



# Compliance Initiatives

December 2023



# Compliance Milestones 2017

JUN

Marcelo Proença nominated as **Global Compliance Director**, reporting **directly to JBS Board of Directors**

JUL

Launched JBS Compliance Program called "**Always do it Right**"



AUG

Restructured the department **hiring new team members**



OCT

Contracted Deloitte to develop a software to **automatize the Third Party Due Diligence process**

DEC

Implemented an outsourced and independent **Ethics Line (24/7)**



**Installation of 7 Ethics Committees**, one for each Business Unit in Brazil and one to oversee the whole Compliance Program called **Institutional Compliance Committee**

# Compliance Milestones 2018

MAR

A new **Global Code of Conduct and Ethics** and a **Code of Conduct for Business Associates** approved by the Board of Directors



APR

**JBS became a signatory of the Business Pact for Integrity Against Corruption.** This pact is one of Ethos Institute initiatives.



Hired a **Head of Ethics and Compliance for JBS USA**

AUG

In-person Code of Conduct **Training for C-Level:** Board Members, Presidents and Directors

OUT

Launched **Conflict of Interest survey** for Managers, Directors and Presidents  
Conflict of Interest form was pointed as a mandatory document for new hires in onboarding process

DEC

Training Cycle 2018 completed with **more than 115 thousand employees trained** on the Code of Conduct guidelines

# Compliance Milestones 2019

- FEB** Launched **Compliance News**, a newsletter dedicated to Compliance initiatives, for all team members in four languages: Portuguese, Spanish, English and Italian
- MAR** **Risk Assessment updated** for all Business Units in Brazil  
Implemented **20 compliance controls**
- MAY** **Anti-Corruption training in Brazil** for 100% of the administrative office employees, including presidents and directors
- JUL** Launched **JBS Compliance webpage**
- AUG** **Code of Conduct Training in Brazil** for 100% of the employees (including presidents/directors)
- SEP** **1º Compliance Day** occurred at JBS headquarter in Brazil
- OCT** **Third Party Training** Project started with business units
- OCT** **Compliance communication new campaign** for Ethics Line
- NOV** **Conflict of Interests Global Policy** published
- NOV** **Due Diligence Policy** published  
Code of Conduct and Ethics training completed with **more than 116,000 employees trained**

# Numbers 2019

- **116.650 team members** (including members of the Board of Directors and advisory committees) **trained on the Code of Conduct and Ethics**
- **16.075 team members** (administrative and leadership) **trained on Anti-Corruption**
- **2.512 complaints received** by JBS Ethics Line
- **1.860 reputational analysis** (due diligence) were carried out
- **2.100 internal processes were evaluated or monitored**
- **More than 45 hours of interviews as part of our Risk Assessment process updated**
- **Pointed by Leaders League Magazine as “The Best Compliance Department”**

# Compliance Milestones 2020

- JAN Contracted Deloitte to **improve and upgrade** the due diligence software
- MAR Launched **Global Anticorruption Policy**
- ABR **Compliance Program** checked by Internal Audit
- MAY **Training Cycle 2020 started with specific Compliance trainings**
  - Anti-corruption
  - Antitrust
  - Conflict of Interests
- JUN **Codes of Conduct and Ethics update** approved
- SEP **Training Cycle 2020 launched the Code of Conduct and Ethics Training**
- OCT 2º wave of **Conflict of Interests survey** with Managers, Directors, Presidents
- DEC **Business Associate Code of Conduct** training started to **Third Parties**

# Numbers 2020

- **115,702 team members** (including members of the Board of Directors and advisory committees) **trained on the Code of Conduct and Ethics**
- **42,297 team members** (administrative and leadership) **trained on Anti-Corruption, Antitrust, Conflict of Interests**
- **2,909 complaints received** by JBS Ethics Line
- **4,976 reputational analysis** (due diligence) were carried out
- **2,475 internal processes were evaluated or monitored**
- **1,280 conflict of interest forms received for evaluation**
- **97% adherence** in audit on best Compliance practices **carried out by an independent company**

# Compliance Milestones 2021

- JAN Contracted Deloitte to **improve and upgrade** the due diligence software
- MAR **Conflict of Interests survey** for Coordinators
- APR **Training Cycle 2021** started with **Anti-corruption, Antitrust** and **Labor Antitrust** for key team members
- MAY Launched **Moral and Sexual Harassment and Diversity & Inclusion** trainings  
**Ethics Line Workshop** to HR and Legal Departments
- JUN JBS Brazil adhered to **UN Global Compact – Collective Action in the fight against corruption in Agribusiness**
- JUL **Poultry, pork and cattle ranchers (third parties) teams and employees were** trained in our **Business Partners Code of Conduct**
- SEP **ABPA** - Brazilian Animal Protein Association **pro bono** participation to improve its Compliance Program
- OCT **Ethos Institute** Integrity evaluation renewal **increasing** 1 point in the Compliance Program performance reaching **8,6 of 10 points**.
- DEC Code of Conduct and Ethics training completed with **more than 118,000 employees trained**  
2º Compliance Day occurred at JBS headquarter in Brazil

# Numbers 2021

- **+118.000 team members** (including members of the Board of Directors and advisory committees) **trained on the Code of Conduct and Ethics**
- **+24.000 team members** (administrative and leadership) **trained on Anti-Corruption** and **Harassment and Discrimination**
- **+170 team members** (administrative and leadership) **trained on Antitrust** and **Antitrust in the labor sphere**
- **3,032\*** **complaints received** by JBS Ethics Line
- **6,391 reputational analysis** (due diligence) were carried out
- **3.252 internal processes were evaluated or monitored**
- **1,178 conflict of interest forms received for evaluation**
- **+1600 people followed** the **2<sup>nd</sup> JBS Compliance Day** online and **+12,000** views on the videos
- **+ 9,000** third parties trained on our **Business Partner Code of Conduct**

*\*Adjustment in the total number of complaints received by the JBS Ethics Line to suit to the independent third-party company platform.*

# Compliance Milestones 2022

JAN

Politically Exposed Persons – **PEP control** Implemented

FEB

Compliance director, **Marcelo Proença** participated in **Margarine Sales Convention** with Commercial, trade marketing and logistics team presenting the **Always Do It Right** Compliance Program guidelines and its benefits.

**Compliance News** celebrated the 3rd anniversary

MAR

Compliance director **Marcelo Proença** participated in **Seara Convention, Friboi Convention** and **Leadership Forums** reinforcing the **Always Do It Right** Compliance Program guidelines and its benefits. Around 800 leaders from all over Brazil participated

APR

Launched **Compliance Communication Campaign** for 2022

Launched the **Agroindustry Anti-Corruption Guidelines** content produced by the **Collective Action in the fight against corruption in Agribusiness**, composed of 17 companies, including **JBS**

MAY

**2021 internal and external audits finalized without material issue identified.** External audit indicated JBS Compliance Program adherence in **98.2% of legislations and best practices**

Launched the **Antitrust Global Policy**

JUN

**Risk Assessment updated** for all Business Units in Brazil

**Antitrust** training for key team members

Installation of the **Global Compliance Executive Committee**



# Compliance Milestones 2022

- JUL  **Training Cycle 2022** started with **Anti-corruption** training
- AUG  **Michael Koenig** appointed as **Global Ethics and Compliance Director** for JBS
- SEP  **2022 Internal Audit** finalized without any material issue identified  
JBS's Compliance Director **Marcelo Proença** conducted a training for the Company's collaborators in **MENA** (Middle East and North Africa), where Compliance topics and their importance to the business were discussed, as well as how to manage and execute JBS's Compliance Program. In addition, the program's pillars, policies and our Code of Conduct were reinforced
- OCT  **2022 external audit finalized** without material issue identified  
Launched **Diversity & Inclusion** training for all administrative team members and the **Code of Conduct and Ethics** training for all team members in Brazil
- NOV  3º wave of **Conflict of Interests survey** with Managers, Directors, Presidents  
JBS contributing to the initiative of the Comissão de Compliance e Integridade (CCI), a group of Câmara de Comércio Brasil-Canadá (CCBC) sponsored and participated in the book "**Compliance: Fundamentals and Sectoral Applications**". **Marcelo Proença**, JBS's Compliance Director contributed writing about Training and Communication
- DEC  More than **2,000 leaders** trained by the Compliance Director, Marcelo Proença, in the **Leadership Forums**, reinforcing compliance guidelines for an increasingly upstanding and positive environment  
Code of Conduct and Ethics training completed with **more than 130,000 employees trained**  
Published the Non-Retaliation Policy, Global and Local Compliance Policies and reviewed the **Global Anti-Corruption & Anti-Bribery Policy** and **Gifts, Entertainment and Hospitalities Policy**

# Numbers 2022

- **+ 130.000 team members** (including members of the Board of Directors and advisory committees) **trained on the Code of Conduct and Ethics**
- **+ 30.000 team members** (administrative and leadership) **trained on Anti-Corruption** and **Diversity and Inclusion**
- **+ 160 team members** (administrative and leadership) **trained on Antitrust**
- **+ 2.000 leaders** participated in **Conventions and Leadership Forums** and addressing and reinforcing topics related to integrity and to the pillars of our **Always Do It Right** program
- **3,444 complaints received** by JBS Ethics Line
- **6,307 reputational analysis** (due diligence) were carried out
- **5,893 internal processes were evaluated or monitored**
- **1,512 conflict of interest forms received for evaluation**

# Compliance Milestones 2023

FEB

Added the 22nd category of risky third parties subject of Due Diligence  
Implemented automatic **due diligence for non-Brazilian third parties**

Investiture of the **HR Executive Corporate Director** as a member of the **Institutional Ethics Committee**

Marcelo Proença, Compliance Director participated as a **member of the ABA Compliance Committee**, in the 1st Meeting of the National Board of Directors of 2023, with the presence of members of the ABA National Board of Directors, Superior Council, Compliance Committee, Fiscal Council and Presidents of Committees

MAR

Marcelo Proença, Compliance Director and Company executives participated in the **Confraternity, organized by Friboi** to cattle farmers to **disseminate JBS Compliance Program and best practices in compliance for the Agribusiness value chain, reinforcing our commitment to conduct the business ethically and with integrity**

**Due Diligence, Government Relationship and Conflict of Interest** policies revised

**Global policies** published in **Spanish version**

**Review** of all **risk third party categories** for Due Diligence purposes

MAY

**External audit** carried out by an independent auditors, increasing **from 98.2% to 99.2% of adherence**

Specific training on **Relationship with Public Agents** for JBS leaders, with the participation of the Compliance Director, **Marcelo Proença**, the Institutional Relations Director, **Carlos Cidade**, and the former **Minister of Planning** and CGU Valdir Simões

JUN

**Training Cycle 2023** started with **Conflict of Interests** training

# Compliance Milestones 2023

AGO

Launch of **Anti-Corruption** training for all administrative team members in Brazil

**2023 Internal Audit** finalized without any material issue identified

Launched the **Merge & Acquisition Global Policy**

**Risk Assessment 2023** updated



SEP

Renewed the integrity assessment with the **Ethos Institute**, **increasing the evaluation score**

Beginning of **the Conflict of Interest Research**, including Coordinators

Launch of the **Code of Conduct and Ethics** training for all team members in Brazil

OCT

Beginning of the **Conflict of Interest Survey** to Coordinators and other specific areas/department.

NOV

**Review of third-party risk categories** for due diligence purposes

DEC

Publication of all **public Compliance policies** on the **JBS website** in Portuguese, English and Spanish

The conclusion of the **2023 Training Cycle**

# Tone at the Top

## Unrestricted support from senior management and members of the Board

- ✓ **Participation in all Compliance events**
- ✓ **Members of the Ethics Committees**
- ✓ **Communications, highlight the “Tone at the Top” in Compliance News**
- ✓ **Participation of the CCO in the Board of Directors meetings**
- ✓ **Presentation of the Compliance Program's initiatives and developments to the Advisory Committees**

The screenshots show the following content:

- Article 1:** Headline: "COMPLIANCE NEWS Edition 11 December 2019". Subtitle: "RIGHT". Article: "Jeremiah O'Callaghan, Chairman of the Board of Directors, comments on the relevance of Compliance to disseminate values both within the Company and externally".
- Article 2:** Headline: "HIGHLIGHT". Article: "To Gilberto Tomazini, CEO at JBS Global, Compliance is a gear in Business and an allied to the Company's competitiveness".
- Article 3:** Headline: "HIGHLIGHT". Article: "JBS Brazil's President of Operations, Wesley Filho, highlights that compliance can be a tool in the Business and is indispensable to the Company's evolution".
- Article 4:** Headline: "HIGHLIGHT". Article: "Compliance JBS appreciates the availability and Ownership of all team members during 2019".
- Article 5:** Headline: "HIGHLIGHT". Article: "Happy Holidays! Keep an eye out for 2020, we will face many challenges ahead".

At the bottom of the stack, there is a footer with the JBS Ethics Line logo and contact information.

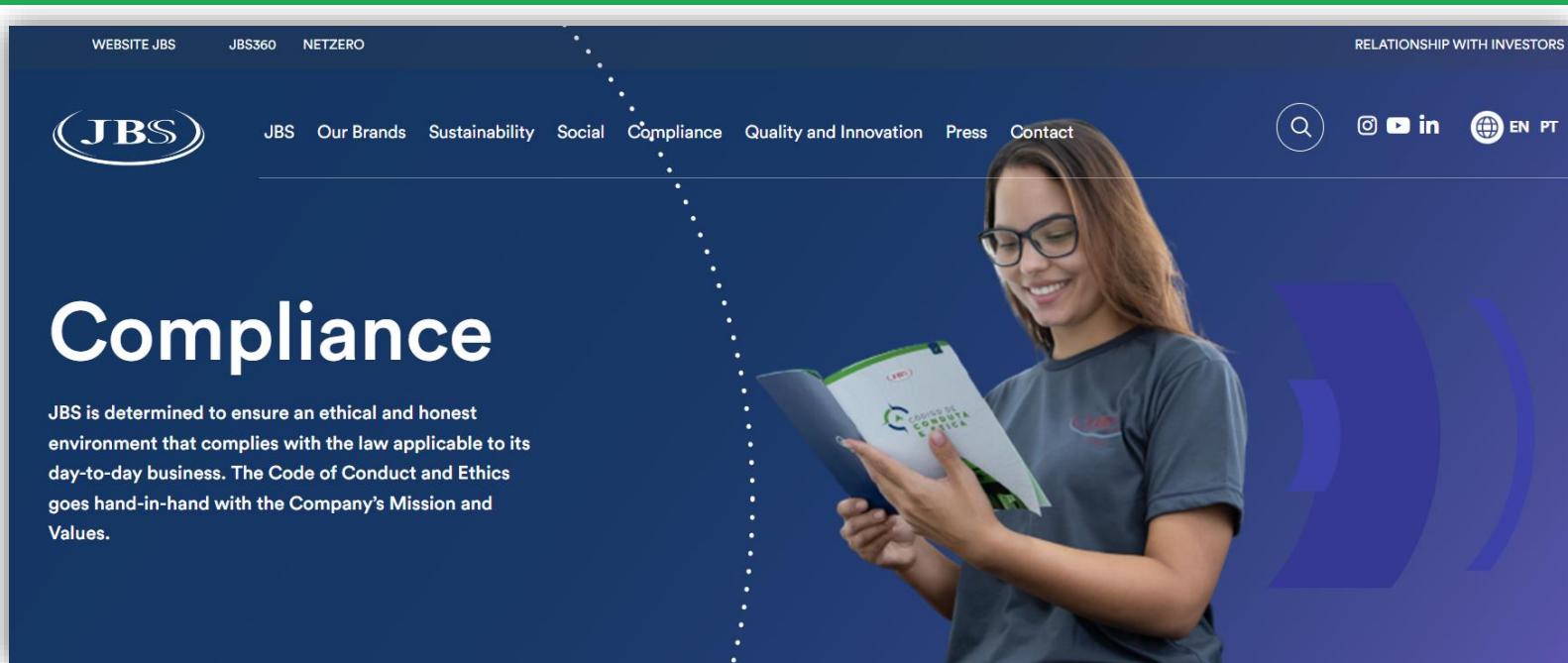
# Codes of Conduct & Ethics



- ✓ Launched in May 2018 and revised in September 2020  
(Term of Acceptance, Consent and Acknowledge signed annually in the training cycle and/or in onboarding)
- ✓ In all regions where JBS operates
- ✓ In two versions – For team members and for third-parties
- ✓ Electronic versions available at Compliance website [www.jbs.com.br/compliance](http://www.jbs.com.br/compliance)

# JBS Compliance Website

jbs.com.br/compliance



The screenshot shows the JBS Compliance website homepage. The header features the JBS logo, navigation links for WEBSITE JBS, JBS360, NETZERO, and RELATIONSHIP WITH INVESTORS, and social media icons for Instagram, YouTube, LinkedIn, and a globe. The main content area has a dark blue background with a woman in a grey t-shirt reading a document titled 'Código de Conduta e Ética'. The word 'Compliance' is prominently displayed in large white text on the left side. Below it, a text block explains the company's commitment to ethical and honest compliance with laws.

WEBSITE JBS JBS360 NETZERO RELATIONSHIP WITH INVESTORS

**JBS** JBS Our Brands Sustainability Social Compliance Quality and Innovation Press Contact

Compliance

RELATIONSHIP WITH INVESTORS

EN PT

# Compliance

JBS is determined to ensure an ethical and honest environment that complies with the law applicable to its day-to-day business. The Code of Conduct and Ethics goes hand-in-hand with the Company's Mission and Values.

Código de Conduta e Ética

# JBS Compliance Day

Event held in August, 2019



# 2<sup>nd</sup> JBS Compliance Day

Event held in December, 2021

+1600 people participated online

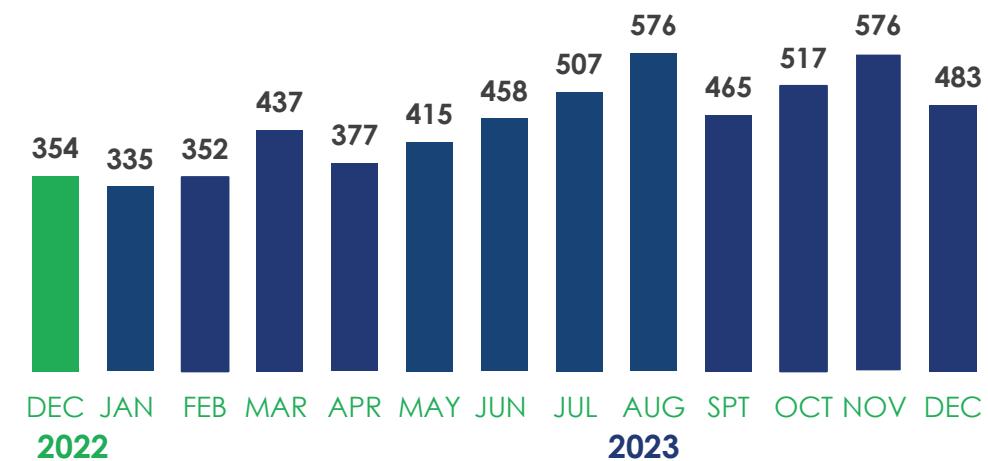
+12,000 views



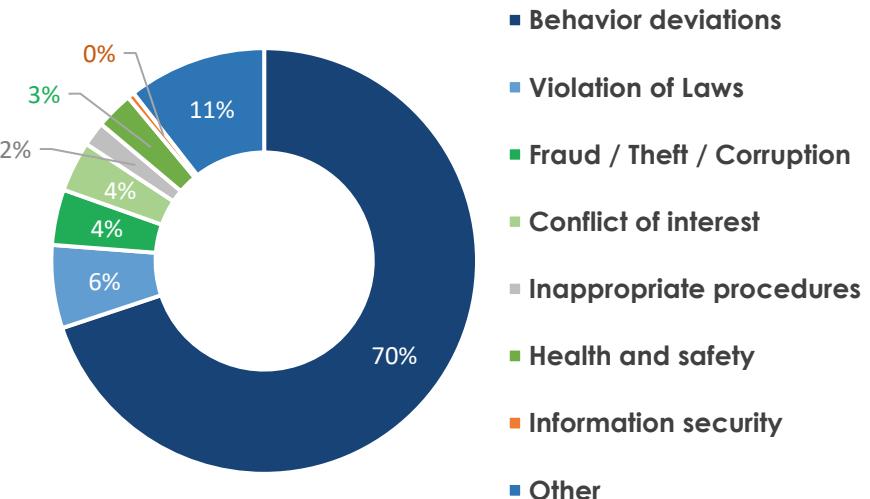
# JBS Ethics Line

Launched in December, 2017

Available for employees and third-parties 24h/7, in 4 languages

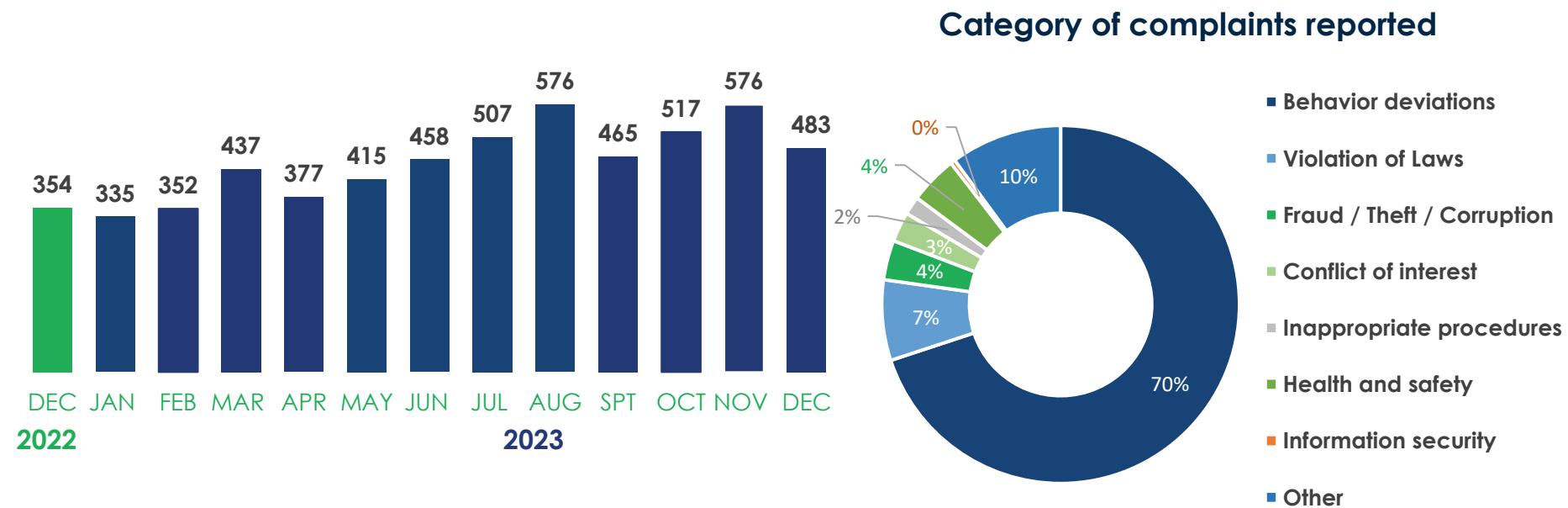


Category of complaints reported



# JBS Ethics Line

Launched in December, Dec-2022 to Dec-2023  
**Available for employees and third-parties 24h/7, in 4 languages**

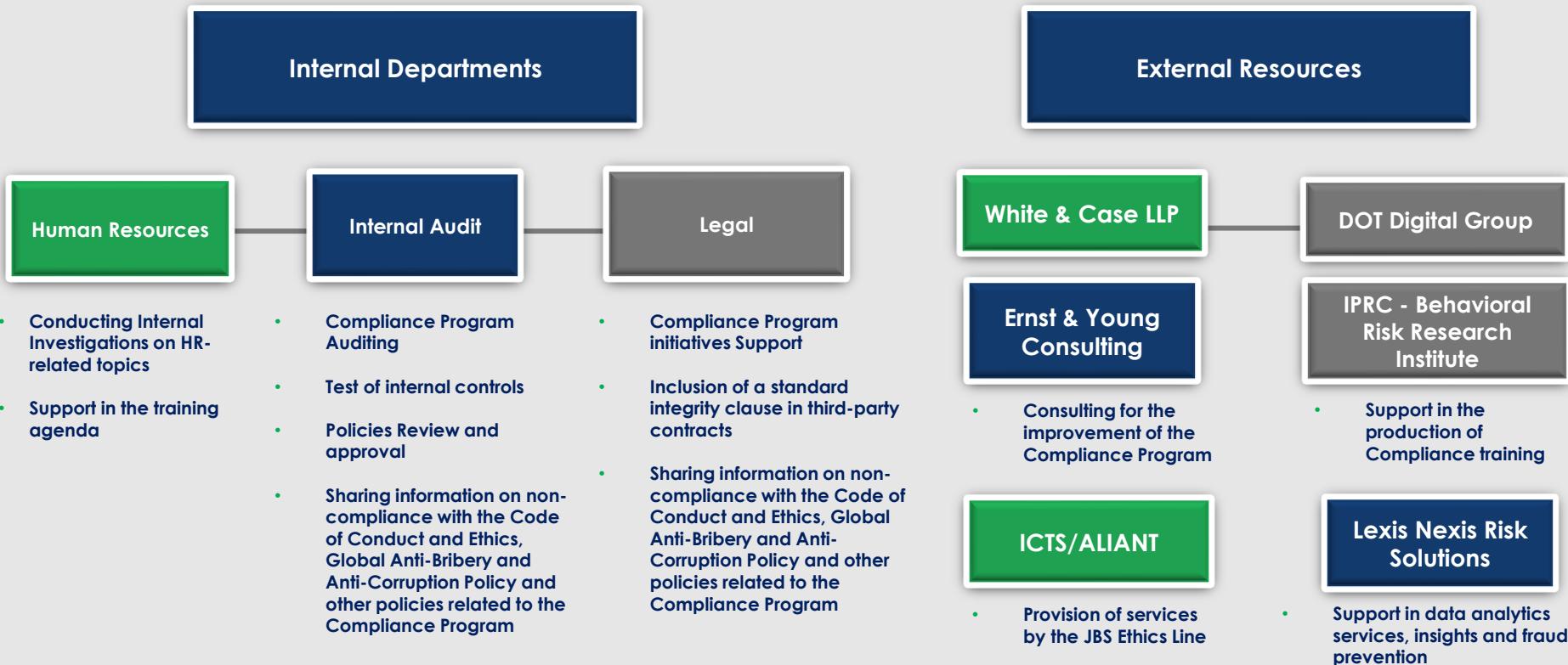


# Governance – Ethics Committees



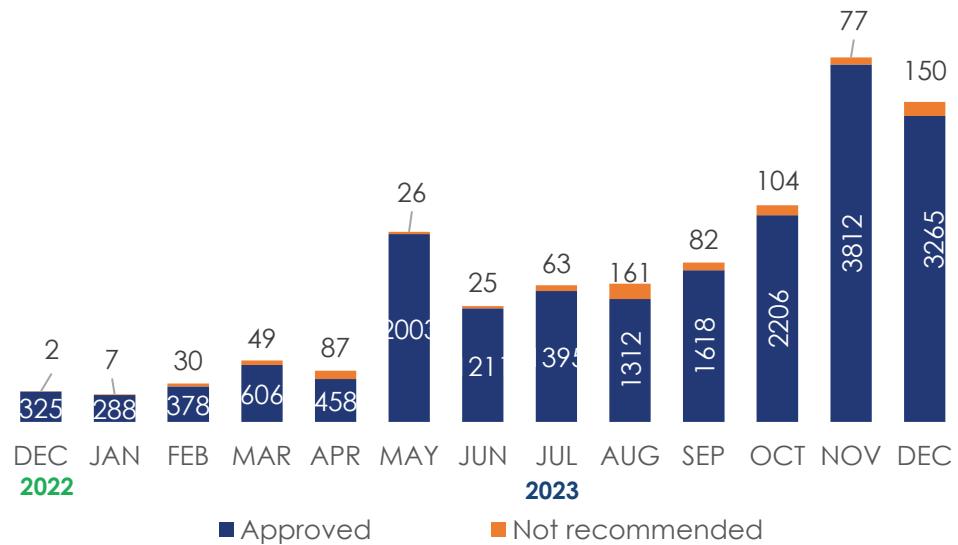
# Compliance External Departments and Resources

In addition to the dedicated Compliance and Governance structure, we have the support of other external departments and resources in the execution of the Compliance Program initiatives.

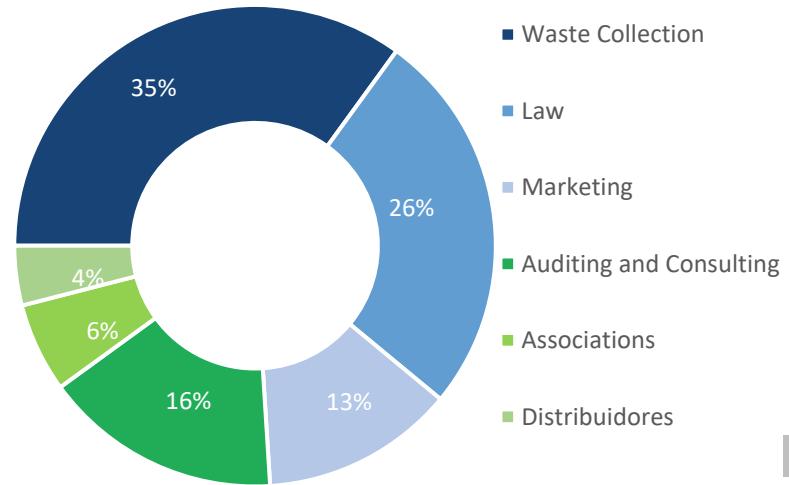


# Third-Party Due Diligences

**Methodology:** using a customized tool, automatically checks performed, mainly related to corruption, antitrust, sanctions, human rights and environment issues.



**Third- Party categories and percentage not recommended**



# Compliance News



# Controls and Monitoring

Implemented to prevent and detect corruption focus on JBS Compliance Program

| <b>+790</b><br>Companies and individuals blocked (Watch List)  | <b>+500</b><br>Monitored companies and individuals (Yellow List)   | <b>20</b><br>Preventive and Detective controls  |
|--|--|---|
| <br>Related direct or indirect in J&F executives plea-bargain | <br>Involvement in suspected and/or non-compliance activities |  Follow the money <ul style="list-style-type: none"><li>❖ Limitation of cash in units and monitoring additional money requests</li><li>❖ Payments to Risky Third Parties</li><li>❖ Payments for individuals</li><li>❖ Company's aircrafts use</li><li>❖ Travel expenses</li><li>❖ Discounts /Bonus for clients</li><li>❖ Gifts, Donations and Sponsorships</li><li>❖ PEP</li></ul> |

# Policies and Procedures

Documents implemented to guide employees in conducting their activities

| Policies & Procedures                | Status    | Scope   |
|--------------------------------------|-----------|---|
| Antibribery and Corruption           | Published |  |
| Sponsorships                         | Published |  |
| Donations                            | Published |  |
| Conflict of Interests                | Published |  |
| Gifts, Entertainment and Hospitality | Published |  |
| Due Diligence                        | Published |  |
| Ethics Line                          | Published |  |
| Consequences                         | Published |  |
| Relationship with Government Agents  | Published |  |
| Antitrust                            | Published |  |
| Global Compliance                    | Published |  |
| Local Compliance                     | Published |  |
| Non-Retaliation                      | Published |  |
| Merge & Acquisition                  | Published |  |

# Stakeholders

Our Compliance Program is monitored by stakeholders

## Customers



## Auditors and Rating Agencies



## Government / Investors



## Banking and Insurance



# Thank you!

See more at:  
[www.jbs.com.br/compliance](http://www.jbs.com.br/compliance)

[compliance@jbs.com.br](mailto:compliance@jbs.com.br)

