



Brazil Compliance Policy

RECIPIENTS: All JBS S.A. Team Members and its subsidiaries in Brazil.

1. PURPOSE

This Compliance Policy ("Policy") establishes the guidelines and general structure of JBS S.A. and its subsidiaries ("JBS" or "Company"), reaffirming its commitment to the *Faça Sempre o Certo* Compliance Program ("Program"), internal policies, laws, and applicable regulations in force in the countries where the Company makes or intends to make business.

2. RESPONSIBILITIES

- 2.1. This policy applies to all JBS Team Members in Brazil or abroad, who must also ensure that their business associates know and comply with the rules established herein, encouraging ethics and integrity in the entire value chain;
- 2.2. Business Associates are all suppliers, customers, or third parties related to JBS in the exercise of its activity;
- 2.3. Specific regulatory requirements must be mapped and followed to complement this policy.

3. REFERENCES

- 3.1. [Code of Conduct and Ethics](#);
- 3.2. [Business Associate Code of Conduct](#).

4. GENERAL PROVISIONS

- 4.1. All JBS Team Members are responsible for promoting an ethical environment with integrity, in compliance with the law, and adherent to the Company's internal rules;
- 4.2. The purpose of the Program is to adopt effective mechanisms to prevent, detect, and correct the occurrence of ethical, behavioral, and regulatory deviations, as well as disseminate the culture of transparency and integrity in the Company's relations with Team Members, business associates, the community, and the market in general.

5. COMPLIANCE STRUCTURE

- 5.1. The Company's Compliance Department, with the Board of Director's support, is responsible for implementing, applying, and continually improving the Program and providing support to the business areas;
- 5.2. The Compliance Department's structure must be designed to meet the specifics and risks of each business, provided with independence and autonomy to carry out its activities, as well as with material and financial resources, and professionals exclusively dedicated to such responsibilities, directly reporting to the Board of Directors;
- 5.3. The Ethics Committees are permanent, consultative, and deliberative bodies that support, along with the Compliance Department, the legitimacy, fulfillment, and improvement of the Compliance Program.



Brazil Compliance Policy

RECIPIENTS: All JBS S.A. Team Members and its subsidiaries in Brazil.

6. CODE OF CONDUCT AND ETHICS

- 6.1. JBS has two Codes of Conduct and Ethics - one for personnel and the other for Business Associates. Both apply globally and have been approved by JBS' Board of Directors;
- 6.2. The Code of Conduct applicable to Team Members must establish key rules and principles to guide and drive Team Members' professional conduct, regardless of hierarchical level or region of operation;
- 6.3. Likewise, JBS must also encourage its value chain to adhere to the Business Associate Code of Conduct, incorporating it as the integrity standard required for good commercial relationship;
- 6.4. The failure to comply with the guidelines of the aforementioned Codes may result in the application of disciplinary measures, contract termination, and other consequences, as permitted by law.

7. PILLARS OF JBS' COMPLIANCE PROGRAM

- 7.1. The Program is based on widely known and accepted standards, as well as guidelines and best practices related to global anti-corruption laws. The Compliance Program consists mainly of eight pillars:
 - Leadership and governance;
 - Risk assessment;
 - Policies and procedures;
 - Ethics Line and investigations;
 - Training and communication;
 - Third-party due diligence;
 - Preventive and detective controls to identify and mitigate possible violations of the Compliance Program;
 - Periodic Program evaluation.
- 7.2. The pillars are the main structure to develop the overall Compliance activities everywhere the Company operates, and also must be applied consistent with the applicable laws, regulations, and business specificities in the countries where JBS conducts business. The pillars is designed to help prevent, detect, and mitigate the occurrence of legal, regulatory, ethical, or behavioral violations, as well as promote a Culture of Compliance for the Company's Team Members, business associates, community business and the market in general;
- 7.3. Pillar 1: leadership and governance
 - 7.3.1. Based on the model "tone from the top" meaning the example coming from leadership, this pillar reinforces senior management alignment and commitment as the key factor to disseminate the culture of integrity, ensuring that:
 - Compliance Policies are aligned with the business strategy and objectives;
 - Sufficient resources are allocated to develop, implement, maintain, and improve the Program; and
 - Senior Management endorses the Program and perpetuates it at the other levels of the organization.

Brazil Compliance Policy**RECIPIENTS:** All JBS S.A. Team Members and its subsidiaries in Brazil.

7.4. Pillar 2: risk assessment

- 7.4.1. The core element for the preparation of risk assessment must be based on the understanding of the activity and risk exposure of each business, considering the particularities, geography, market regulation, culture, and topics to be prioritized in the Program, as well as the prevention and monitoring measures to reduce the Company's exposure;
- 7.4.2. The risks mapped must specifically focus on Compliance, classified according to their probability and impact. Action plans will be addressed to mitigate the materialization of such risks;
- 7.4.3. The risks will be evaluated and addressed by senior management together with the leaders of each business, who are responsible for establishing measures to manage the risks involved and, when necessary, adopt corrective measures or establish action plans. The three line defense play an essential role in the management and prevention of risks in the constant performance of the Business, Compliance Department, and Internal Audit Department;
- 7.4.4. The methodology used to identify risks will occur, as a rule, through interviews with key professionals, and may also be based on the verification of historical data, knowledge of the Compliance area, document review, systemic analysis, market changes and trends, as well as any other means to achieve its purpose;
- 7.4.5. The risk management review cycle must be carried out every two years after the last review or over a shorter period if it is justified.

7.5. Pillar 3: policies and procedures

- 7.5.1. This pillar establishes normative instructions to supplement the Codes of Conduct and Ethics, and addresses different topics related to the Program in response to the risk assessment process;
- 7.5.2. Compliance is responsible for preparing and periodically reviewing the content of these policies, which follow high governance criteria and are submitted to appropriate levels of approval for subsequent disclosure to the target audience.

7.6. Pillar 4: whistleblowing channel

- 7.6.1. The Company has the "JBS Ethics Line", a whistleblowing channel that may be used by Team Members, business associates, or any other stakeholder to report a potential violation of the Codes of Conduct and Ethics, policies, internal procedures, or any legislation that the Company is subject to;
- 7.6.2. JBS Ethics Line must be operated by an independent company, 24 hours a day, 7 days a week, available in the main languages where the Company operates. It allows anonymity and ensures secrecy, confidentiality, and non-retaliation to whistleblowers reporting in good faith. The reports generate a protocol number that allows whistleblowers to follow up on their reports;

Brazil Compliance Policy**RECIPIENTS:** All JBS S.A. Team Members and its subsidiaries in Brazil.

7.6.3. The Compliance department is independent to investigate the reports and is responsible for analyzing, investigating, and designating support areas, establishing the appropriate treatment and remediation measures on a case-by-case basis.

7.7. Pillar 5: training and communication

7.7.1. Training and communication are important tools to disseminate and standardize the understanding of the Program by promoting knowledge and encouraging the daily practice of the provisions established in the Codes of Conduct and Ethics, policies, procedures, and legislation in force;

7.7.2. The annual training cycle is defined based on the risks identified, considering particularities such as:

- Target audience and eligibility;
- Execution schedule;
- Content and topics addressed;
- Appropriate language according to the audience;
- Learning formats and solutions;
- Retention and reaction tests.

7.7.3. The new Team Members joining the Company must undergo corporate integration, which addresses topics such as the Code of Conduct and Ethics and the pillars of the Compliance Program;

7.7.4. Communication is periodic and continuous, aiming to maintain a culture of integrity, supported by the Company's senior management, and content dissemination may occur through diverse communication channels, especially the Internet, intranet, murals, corporate TV, and posters, among others.

7.8. Pillar 6: Due Diligence

7.8.1. Considering that the integrity of a company is built based on its relationship with other organizations and individuals, the Due Diligence pillar is based on the reputational analysis of the business associates considered to be risky and want to have or already have commercial relationship with the Company. Such analysis must identify and mitigate risks in the relationship with third parties that may imply reputational damage;

7.8.2. Third parties considered to be risky for the Company automatically undergo due diligence as they are registered in the accounting systems. The managers responsible for the hiring must support the third parties' due diligence, which shall be carried out before the formalization of the business;

7.8.3. Furthermore, the Compliance department may analyze third parties even if they are not considered risky if requested by the business in case there is suspicion or reason for such. Third parties will be periodically reevaluated, based on a specific policy.

7.9. Pillar 7: controls

7.9.1. Under the Program, upon identified situations of risk, preventive and detective controls must be executed to mitigate potential violations to the Program;

Brazil Compliance Policy**RECIPIENTS:** All JBS S.A. Team Members and its subsidiaries in Brazil.

7.9.2. The controls are designed together with the responsible areas, when applicable, and implementation must occur as systemic locks, electronic monitoring, flows, and levels of approval, among others, considering amounts to be paid, types of third parties (individuals or legal entities), payment frequency, and other characteristics;

7.9.3. The optimization of controls must occur through automation in the main JBS systems, allowing for constant monitoring and analysis by the Compliance area.

7.10. Pillar 8: assessment, oversight and discipline

7.10.1. The Program effectiveness must be evaluated and inspected through monitoring, internal and external audit evaluation, maintenance of legal and institutional commitments, and review of the Program initiatives to improve, mitigate, and remedy any irregularities identified;

7.10.2. In case of irregularities, disciplinary measures must be applied according to the severity of the violation, and may include warning, suspension, termination of employment contract, or termination of a contract with third parties;

7.10.3. To avoid reoccurrence or even prevent other Team Members from incurring in the same misconduct identified, remediation measures must also be adopted, among which implementation or review of policies, communication, training, and improvement of internal controls.

8. CONTINUOUS IMPROVEMENT

8.1. In addition to the aforementioned pillars, the Company must promote an environment that allows constant Program review aiming its effectiveness and assertiveness.

9. ROLES AND RESPONSIBILITIES

9.1. Fulfillment with this policy implies responsibilities for everyone acting on behalf of JBS, as follows:

9.1.1. Board of Directors members:

- Approve and review policies and Codes of Conduct;
- Analyze the quarterly report related to the improvement of the Compliance Program;
- Approve in the last instance the release of third parties considered risky blocked on a restrictive list, except for those already acquitted or whose report has been filed;
- Reinforce senior management's commitment to the Program and the culture of Compliance;
- Ensure independence and appropriate structure for the Compliance department.

9.1.2. Institutional Ethics and Business Committee members:

- Ensure compliance with the Codes of Conduct and Ethics and other policies and procedures arising from the Compliance Program;
- Define the necessary measures to disseminate and increase a culture of integrity in the Company;

Brazil Compliance Policy**RECIPIENTS:** All JBS S.A. Team Members and its subsidiaries in Brazil.

- Promote the prevention and fight against corruption and other illegal acts to which the Company may be exposed;
- Encourage and ensure the Company's senior management commitment to actions supporting the Compliance Program;
- Assist the enforcement of the standards of conduct, Code of Conduct and Ethics, Business Associate Code of Conduct, Compliance policies and procedures applicable to all Team Members, regardless of the position or function exercised, and to third parties, such as suppliers and service providers, among others.

9.1.3. Senior Compliance Leaders:

- Act independently;
- Diligently monitor, review and, when necessary, revise the Compliance Program;
- Report the status of the Program to the Board of Directors every quarter or whenever necessary;
- Preside the Institutional Ethics Committee;
- Align the Program with the best applicable government and regulatory practices and guidelines;
- Adopt timely measures to respond to possible misconduct;
- Ensure compliance with the Program pillars;
- Properly organize and structure the department to comply with the Program guidelines.

9.1.4. Presidencies, executive boards, and other leaderships:

- Unconditionally support the Compliance Program;
- Disseminate the culture of Compliance in their areas;
- Ensure and give efficacy to all Compliance regulations, including the Codes of Conduct and Ethics;
- Encourage behaviors that are aligned with the Program, prohibiting irregularities.

9.1.5. Team Members in general:

- Comply with laws, regulations, policies, and procedures of the Company, including the Codes of Conduct;
- Respect and disseminate the guidelines defined in this policy;
- Carry out mandatory training;
- Report to the Ethics Line, in good faith, any suspicion or violation of the Program or legislation;
- Collaborate with the information requested by the Compliance Department under the scope of the Program.

9.1.6. Legal Department members:

- Review together with the Compliance Department the Compliance Clause and include it in the contracts executed with third parties or in other situations deemed necessary;
- Send to the Compliance Department, when aware of it, information on administrative or judicial proceedings, official letters, and any other risk situations related to non-compliance with the Anti-Corruption Law, Codes of Conduct and Ethics, and other policies related to the Program.

9.1.7. Internal Audit members:

- Send to the Compliance Department, when aware of it, information on risk situations related to non-compliance with the Anti-Corruption Law, Codes of Conduct and Ethics, and other policies related to the Program.



NORMATIVE INSTRUMENT

IN-PRESI-CPL-0187
March 06, 2023
Review: 01

Brazil Compliance Policy

RECIPIENTS: All JBS S.A. Team Members and its subsidiaries in Brazil.

10. CLOSING REMARKS

- 10.1. Cases of an actual or potential violation of the Compliance Program must be reported to the supervisor, Compliance Department, Legal Department, or Human Resources Department, or through JBS Ethics Line available on www.linhaeticajbs.com.br;
- 10.2. A violation of any guideline of this procedure may result in serious consequences to JBS and to the Team Member, through the application of sanctions provided for in the Code of Conduct and Ethics, internal policies, and applicable legislation;
- 10.3. Pertinent situations, depending on the misconduct identified, may give rise to a legal obligation to report to the competent authorities.

* * *

Policy approved by the Company's Board of Directors at a meeting held on December 16, 2022.