

Compliance

Initiatives

October 202





Marcelo Proença nominated as Global Compliance Director, reporting directly to JBS Board of Directors Launched JBS Compliance Program called "Always do it Right" Restructured the department hiring new team members Contracted Deloitte to develop a software to automatize the Third Party Due Diligence process JBS ETHICS LINE Implemented an outsourced and independent Ethics Line (24/7) DEC

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



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



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 Launched JBS Compliance webpage **Code of Conduct Training in Brazil** for 100% of the employees (including presidents/directors) AUG 1° Compliance Day occurred at JBS headquarter in Brazil SEP **Third Party Training** Project started with business units Compliance communication new campaign for Ethics Line OCT Conflict of Interests Global Policy published Due Diligence Policy published NOV 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"



JAN Contracted Deloitte to **improve and upgrade** the due diligence software MAR Launched Global Anticorruption Policy **ABR** Compliance Program checked by Internal Audit **Anti-corruption** MAY Training Cycle 2020 started with specific Compliance trainings **Antitrust** Conflict of Interests Codes of Conduct and Ethics update approved Training Cycle 2020 launched the Code of Conduct and Ethics Training 2° 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



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 **Aaribusiness** 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 OCI 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 2° 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 2nd JBS Compliance Day online and +12,000 views on the videos
- + 9,000 third parties trained on our Business Partner Code of Conduct



JAN Politically Exposed Persons – PEP control Implemented Compliance director, Marcelo Proenca participated in Margarine Sales Convention with Commercial, trade FEB marketing and logistics team presenting the Always Do It Right Compliance Program guidelines and its benefits. **Compliance News** celebrated the 3rd anniversary Compliance director Marcelo Proença participated in Seara Convention, Friboi Convention and Leadership MAR Forums reinforcing the Always Do It Right Compliance Program guidelines and its benefits. Around 800 leaders from all over Brazil participated Launched Compliance Communication Campaign for 2022 **APR** 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 Risk Assessment updated for all Business Units in Brazil JUN **Antitrust** training for key team members

Installation of the Global Compliance Executive Committee



JUL Training Cycle 2022 started with Anti-corruption training Michael Koenig appointed as Global Ethics and Compliance Director for JBS AUG 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 SEP 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 2022 external audit finalized without material issue identified Launched Diversity & Inclusion training for all administrative team members and the Code of Conduct and **Ethics** traning for all team members in Brazil OCI 3° 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 NOV and Communication 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 DEC 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



FEB

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

MAR

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

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

 MAY

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

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



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.



Review of third-party risk categories for due diligence purposes



Publication of all **public Compliance policies** on the **JBS website** in Portuguese, English and Spanish The conclusion of the **2023 Training Cycle**

Numbers 2023



- + 125.000 employees (including members of the Board of Directors and advisory committees) trained on the Code of Conduct and Ethics
- + 30.000 employees (administrative and leadership) trained on Anticorruption and Conflict of Interest
- + 1.000 leadership trained in Conventions and Leadership Forums addressing and reinforcing themes related to integrity
 and the pillars of our Always Do It Right program
- 5.500 reports received by the JBS Ethics Line, of which the "Behavior deviations" category represents 70%
- Out of the total reports received by the JBS Ethics Line, 1.062 were substantiated
- In due diligence, 19.391 risk analyses were conducted for third parties and +12.055 analyses were carried out for their respective partners
- 7.228 internal processes were assessed and monitored
- 2.002 Conflict of Interest forms were received for assessment



Renewed the integrity assessment with the **External Audit Bakertilly**, achieving an **assessment score of 98.6%**.

MAY

Renewal of the commitments of the Agribusiness Anti-Corruption Collective Action - UN Global Compact.

Completion of the Action Plans for the 2023 cycle Conflict of Interest Research by the Coordinators of the JBS Group and the Origination team of Friboi.

Opening of the **Compliance & Integrity Training Cycle** with the theme **"Combating Harassment"** for over **30,000** eligible employees.

AUG

Launch of the **Anti-Corruption** training – featuring an interactive game to solve ethical dilemmas, reaching over **30,000 eligible employees**.

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

Launch of the Code of Conduct and Ethics Training for more than 120,000 eligible operational employees.

SEP

Beginning of the Conflict of Interest Research, including managers, directors and presidents.

Won the award for **Best Agribusiness Compliance Program** at the 2024 Edition of the **Leaders League** Compliance Summit & Awards Brazil.



Tone at the Top

Unrestricted support from senior management and members of the Board

- **8** Participation in all Compliance events
- © 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



Codes of Conduct & Ethics













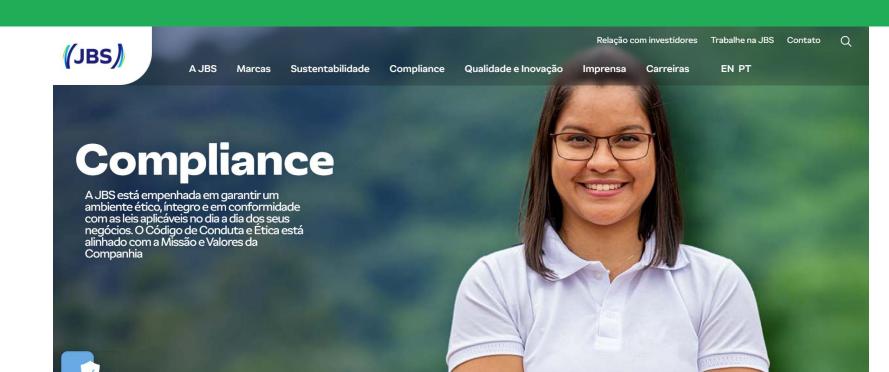


- Equipment 2018 and revised in September 2020 (Term of Acceptance, Consent and Acknowledge signed annually in the training cycle and/or in onboarding)

- Stelland Electronic versions available at Compliance website www.jbs.com.br/compliance

JBS Compliance Website

jbs.com.br/compliance



JBS Compliance Day

Event held in August, 2019











2nd JBS Compliance Day

Event held in December, 2021

+1600 people participated online

+12,000 views



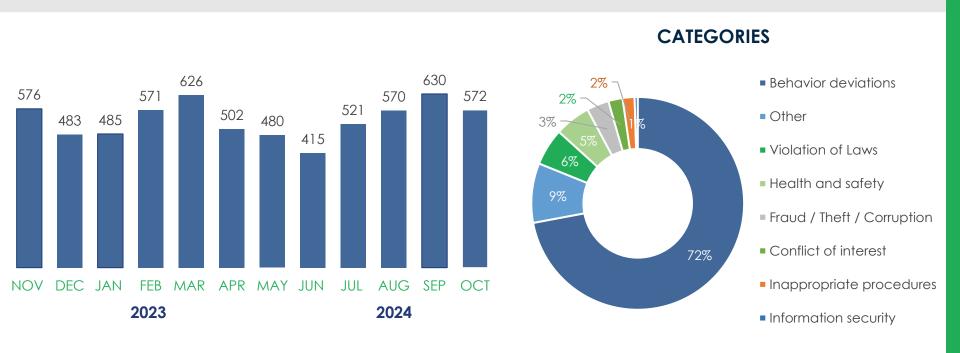




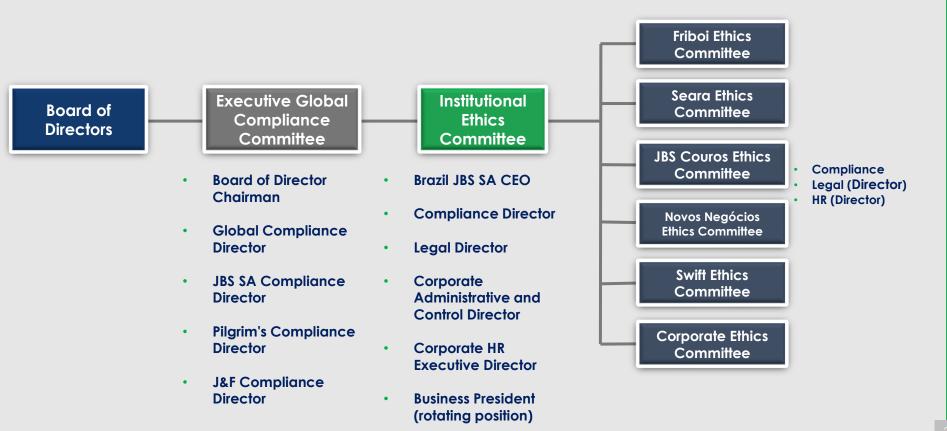
JBS Ethics Line

Channel implemented in December 2017;

Available for employees and third parties, 24 hours a day, 7 days a week, and in 4 languages



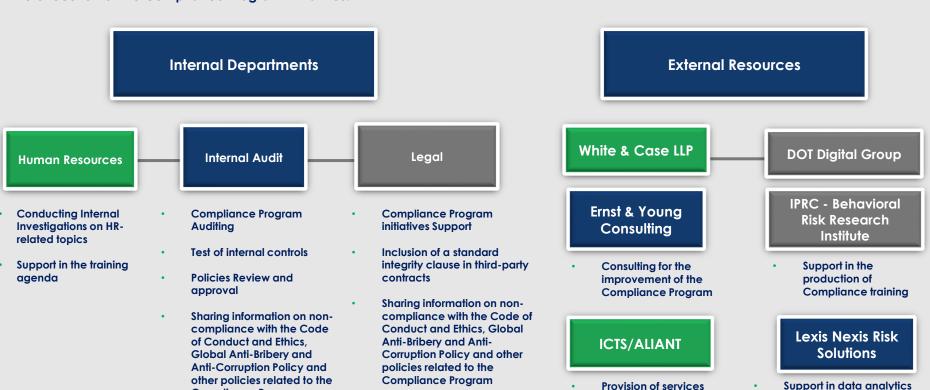
Governance – Ethics Committees



Compliance External Departments and Resources

Compliance Program

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.

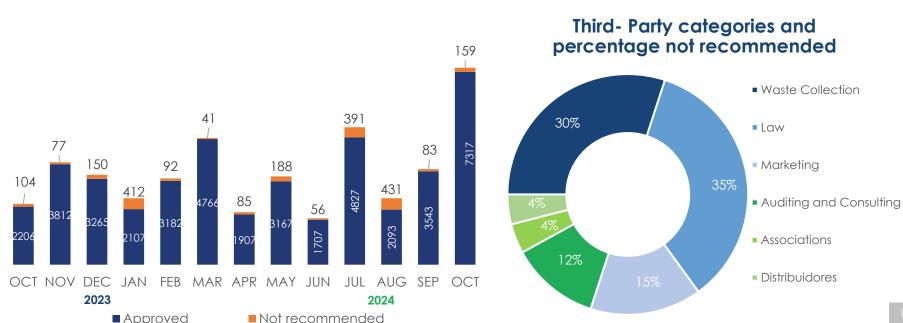


by the JBS Ethics Line

prevention

Third-Party Due Diligences

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













Controls and Monitoring

Implemented to prevent and detect corruption focus on JBS Compliance Program

+980

Companies and individuals blocked (Watch List)

+670

Monitored companies and individuals (Yellow List)

18

Preventive and Detective controls

Follow the money



Related direct or indirect in J&F executives pleabargain



Involvement in suspected and/or non-compliance activities



- Monitoring of cash in units
- Payments to Risky Third Parties
- Payments to individuals
- Payments to PEPs

- Related Parties
- Gifts, Entertainments and Hospitalities
- Donations and Sponsorships

Policies and Procedures

Documents implemented to guide employees in conducting their activities

Policies & Procedures	Status	Scope
Antibribery and Corruption		
Sponsorships		6
Donations		6
Conflict of Interests		
Gifts, Entertainment and Hospitality		6
Due Diligence		6
Ethics Line	Di Jaliah a d	6
Consequences	Published	6
Relationship with Government Agents		6
Antitrust		6
Global Compliance		
Local Compliance		6
Non-Retaliation		
Merge & Acquisition		

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



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