



IMC CODE OF CONDUCT AND ETHICS

1. PRESENTATION

This Code of Conduct and Ethics ("Code") was approved by the Board of Directors of International Meal Company Alimentação S.A. ("IMC") and applies to all its subsidiaries and controlled companies in Brazil and abroad (jointly, "IMC Group").

The Code is a formal statement of the IMC Group on the ethical principles and standards of professional conduct that should guide the activities of all its employees (management, directors, officers, employees, interns and contractors), without distinction of position (jointly, "Protagonists"), in their relationships with other Protagonists and with shareholders, partners, customers, suppliers, the community and government agencies in general.

Self-employed professionals, consultants, agents and sales representatives acting on behalf of the IMC Group must adopt the same high ethical principles and standards of conduct when working on behalf of the IMC Group.

The IMC Group also requires suppliers, customers and partners to comply with the ethical principles and standards of conduct set out in this Code in their relationships with the IMC Group.

Above all, this Code is designed to help you understand the IMC Group's standards of ethical conduct and business practices and to encourage awareness of ethical and legal issues you may encounter when carrying out your responsibilities.

This Code is your guide to conduct and ethics based on the IMC Group's standards and principles, and you, as a Protagonist, must comply, demand that all other Protagonists comply and ensure that suppliers, customers and partners comply with all the terms of this Code.

The actions of any Protagonist may directly or indirectly affect the reputation and integrity of the IMC Group, so it is essential that you review this Code in detail and know its content and provisions.

2. GENERAL ETHICAL PRINCIPLES

The following general principles should guide all actions and conduct of IMC Group Protagonists:

- Respect for the dignity and rights of each individual;
- Strict compliance with the laws and the IMC Group's internal policies;
- Honesty and integrity, pursuing the same goals of the IMC Group;
- Conscientious work, with integrity, diligence and loyalty to the interests of IMC.
- Work environment free from any kind of discrimination and respectful of diversity;
- Focus on customers and on the quality and excellence of products and services;
- High performance in projects developed at the IMC Group;
- Confidentiality in the handling of the IMC Group's information;
- Responsibility in preserving the image of the IMC Group.

3. MAIN REQUIRED CONDUCTS

At all times during your career in the IMC Group, you must:

- Ensure that there are no conflicts between personal and professional interests;
- Report conflicts of interest to the hierarchical superior or the Ethics Committee of the IMC Group;
- Comply with all laws, regulations and policies of the IMC Group, when applicable;
- Always seek guidance from a superior in case of doubts about laws, procedures and policies of the IMC Group;
- Always seek guidance from the Ethics Committee in case of doubts about the IMC Group's Code of Conduct and Ethics;
- Report any violation of this Code, supported by evidence, to the appropriate manager or channel, showing a spirit of vigilant cooperation with IMC; and

- Be personally responsible for adhering to this Code and comply, demand that all other Protagonists comply and ensure that suppliers, customers and partners comply with all the terms of this Code.

4. MAIN PROHIBITED CONDUCT

Without prejudice to anything else stipulated in this Code, Protagonists are forbidden to:

- Use inside information that they have access to by virtue of their position, function or role in IMC for personal benefit or for the benefit of others.
- Accept or request any commission, rebate, economic compensation and/or personal favor, as a result of their position or role in the IMC Group.
- Accept gifts offered by anyone based on their position, function or role in the IMC Group, in disagreement with the Policy for Gifts and Presents.
- Speak publicly on behalf of the IMC Group in any media outlet, including social media, when not authorized.
- Associate or link IMC Group brands to personal behavior that may directly or indirectly affect the image, reputation and/or integrity of the IMC Group.
- Make political contributions on behalf of the IMC Group and/or with the IMC Group's resources.
- Omit any conflict between personal interests and the interests of the IMC Group.
- Make donations to charities and/or non-governmental organizations (NGOs) in violation of the applicable policies.
- Discriminate against anyone because of their gender, culture or ethnicity, race or color, social status, religion, age, marital status, sexual orientation, political or philosophical beliefs, permanent or temporary physical characteristics, disabilities or any other reason.
- Commit or tolerate moral or sexual harassment, which may harm the personal integrity of those who become targets.
- Punish or retaliate against those who report the occurrence of harassment, discrimination or any violation of this Code in good faith to the competent reporting channels.
- Take with them, upon leaving IMC, copies of information, processes, methodologies and software, among others, belonging to IMC even if they have been developed by the employee in his/her work environment.

- Disclose on social media IMC proprietary information, as well as disseminate rumors or tarnish the image of management, employees or the organization.

5. COMPLIANCE WITH LAWS, RULES AND REGULATIONS

The IMC Group requires you to comply with all laws, rules and regulations applicable in the countries where IMC and its subsidiaries and controlled companies do business.

Violation of a domestic or foreign law or regulation may subject you or IMC to civil and/or criminal liability, as well as government sanctions.

Compliance with all laws, rules and regulations is not always intuitive. To comply with the law, you must have sufficient knowledge of the national, state and local laws that affect your work in the IMC Group in order to be able to identify possible problems and obtain appropriate guidance on the right way to proceed.

When there is any doubt as to the legality of any proposed activity, you should seek guidance from your hierarchical superior or the Legal Department of the IMC Group.

6. CONFLICTS OF INTEREST

The IMC Group expects you to use common sense and the highest ethical standards in your professional activities, as well as in your private activities.

You must avoid, and, when it is not possible to avoid, you must report to your supervisor or the Ethics Committee any activity, arrangement, investment, business interest or any other situation that may actually or potentially cause you to place your own interests, or the interests of others, above your obligations to the IMC Group.

The IMC Group prohibits conflicts of interest, except as approved by the Audit Committee, with respect to conflicts of interest and transactions with related parties linked to directors, director candidates and officers; or as approved by senior management, with respect to conflicts of interest related to other persons.

Although it is not possible to describe or foresee all the circumstances that may involve a conflict of interest, a conflict of interest may arise whenever you act in such a way or have interests that may hinder the development of your work in an objective or effective manner or when you (or a "direct relative", as defined below) receive inappropriate personal benefits as a result of your position in or relationship with the IMC Group. Depending on the circumstances, conflicts of interest may arise when you (or a direct relative or an entity with which you have close cooperation):

- Have a financial interest in competitors, customers, suppliers of the IMC Group or third parties negotiating with the IMC Group.
- Have a consulting, managerial, ownership or employment relationship with a competitor, customer, supplier or third party negotiating with the IMC Group.
- Acquire properties, leases, patents, trademarks or other assets or rights in which the IMC Group has or you know or have reason to believe, at the time of acquisition, that the IMC Group is likely to have an interest related to the IMC Group's business.
- Nominate a relative or close friend to be hired by IMC in order to verify the existence of any impediment.

A "direct relative" includes your spouse, parents, stepparents, children, stepchildren, siblings, father-in-law, mother-in-law, sons-in-law and daughters-in-law, brothers-in-law, sisters-in-law and anyone (other than a tenant or employee) who lives with you. It also includes common-law spouses and romantic relationships (boyfriend/girlfriend, etc.).

In any case where there is an actual or potential conflict of interest, you must immediately report the nature of the conflict to a hierarchical superior or the Ethics Committee.

6.1 Gratuities, Gifts and Presents

You and your direct relatives are prohibited from suggesting, giving, promising, requesting, accepting or offering any form of unofficial payment, illicit gratuities, bribes, contributions and favors of any kind, discounts, barter or any other improper payment or gratuity in connection with any corporate expenditure or sale of products or services, in exchange for or as facilitation of IMC's business, operations or activities, or in order to obtain undue advantage for yourself or

others. If you receive such an offer, please clearly state that your personal professional ethics and Company policies do not allow you to accept any form of undue advantage. In this case, politely interrupt any conversation or negotiation, leave the room (if applicable) and immediately contact a hierarchical superior or the Ethics Committee.

The acceptance of gifts and presents must be in full compliance with the Policy for Gifts and Presents.

6.2 Concomitant Paid Activity

Protagonists must devote their full time and attention to the IMC Group's business during normal business hours and in any additional period required by the Company, in accordance with the law. Outside business activities can easily create conflicts of interest or reduce productivity and efficiency. For these reasons, you must avoid outside business activities that may consume time and efforts that should be devoted to your professional activity in the IMC Group.

Although the IMC Group encourages activities that are important to Protagonists, as well as their involvement in the community, special care must be taken not to compromise their duties to the Company. Therefore, Protagonists must inform the Ethics Committee of the nature of any outside activity for which they are remunerated. Protagonists must formally inform their direct manager and the Ethics Committee of their intention to take on activities in other organizations and await its analysis and opinion.

6.3 Political and Other Outside Activities

Before running for or being appointed to public office, you must notify your hierarchical superior or the Ethics Committee to know the IMC Group's position if you win the election for or are appointed to public office. You must obtain written approval from the Ethics Committee.

Subject to the limitations imposed by this Code, Protagonists may engage in outside activities that do not interfere with the performance of their responsibilities or otherwise conflict with the interests of the IMC Group. You should seek guidance from a hierarchical superior or the

Ethics Committee before engaging in activities that may be considered controversial or sensitive. You shall not use your position or role in the IMC Group or any of its equipment, supplies or facilities to do activities that are not inherent in your duties in the IMC Group, unless the Ethics Committee has approved such use in writing.

Protagonists should not solicit contributions or other support from colleagues, or distribute non-work-related material to colleagues during business hours or in areas where work related to the IMC Group is being performed.

7. PROTECTION AND PROPER USE OF COMPANY ASSETS

You are personally responsible for protecting IMC Group assets from misuse or misappropriation. IMC Group assets include tangible assets, such as products, equipment and facilities, as well as intangible assets, such as business opportunities, intellectual property, trademarks, trade secrets and business information, as well as any proprietary information of the IMC Group known by virtue of being a Protagonist.

7.1 Theft/Misuse of IMC Group Assets

IMC Group assets may only be used for business and other purposes approved by the IMC Group itself. You must not knowingly take, use or misappropriate these assets for personal use, for use by another person or for an inappropriate or illegal purpose.

You must not remove, dispose of or destroy anything of value belonging to the IMC Group, including physical items and electronic information, without the IMC Group's prior approval or in breach of the appropriate internal policies and procedures.

7.2 IMC Group Confidential Information

If you are entrusted with confidential or proprietary information (about the IMC Group, its suppliers, customers or other components), you shall not disclose such information outside the

scope of your authorized functions in the IMC Group, either during or after business hours, except with the written permission of the IMC Group or as otherwise required by law. You may not use confidential information for your personal benefit or for the benefit of persons or companies outside the IMC Group.

Protagonists must request authorization from an officer before using non-public information or know-how in external activities or publications, such as classes, congresses, lectures, academic works, books, magazines and social media (networking, sharing videos or photos, blogs and microblogs), since its disclosure or adulteration may cause financial loss, benefit competitors or generate negative impacts on the business or image of the IMC Group.

Confidential information includes all non-public information known by virtue of being a Protagonist. It includes, among others:

- Private information that may (i) be used by competitors, suppliers, vendors, joint venture partners or others, (ii) be of interest to the press or (iii) harm the IMC Group or its customers, if it is disclosed;
- Private information about the financial situation, prospects or plans of the IMC Group, its marketing and sales programs, and research and development information, as well as information regarding mergers and acquisitions, stock splits and divestitures;
- Private information regarding possible operations with other companies or information about customers, suppliers or joint venture partners of the IMC Group to whom the IMC Group has a duty of confidentiality; and
- Private information about discussions and deliberations between Protagonists regarding problems and business decisions.

7.3 IMC Group Network Use and Data Integrity and Security

The IMC Group reserves the right to monitor or analyze any and all data and information contained in the computer or any other electronic device made available by IMC Group to any Protagonist, in addition to the right to monitor or analyze the Protagonists' use of the Internet,

the IMC Group's intranet, corporate e-mail or any other electronic communications systems without prior notice.

Access to IMC Group systems will be revoked and disciplinary action may be taken if these systems are used to commit illegal acts or violate the provisions related to non-discrimination, harassment, pornography, enticement or other situations set forth in this Code or in applicable laws, rules and regulations.

To maintain the integrity of the systems and protect the Company's network, electronic and communication equipment must be used in accordance with IMC Group internal policies and rules.

8. BUSINESS PRACTICES

8.1 Fair Trading

You must negotiate fairly with suppliers, customers, competitors and employees of the IMC Group. You must not take advantage of them through manipulation, concealment, abuse of inside information, error inducement, misrepresentation of material facts or any unfair trading practice.

Information about IMC suppliers, customers, competitors and employees must be used ethically and in accordance with the law. Under no circumstances shall information be obtained by theft, illegal entry, blackmail, electronic espionage or deceptive association. Confidential or proprietary information shall not be used if there is a suspicion that such information has been improperly obtained.

You must also respect and protect confidential or proprietary business information of the IMC Group, unless disclosure is necessary to comply with legal requirements, subpoenas, court orders or other duly authorized legal procedure or government investigations. Such information shall not be disclosed without proper authorization and shall be used only for legitimate business purposes.

Customers and potential customers are entitled to receive accurate information regarding prices, capacity, terms and schedules. The IMC Group strives to produce fair, accurate and lawful advertisements. False or misleading statements to sell or market IMC Group products or services must be strictly avoided. Immediate efforts should be made to correct any misunderstanding that may exist with a customer or potential customer.

8.2 Bribery and Other Corrupt Practices

The IMC Group strictly prohibits the direct or indirect giving or promise of anything of value to any government employee or representative (including state-owned companies), employee or representative of a political party, candidate for public office or any person performing public duties or government functions (including, but not limited to, employees and officers of private companies that provide utility services or have public concessions) in order to obtain or contract business or to secure an improper advantage in any aspect of the IMC Group's business.

As an entity incorporated and doing business in Brazil, the IMC Group is subject to the Brazilian Anti-Corruption Law (Federal Law 12,846, of August 1, 2013), which makes it illegal for IMC, its subsidiaries and people working for or on behalf of it, among other activities:

- Offer any undue advantage to a public authority, either directly or indirectly, including third parties that are related to said public authority;
- Commit acts of fraud or manipulation in bids or contracts with public entities;
- Finance or sponsor any acts prohibited under the law; and
- Interfere in the supervision or investigations of public authorities.

In Brazil, all "facilitation" payments to government officials or employees are strictly prohibited. "Facilitation" payments can be defined as payments to expedite the routine performance of legitimate duties, which may be legal in certain jurisdictions, but are illegal under Brazilian law.

As a parent company of U.S. legal entities, the IMC Group is subject to the U.S. Foreign Corrupt Practices Act (FCPA), which makes it illegal for IMC, its subsidiaries and persons working for or on behalf of IMC to offer, pay, give, promise or authorize the payment of any amount or thing of value, directly or indirectly, to any foreign government official or employee, foreign political party or candidate for foreign public office for the purpose of obtaining or retaining business or

securing an undue advantage, in addition to being subject to equivalent laws in other countries. Under the U.S. Foreign Corrupt Practices Act, improper payments are defined broadly to include direct and indirect (e.g., through agents or self-employed professionals) payments, gifts, entertainment and certain travel expenses. Although local written laws may allow the giving of gifts or the payment of entertainment expenses, the Ethics Committee must approve any such payments in advance.

Any question as to whether a gift or payment would be considered inappropriate under the IMC Group's guidelines or national or foreign laws should be discussed with the IMC Group's Ethics Committee.

Under no circumstances is it acceptable for you to offer, give, request or receive any form of bribe, illicit gratification, reward or incentive.

You may not use agents, consultants, independent contractors or other representatives to do indirectly what you cannot do directly under this Code or applicable law, rules and regulations. When hiring agents, consultants, independent contractors, service providers or other representatives, it is necessary to run adequate background checks and verify business credentials. Some "red flags" to look for include:

- Third parties with relatives or other relationships that may influence the decision;
- Independent contractors or consultants whose reputation is tarnished by bribes;
- History of corruption in the country where the third party is being hired;
- Requests for unusually high commissions;
- A commercial agent or representative who approaches you around the time of signing a contract and suggests a "special arrangement" with an authority; or
- A customer who suggests that an offer from the Company be made through a specific agent or representative.

9. RELATIONSHIP WITH SUPPLIERS

IMC Group suppliers are considered business partners, and as such must share our ethical principles. When hiring suppliers, Protagonists must instruct said suppliers to comply with and

enforce this Code. Suppliers must formalize their knowledge of the content hereof by signing the statement of adherence to IMC's Code of Conduct and Ethics, as per Annex II.

If, for any reason, any supplier does not sign the statement of adherence to IMC's Code of Conduct and Ethics, its hiring, or the continuity of its relationship with IMC, will depend on the express authorization of the Ethics Committee, whose written decision will replace the statement of adherence not signed.

Protagonists must select suppliers exclusively based on quality, price and other criteria commonly accepted by the market (including, but not limited to, logistics and financial and production capacity). The supplier selection processes will promote competition among a wide range of suppliers of goods and services whose characteristics and conditions meet the needs and requirements of the IMC Group, which will be previously established and disclosed before the proposals are presented by the Suppliers.

If any Supplier feels aggrieved by the use of criteria that fit the provisions of this Code, said Supplier has the prerogative to file a complaint with IMC's Confidential Channel, pursuant to Section 17 of this Code.

10. RELATIONSHIP WITH THE MARKET

The actions of IMC Group Protagonists, in their relationship with the market, should be guided by transparency and respect for institutions and investors. All Protagonists must act ethically and in accordance with the law, always promoting free competition in all countries where the IMC Group operates and encouraging this behavior in the market.

The information disclosed to the market by the IMC Group is precise and accurate, allowing the proper monitoring the activities and financial performance of the IMC Group. The disclosure of incomplete or inaccurate information to the market is highly undesirable, so only specifically appointed and expressly authorized persons should communicate any information to the market.

IMC is a publicly held company with shares traded in the Novo Mercado segment on the São Paulo Securities, Commodities and Futures Exchange (“B3: Brasil Bolsa Balcão”). This means that any Protagonist can be a shareholder of IMC, if he/she so wishes. However, by virtue of his or her position or role, said Protagonist may have access to inside information that, if misused, could harm the market and provide an undue advantage to the Protagonist and/or others.

To ensure equitable treatment of shareholders, the IMC Group requires compliance, without exception, with its Securities Trading Policy and its Confidentiality Policy, which reflect the determinations of the Brazilian Securities and Exchange Commission (“CVM”) on the matter. Failure to comply with these Policies not only constitutes a violation of this Code, but may also constitute a crime as defined by law.

11. RELATIONSHIP WITH CUSTOMERS

Our mission is "to work together to exceed consumer expectations". Focusing on our mission, the Protagonists' relationships with IMC Group customers must be based on respect, efficiency, commitment to customer satisfaction and strict compliance with current legislation.

Protagonists should prioritize identifying the needs of our customers and consumers, offering high quality products, exceeding their expectations, providing efficient services in a friendly manner, maintaining the commitment to customer satisfaction, correctly processing their criticism and suggestions, and providing timely and appropriate responses.

12. RELATIONSHIP WITH THE ENVIRONMENT AND THE COMMUNITY

When Protagonists interact with the community during the performance of their professional activities on behalf of the IMC Group, they must always, without exception, stick to the principles set out in this Code, refraining from acting in a discriminatory, unlawful and/or not socially accepted manner.

In addition, IMC and all Protagonists must value the sustainable management of natural resources, avoiding the waste of raw materials and correctly using the inputs at their disposal.

13. RELATIONSHIP WITH THE MEDIA

As a publicly held company with shares traded on B3: Brasil Bolsa Balcão, IMC is obliged and committed to disclosing full, fair and accurate information in all public communications, in compliance with all applicable laws, regulations and rules. In a manner consistent with this commitment, Protagonists, except for the expressly authorized persons and Protagonists, are not authorized to answer questions from the media, analysts, investors or any other members of the public.

If you receive an inquiry from or are approached by the press or any media outlet, you must note the person's name, immediately notify the IMC Group's Marketing area and speak with the head of Media Relations. Phone: (11) 3041-9500.

14. SAFE, HEALTHY AND POSITIVE WORK ENVIRONMENT

The IMC Group is an equal opportunity employer and bases its recruitment, hiring, development and promotion decisions exclusively on a person's ability and potential vis-à-vis the needs of the position and compliance with local, state and federal labor laws.

The IMC Group is committed to a work environment free from bullying; sexual, racial and other types of unlawful harassment; threats; violent acts; and physical intimidation. Abusive, harassing or offensive conduct, whether verbal, physical or visual, is unacceptable. If you believe that you have been harassed or threatened or subjected to physical violence in or related to the workplace, you must disclose the incident to the Ethics Committee by filing a report with the Confidential Channel (see Section 17), which will launch an investigation. Every effort will be made to ensure the confidentiality of the investigation.

The IMC Group will not tolerate the distribution of pornographic, racist, sexist or otherwise offensive materials on IMC Group premises or the use of computers or other equipment owned by the IMC Group to obtain or view such materials. All Protagonists have the duty to immediately

file a report with the Confidential Channel (see Section 17) in order to inform the Ethics Committee of the existence of offensive materials, mainly child pornography, in the systems or on the premises of the IMC Group so that appropriate action can be taken, including notifying the responsible authorities, if necessary.

The IMC Group is committed to providing a drug-free work environment. The illegal possession, distribution or use of any controlled substances on IMC Group premises or in IMC Group functions is strictly prohibited. Similarly, reporting for work under the influence of any illicit drug or using or abusing alcohol or medication in the workplace is not in the best interest of the Company and violates this Code. All Protagonists have the duty to immediately file a report with the Confidential Channel (see Section 17) in order to inform the Ethics Committee of the existence of people, Protagonists or not, on the premises of the IMC Group under the influence of any illicit drug or using or abusing alcohol or medication so that appropriate action can be taken, including notifying the responsible authorities, if necessary.

The IMC Group strives to provide a safe work environment that does not endanger the physical integrity of the Protagonists or customers. All damage or concerns about equipment, practices, unsafe conditions or other possible dangers must be reported immediately to an appropriate supervisor or the Ethics Committee by filing a report with the Confidential Channel (see Section 17).

15. ACCOUNTING PRACTICES, BOOKS AND RECORDS, AND DATA RETENTION

It is the IMC Group's policy to maintain fair and accurate books and records and to make accurate disclosures as required by applicable accounting principles, laws, rules and regulations. The accounting records of the IMC Group are used to produce reports for its management and others. Our financial statements and the books and records on which they are based shall accurately reflect all corporate transactions and shall comply with all legal and accounting requirements and our internal control system.

All Protagonists are responsible for ensuring that IMC accounting records do not contain false or misleading entries. We do not tolerate operations not recorded on the books and, in addition to

other responsibilities provided for by law, rules, regulations and internal procedures, we require Protagonists to follow the rules below, in particular:

- All accounting records, as well as reports produced based on these records, shall be maintained and presented in accordance with the laws applicable to each jurisdiction;
- All records must fairly and accurately reflect the transactions or occurrences to which they relate;
- All records must fairly and accurately reflect in reasonable detail the Company's assets, liabilities, revenue and expenses;
- Accounting records shall not contain any false or misleading entries;
- All transactions must be justified by accurate documentation in reasonable detail and properly recorded in the accounting records in the appropriate accounting period;
- All accounting records must comply with generally accepted accounting principles; and
- The internal accounting control system must be adhered to at all times.

Any effort to mislead or coerce the independent auditors or a member of the internal audit team could subject the fraudster and IMC Group to serious legal consequences, including criminal sanctions, and such practice is strictly forbidden.

Falsifying accounting records is a serious transgression, which may result in criminal prosecution, civil action and/or disciplinary action, including termination of employment. If you are authorized to incur expenditures or enter into transactions on behalf of the IMC Group, you must ensure that the applicable records comply with the accounting and acquisition policies and that all transactions are properly recorded.

In keeping with the reporting and record-keeping commitments discussed above, you must accurately and faithfully complete all records used to determine compensation or reimbursement of expenses. This includes reporting worked hours (including overtime), reimbursable expenses (including travel and meals) and sales activity, among other items.

Destroying or altering a document with the intention of damaging the integrity or availability of the document for use in any possible official procedure is a crime. Corporate records may only

be destroyed in strict compliance with internal procedures. Documents relating to any ongoing, imminent or planned litigation, investigation or audit shall not be destroyed for any reason.

If you believe that the Company's records are being tampered with or destroyed, you must report this to a hierarchical superior, the appropriate internal authority or the Ethics Committee.

16. ETHICS COMMITTEE

The IMC Group's Ethics Committee is the body responsible for promoting the principles of this Code among Protagonists and supervising its application. Its activities include the processing of complaints received from Protagonists, the response to inquiries made by Protagonists about this Code and other IMC Policies related to it, as well as the recurring review and updating of the content of this Code.

17. COMPLAINT PROCESSING

It is part of work responsibilities to help comply with this Code. If you are a supervisor, then you are responsible for continuously emphasizing integrity as a performance standard for all employees. Supervisors and all persons to whom others address concerns about matters mentioned in this Code should contact the Ethics Committee so that the concern can be resolved and, if necessary, an appropriate investigation can be conducted.

Protagonists have the duty and obligation to report any violations of this Code and other Company policies of which they become aware, filing a report with IMC'S CONFIDENTIAL CHANNEL.

IMC'S CONFIDENTIAL CHANNEL

From 8:00 a.m. to 5:50 p.m. at

0800 0562 499

24/7 online at canalconfidencial.com.br/imc

Anonymous reports are allowed.

In accordance with the IMC Group's policies and applicable law, no adverse labor action or retaliation may be taken directly or indirectly against any person who reports a concern in good faith or provides assistance or information to the Ethics Committee, management or any other person or group, including any governmental, regulatory or law enforcement agency, investigating or otherwise helping to resolve any issue.

Confidentiality and anonymity mechanisms for reporting concerns are available in IMC's CONFIDENTIAL CHANNEL. However, anonymous information does not satisfy the duty to disclose your possible involvement in a conflict of interest or unethical or illegal conduct.

Anonymous reporting is not usually effective to resolve sexual, racial and other types of illegal harassment.

Every effort will be made to investigate anonymous reports within the limits of the information or disclosures that such reports entail.

18. TRAINING

The IMC Group will offer its Protagonists annual training in order to ensure awareness of the principles, values and concepts set out in this Code, as well as its wide dissemination.

The training will be conducted under the supervision of the Ethics Committee.

19. MISCELLANEOUS

IMC is committed to overseeing the implementation and application of the principles of this Code of Conduct and Ethics, as well as reviewing and updating its content and developing additional guidance, according to the results achieved and the experience gained.

This Code is part of a broader set of compliance policies and procedures of the IMC Group described in more detail in the employee handbooks and memos distributed. This Code is not intended to replace or alter, in a relevant manner, specific policies and procedures already in force and applicable to specific employees as provided in the internal procedures, memos and communications distributed or circulated by the IMC Group.

No policy can provide definitive answers to all questions. It is difficult to predict every decision or action that you might come across or consider. Whenever there is any doubt about the ethical or lawful choice to be made, or questions regarding any of the discussed standards or policies mentioned in this Code, you have an obligation to fully disclose the circumstances, seek guidance on the right thing to do, and continue to ask questions until you obtain guidance. The sooner a possible problem is detected and corrected, the better the IMC Group can protect its business and reputation against damage.

Those who violate the rules of this Code will be subject to disciplinary action. Failure to comply with this Code and federal, state and local laws and any applicable foreign laws, as well as with IMC Group corporate policies and procedures, may result in administrative sanctions, including termination of the employment contract for serious violation, without prejudice to applicable civil remedies and criminal liability.

ANNEX I

STATEMENT OF ADHERENCE TO THE CODE OF
CONDUCT AND ETHICS

I, _____, inscribed in the register of individual taxpayers (CPF/MF) under number _____ and holder of identification document (RG) number _____, who occupy the position of _____ at the IMC Group, DECLARE that I have received, read and am aware of and in accordance with all the provisions of the Code of Conduct and Ethics of International Meal Company Alimentação S.A. I hereby undertake to fully comply with it during all my professional activities, as well as to monitor all its updates.

I also undertake to communicate any violation of the Code of Conduct and Ethics that comes to my knowledge to the Ethics Committee, using the channels provided by International Meal Company Alimentação S.A.

_____, _____, _____, _____.
[city] [month] [day] [year]

[signature of the employee]

[full name of the employee]

ANNEX II

ADHERENCE AND COMMITMENT TO THE CODE OF CONDUCT AND ETHICS OF INTERNATIONAL MEAL COMPANY ALIMENTAÇÃO S.A.

I, _____, inscribed in the register of individual taxpayers (CPF/MF) under number _____ and holder of identification document (RG) number _____, as the legal representative of _____ [corporate name of the supplier], inscribed in the register of corporate taxpayers (CNPJ/MF) under number _____, declare, under penalty of law, that I have read the Code of Conduct and Ethics of INTERNATIONAL MEAL COMPANY ALIMENTAÇÃO S.A. ("IMC") and, after reading and understanding its contents, I agree to make every effort to comply with and enforce the rules contained herein.

I also declare that the company I represent does not use and is against the use of child, forced and/or compulsory labor in any of its activities, and this practice is also required from all its representatives, Protagonists, suppliers and/or contractors. I also assume, on behalf of the company I represent, the obligation to immediately report to the competent bodies any cases that may come to my knowledge.

Finally, I declare that I will be responsible for sharing the Code of Conduct and Ethics with my representatives, employees, suppliers and/or contractors who are directly or indirectly involved in the provision of services and/or supplies to IMC, as well as acting to resolve situations of non-compliance with this Code, which will be immediately reported to IMC.

_____, _____, _____.
[city] [month] [day] [year]

[signature of the employee]

[corporate name of the supplier]

By: [full name of the legal representative]