, identifying aspirations and potentialities and jointly contributing to the promotion of actions that lead to territorial development and the improvement of their local quality of life;



Through our actions, we work towards the preservation of the environment, maintaining the health of ecosystems and the environmental services provided by it;



We support policies and practices that promote the country's sustainable development and social well-being;



We encourage the adoption of good socio-environmental responsibility practices for all our stakeholders.



12. GRATING OR RECEIVING ADVANAGES, BENEFITS, GITS AND HOSPITALITIES

No granting or receiving of undue advantages, directly or indirectly, is allowed to any person or organization, whether through administrators, employees or partners.

It is everyone's duty to comply with the basic principles in the treatment of gifts and hospitality. Are they:

- No benefits, gifts or hospitality may be given or received to obtain any undue advantage;
- Observe all legal criteria in force on the action without disregarding the incidence/payment of taxes, if any;
- It is not allowed to generate any negative perception that will affect the image of the organization or interested parties (stakeholders);
- When it comes to entertainment, it must have a connection with the purpose of the Foundation.

13. CONDUCT IN INTERACTING WITH THE PUBLIC SECTOR AND OTHER EXTERNAL PUBLIC

For the Foundation, it is essential that the interactions, when carried out, meet the following guidelines:

- To not offer payments, favors or undue advantages to any interested party and public agents in order to obtain advantages, benefits, gains, or influence decisions that may be understood as bribery, corruption or other illegal practices;
- Immediately notify the person in charge of Compliance cases in which there is a request or proposal for payments, benefits, or any other undue advantage by representatives of any interested party, including, but not limited to, politically exposed persons (PEPs) and public officials;
- It is prohibited for directors, employees, volunteers and other interested parties, on behalf of the Foundation, to accept, offer or give gifts, favors, gifts and courtesies that imply any obligation on the part of the recipient, or even

that give rise to preferential treatment in the obtaining contracts, services, goods or business;

→ Entertainments sponsored and/or promoted by third parties, with expenses paid by the Foundation's partner/beneficiary organizations, suppliers and other stakeholders, may be accepted when there is a real opportunity to develop and/or maintain a relationship with the Foundation's partnerships, when have also been extended to professionals from other organizations, and provided that it is formally sent for evaluation, through physical or electronic correspondence and approved by the executive board of the Foundation, in addition to following the rules established in the policies, rules and internal procedures in force;

→ Offering and/or receiving cash gifts for any reason is prohibited;

→ It is prohibited to offer and/or accept payments, services or advantages that have the objective of influencing the Foundation's stakeholders on any commercial negotiation;

→ Objects received as an award that represent, directly or indirectly, tribute or distinction to the Foundation, must be informed to the Communication area for their proper destination.

14. VIOLATIONS, REMEDIATION MEASURES FOR IMPROPER CONDUCT AND CONFIDENTIAL CHANNEL

All communication of violation of current legislation, the Foundation's Code of Ethical Conduct, as well as policies and procedures, will be treated with confidentiality, except for those in which there is a legal obligation to inform the authorities.

The Confidential Channel must be used in accordance with the principle of good faith, that is, its use for intrigue, slander, purposefully reporting lies or retaliation of any nature is not tolerated.

Whoever reports any misconduct is guaranteed security against all types of internal retaliation.

Any suspicion of behavior deviation or legal violations or even of the rules established herein must be reported to the Confidential



Channel. Everyone's commitment to the present code is essential for the Foundation to achieve its purposes in an ethical and transparent manner, thus providing an increasingly honest, safe and sustainable work environment.

The Confidential Channel is a tool available 24 hours a day, 7 days a week, for all of the Foundation's stakeholders. The channel system itself provides information on how potential misconduct should be reported.

You can access it via the telephone 0800 647 0004 or also via the [website](#).

The Foundation has an Ethical Conduct Committee in which it has the mission of advising the directors in the process of conducting the topics related to this document and reporting them to the organization's Board of Trustees, including proposing improvements related to their area of activity, in order to check greater efficiency and quality to the decision-making of the Foundation and also to ensure that activities are conducted in accordance with current legislation, with this document and other policies and/or internal controls.

All complaints are analysed and investigated by the person responsible for Compliance and validated by the Ethical Conduct Committee and reported to the Foundation's Board of Trustees. The relevant cases are discussed with the Executive Director and the necessary measures are adopted in accordance with internal policies.

15. GENERAL AND EXCEPTIONAL RESPONSIBILITIES AND GENERAL PROVISIONS

The Foundation's Code of Ethical Conduct seeks to be as comprehensive as possible, but unforeseen situations may arise. This Code enters into force on the date of its formalization, and must be distributed to its directors, employees, volunteers and other interested parties.

No director, employee, volunteer or any other interested party may claim ignorance of the guidelines established in the Foundation's Code of Ethical Conduct, under any circumstances or under any allegation.

ANNEX

Term of responsibility and commitment to adhere to the Foundation's Code of Ethical Conduct

I acknowledge that I received a copy of the Foundation's Code of Ethical Conduct and had the opportunity to ask questions about the issues described therein. I understand it is my responsibility to respect the guidelines set out in this code, as well as to keep it in my custody.

I also understand that the code was developed to serve as a guide for the relationships established with the Foundation, encouraging all interested parties to conduct ethical and transparent work.

Full Name

Organization/Company

Type of relationship with the Foundation:

- Advisor
 - Employee
 - Volunteer
 - Beneficiary
 - Partner
 - Supplier / Service Provider
 - Other:
-

Date

Signature

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Fundação André e Lucia Maggi

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