



Global Conflict of Interest Policy

RECIPIENTS: All JBS S.A. personnel, controlled companies and its unlisted subsidiaries.

1. PURPOSE

Establish criteria, responsibilities and guidelines related to actual or potential Conflicts of Interest at JBS S.A., and its listed and unlisted subsidiaries and affiliates ("JBS" or "Company").

2. SCOPE

This Policy applies to all JBS S.A. personnel, controlled companies and its unlisted subsidiaries.

3. DEFINITIONS

3.1. Conflict of Interest

3.1.1. A Conflict of Interest may arise whenever an employee's personal or professional interests are not in the Company's best interest.

3.2. People

3.2.1. Relatives are spouses, children, grandchildren, parents, grandparents, siblings, aunts/uncles, nieces/nephews, first degree cousins, in-laws, and step family, all whether through blood, marriage, or adoption;

3.2.2. Close People are spouses, partners, romantic relationships, close friends or associates;

3.2.3. Government Official is any person who provides service to, or represents a country, State or Locality, even if temporarily or without remuneration, whether by election, appointment, designation, hiring or any other relationship. The definition of a government or public official may vary from country to country, thus local legislation must be consulted;

3.2.4. Politically Exposed Person (PEP) is any person who performs or has performed a public function or held a public position at a local, national or international level, and includes their representatives, Relatives or Close People. The public functions that define a PEP may vary according to the legislation of each country, thus the local legislation must be consulted.

4. GENERAL PROVISIONS

4.1. All Company employees have a duty to avoid, and disclose if they arise, Conflicts of Interest, whether actual or potential, in carrying out their job-related activities. Company employees must always consider the Company's best interests in a legal and transparent manner;

4.2. There are wide varieties of situations that may create a Conflict of Interest. The examples below are merely illustrative and are not meant to be an exhaustive list:

4.2.1. Employees involved in a romantic or intimate relationship where one reports to the other (directly or indirectly), when dealing with related areas, or when both are involved in the same approval/supervision flow;



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- 4.2.2. Employees who hire or supervise Relatives or Close People, or who carry out business with Relatives or Close People who are suppliers, competitors, customers or work as business partners;
- 4.2.3. Obtain or provide personal benefits, financial or otherwise, by doing business with the Company's business partners (suppliers, customers, or competitors);
- 4.2.4. Borrow or utilize Company resources, assets, property or information, for personal or third parties' use, when it conflicts with JBS' interests (unless previously approved in accordance with local procedures);
- 4.2.5. Employees who have Relatives or Close People who are PEP or Government Officials that have interactions with JBS businesses;
- 4.2.6. Performing other activities during JBS working hours or against the Company's interest, such as:
 - Temporary or extra work;
 - Own a business or being a shareholder of another company;
 - Leadership in any other company;
 - Leadership or Board membership in profit or non-profit organizations without the prior approval of the Ethics and Compliance Department.

5. PROCEDURES

- 5.1. All Conflicts of Interest must be disclosed in accordance with applicable local procedures. Employees are encouraged to raise issues and questions about this Policy with their immediate supervisor, local Human Resources or Compliance representative(s), or through the Ethics Line.

6. VIOLATIONS

- 6.1. Violations of this Policy or JBS' Codes of Conduct may result in serious consequences, both to the Company and to the employee, and may result in disciplinary actions, up to and including employment, as permitted by law.

7. REFERENCES

- 7.1. [JBS Code of Conduct and Ethics](#);
- 7.2. [Business Partner Code of Conduct](#).

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Policy approved by the Global Compliance Executive Committee at a meeting held on May 26, 2023.