

# Policy

## Conflict of Interest

This document is confidential and for BP Bunge bioenergy internal use only. The content of this document is BP Bunge Bioenergy proprietary information. BP Bunge Bioenergy's Code of Conduct requires you to protect that information.

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This document applies only if it is consistent with the applicable legal and regulatory requirements. If you are within BP Bunge Bioenergy and you identify an apparent conflict of interest with these requirements, please consult BP Bunge Bioenergy Legal Area.

This document has been approved for BP Bunge Bioenergy's purposes only and not to describe or establish an industry standard or practice. Any recommendations or guidance are to help users to consider and evaluate potential options. Another approach may be appropriate.

### Introduction

A conflict of interest ("COI") can arise if your personal, professional, social, financial or political interests or activities interfere with your responsibilities at BP Bunge Bioenergy. Being transparent and proactive in disclosing and recording COIs allows them to be appropriately managed, protecting you and BP Bunge Bioenergy.

A COI can be actual, potential or perceived. You can avoid or manage COIs and thereby meet your responsibilities as a BP Bunge Bioenergy employee by following these principles:

- Never compete against BP Bunge Bioenergy, or use your position or influence in BP Bunge to benefit yourself or others in a way that is improper or can be perceived as improper;
- Never use or share BP Bunge Bioenergy information, assets or resources for your personal gain or the improper gain of others;
- Never work for, or provide services to, someone outside BP Bunge Bioenergy where this might interfere with your responsibilities or your ability to make objective decisions for BP Bunge Bioenergy, unless disclosed and recorded in accordance with this Policy;
- Never conduct BP Bunge Bioenergy business with a close relative or a person with whom you have a close relationship, or advance BP Bunge Bioenergy's interests through such individuals, unless disclosed and recorded in accordance with this Policy;

*Close relatives include people to whom you are related by birth, adoption, or marriage (e.g., spouse/partner, parent, child, grandparent, grandchild, sibling, uncle, aunt, niece, nephew, cousin).*

*A close relationship is one that impacts, or can be reasonably perceived to impact, your ability to make objective decisions for BP Bunge Bioenergy in dealings with that person (e.g., a romantic relationship, a close friendship).*

- Avoid or disclose investments, including known investments of a close relative or a person with whom you have a close relationship, that might create a COI.

*COIs are sometimes difficult to identify or recognize and can arise at any time. If you are ever unsure about a situation, speak to your manager, your Ethics and Compliance Representative, Legal, E&C, or HR Areas.*

## BP Bunge Bioenergy Requirements

This Policy applies to all BP Bunge Bioenergy employees. As a BP Bunge Bioenergy, you shall:

- Immediately disclose to your immediate manager all situations that might create a COI or the appearance of a COI;
- Follow BP Bunge Bioenergy's Human Resources requirements, whenever you are in a COI situation because you are involved in a relationship with another BP Bunge Bioenergy employee or non-BP Bunge Bioenergy staff member (e.g. contractor), or are in a position to hire, supervise, affect the employment terms of, or influence the management of a BP Bunge Bioenergy employee or non-BP Bunge Bioenergy staff member who is a close relative.
- Report any situations you suspect violate or could violate this Policy to your direct manager, Ethics and Compliance Representative, Legal or HR Areas.
- To report potential COIs, the Policy provides two procedures:
  - I. For employees with computer access, the report shall be recorded electronically in the Ethics Channel published by the company at <https://contatoseguro.com.br/bpbunge>, under the topic [Registro de Conflito de Interesse](#), with description of the potential COI and correspondent risk mitigation plan.
    - a) After the COI has been electronically recorded by the employee, the E&C area shall be responsible for sending the completed form, by email, to the immediate manager for information and approval. The line manager shall be responsible for updating periodically the status and according to the case, informing the situation to E&C.
    - b) After analysis of the COI, the manager shall answer the E&C email approving or refusing the report recorded by the employee.
    - c) The E&C area shall be responsible for the COI electronic record and for the approval sent by email from the immediate manager.

- II. For employees without computer access, the employee shall fill in the COI Disclosure Form (attached to this Policy), and after the correspondent approvals, by the respective line manager shall send it to the local HR Area.

This Policy shall be effective immediately and employees shall report any situation that may create a COI or the appearance of a COI under the penalty of disciplinary actions.



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