# **Evaluation of Fulfilment of the**"Public Livestock Commitment"

JBS S.A.

Report No.: Z0565778, Rev. 00

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**Business Assurance** 

JBS S.A.

To JBS S.A.

# I) Introduction

Since 2007, the Non-Governmental Organization Greenpeace has been studying the behavior of the livestock farming production chain in the Amazon. After a long investigative process in 2009, the organization issued the report "Slaughtering the Amazon". ", highlighting the relationship between the beef plants involved in illegal deforestation and slave labor, and leading-edge products traded on the international market. Since then, the JBS, Marfrig and Minerva beef plants undertook a "Public Livestock Commitment" to exclude from their lists of suppliers those farms that have cleared the Amazon forest after October 2009, in addition to those employing labor analogous to slavery, and owning areas subject to embargoed of the Brazilian Environmental Protection Agency (IBAMA) or located on indigenous lands and environmental conservation units. The public commitment setting out the criteria for purchasing cattle on properties located in the Amazon Biome is called "MINIMUM CRITERIA FOR TRANSACTIONS WITH CATTLE AND BEEF PRODUCTS ON AN INDUSTRIAL SCALE IN THE AMAZON BIOME". In June 2017, Greenpeace withdrew from the "Public Livestock Commitment," however, JBS continues to apply its criteria for purchasing cattle in the Amazon Biome region as well as its Responsible Purchasing Policy, and maintains its commitment to transparency in the annual publication of the independent auditor's report in compliance with the public commitment.

# II) Purpose

DNV GL was retained to independently evaluate, via an audit process, the information and procedures of JBS that make it possible to establish whether the Company has complied with the socioenvironmental criteria assumed in the "Public Livestock Commitment," covering the period from January 1, to December 31, 2017.

# III) Audit period

The audit took place in the period between July 11 and October 9, 2018.

# IV) Description of the Company and of the Beef Cattle Purchase Process

Founded in 1953, JBS is one of the world's leading food industry companies with approximately 220,000 employees in over 20 countries. The Company owns a portfolio of brands that are acknowledged for their excellence and innovation, including Friboi, Moy Park, Pilgrim's Pride, Primo, Seara, Swift, Gold'n Plump and others, serving over 350,000 customers of more than 150 nationalities worldwide. The Company's focus on innovation also reflects its management approach to related businesses in areas such as leather, biodiesel, collagen, personal hygiene and cleaning products, natural wrappings, solid waste management solutions, metal packaging and transportation. In Brazil, the company owns 35 beef processing units, of which 21 purchase cattle from farms located in the Amazon Biome. The scope of this audit considered these 21 units: Alta Floresta/MT, Água Boa/MT, Araputanga/MT, Araguaína/TO, Barra do Garças/MT, Confresa/MT, Colider/MT, Diamantino/MT, Juara/MT, Juína/MT, Marabá/PA, Pedra Preta/MT, Pontes e

Lacerda/MT, Pimenta Bueno/RO, Porto Velho/RO, Rio Branco II/AC, Redenção/PA, São Miguel do Guaporé/RO, Santana do Araguaia/PA, Tucumã/PA and Vilhena/RO.

The "Public Livestock Commitment" consists of four key points publicly embraced by Brazil's 3 largest beef processing groups. Under the Commitment, the signatories have agreed to adopt the criteria established within certain deadlines, ceasing to acquire cattle originating from:

- a) Farms (direct and indirect suppliers¹) who engaged in deforestation within the Amazon Biome after October 2009;
- b) Farms on the list of areas embargoed by the Brazilian Environmental Protection Agency (IBAMA) and/or Farms located on Indigenous Lands and on Environmental Conservation Units (protected areas);
- c) Farms that engage in slave or degrading labor, in accordance with the list of the Ministry of Labor and Employment (MTE) published on its official site or on the List provided by InPACTO (the Institute for the National Compact for the Eradication of Slave Labor), under the Freedom of Information Law;
- d) Farms on trespassed lands or which were acquired using rural violence, based on unmistakable awareness of the company, by means of communiqués issued by the Prosecution Office, the Agrarian Reform Institute (INCRA), the Justice and others.

To comply with the Public Commitment, in 2010 JBS set up a system for the socioenvironmental monitoring of the farms that supply cattle, consisting of two analysis processes that function in tandem with the Company's computer systems.

All farms supplying cattle are entered on the JBS Enterprise Resource Planning – ERP system which is for corporate e use and is used by all meat units when purchasing cattle. The JBS corporate Sustainability area is responsible for defining the status of those registers against the socioenvironmental criteria the JBS responsible procurement policy.

The first process of analysis of supply farms involves downloading, on a daily basis, the public lists of IBAMA and the MTE on their official sites and subsequently cross-checking the suppliers' individual/corporate taxpayer numbers (CPF/CNPJ) registered with the Company. Supply farms whose taxpayer numbers appear on the public lists of IBAMA and/or MTE are automatically blocked on the JBS computer system for the purchase of raw materials.

In the case of registered suppliers whose taxpayer numbers are on the list of areas embargoed by IBAMA, and which have more than one farm registered to them, only the farm appearing on the public list remains blocked for the purchase of raw materials. That is why the supplier must produce proof that the farm is different from the one on the IBAMA List.

The farms that supply products indirectly to the packing units are not systematically checked yet. Thus, this should be considered a "non-compliance" until the beef units adopt auditable procedures for indirect suppliers.

In the case of suppliers whose CPF/CNPJ appears on the MTE List, all farms covered are blocked in the JBS computerized procurement system, with no exceptions.

The second analysis process consists of geospatial monitoring which digitally superimposes georeferenced maps of the farms supplying the cattle on the criteria for deforestation and trespassing on protected areas (Indigenous Lands and Environmental Conservation Units) within the Amazon Biome. This geospatial monitoring is carried out by the geomonitoring company contracted by JBS, Agrotools, based on official deforestation maps published by the National Space Research Institute – INPE (PRODES and DETER), official maps of Indigenous lands produced by the National Indigenous Peoples' Foundation – FUNAI and official maps of Environmental Conservation Units of the Ministry of the Environment – MMA, which Agrotools systematically consults to ensure that the data on the monitoring system is always up to date. The georeferenced maps of the farms supplying JBS are cross-checked with the digital maps provided by INPE, FUNAI and the MMA to verify the existence of overlapping and define the compliance status of the supplier farms (blocked or approved).

Agrotools produces a daily monitoring report showing the compliance status of the farms that supply cattle to JBS, containing breakdowns of the analyses carried out on each of its supply farms located in Amazonia Legal, classifying them as "blocked" or "approved", while indicating the reason for non-compliance: trespassing on Environmental Conservation Units or on Indigenous Lands, deforestation based on data from DETER and/or PRODES (referring to the years 2009 to 2017). Supply farms displaying the "blocked" status are automatically precluded from purchases of raw materials on the JBS ERP system.

On December 31, 2017, JBS's suppliers list included over 80 thousand farms, of which 5,920 are not being used for cattle purchases due to restrictions linked to social and environmental criteria (IBAMA List, MTE List and/or Geo List).

The reinstatement of farms classified as "blocked" is the sole responsibility of the corporate Sustainability area of JBS, against production of documents and evidence submitted by the supplier, that justify the reinstatement.

Furthermore, JBS complies with the requirement of the Ministry of Agriculture, Livestock Farming and Supply (MAPA) to inspect the transportation of animals, acquiring only those animals for which an Animal Transportation Permit (GTA) has been issued.

# V) Procedures

Phase 1 - Evaluation of the Cattle Purchasing System and barring of suppliers

# Step 1 - Selecting the sample

Audit assurance is confined to the procedures of the benchmark protocol used ("Term of Reference for Third-Party Audits", mutually agreed by the Non-Governmental Organization Greenpeace and the signatory companies).

Audit assurance is by sampling based on checking documents and the information collated in the interviews with the Sustainability and Cattle Procurement areas. The documents analyzed are described in table 1 below.

Table 1. Checklist of documents analyzed

Document Name	Coverage period / code and version		
Term of Reference for third-party Audits 2017	2017	Υ	
Purchase records	Information about cattle purchases from all units, from January 1 to December 31, 2017		
Monitoring System	System of the specialized geospatial monitoring company	Y	
Barring System	ERP System / performance verified during the audit	Υ	
List of Suppliers	Information about cattle purchases from all supply farms located in the Amazon Biome, for the period from January 1 to December 31, 2017	Y	
Public list of embargoed properties – IBAMA	Query on the website: http://servicos.ibama.gov.br/ctf/publico/areasembargadas/Cons ultaPublicaAreasEmbargadas.php	Y	
Public List of people/companies – slave labor – MTE	Employers' registration list - Interministerial Ordinance No. 2 dated May 12, 2011. Update: lists updated on April 24, 2017; April 25, 2017; May 11, 2017; June 23, 2017; June 27, 2017; October 27, 2017; November 22, 2017; and November 14, 2017.		
List of Suppliers Approved / Blocked following the geospatial monitoring	Lists of supply farms with "Approved" and "Blocked" status prevailing at the time when the cattle purchase orders were issued (January 1 to December 31, 2017)	Y	

This evaluation was carried by examining documentation; accessing data systems and interviews with employees, using as reference documents:

- "Minimum Criteria for Transactions with Cattle and Beef Products on an Industrial Scale in the Amazon Biome", Greenpeace.
- "Term of Reference for Third-Party Audits 2017 of the Public Livestock Commitment".

The methodology defined for this evaluation was applied to all units that purchase cattle from suppliers that are also located in the Amazon Biome: Alta Floresta/MT, Água Boa/MT, Araputanga/MT, Araguaína/TO, Barra do Garças/MT, Confresa/MT, Colider/MT, Diamantino/MT, Juara/MT, Juína/MT, Marabá/PA, Pedra Preta/MT, Pontes e Lacerda/MT, Pimenta Bueno/RO, Porto Velho/RO, Rio Branco II/AC, Redenção/PA, São Miguel do Guaporé/RO, Santana do Araguaia/PA, Tucumã/PA and Vilhena/RO.

According to the Term of Reference for Third-Party Audits 2017, during the analysis of the documents for the period from January 1 to December 31, 2017, a sample of 10% was taken from all cattle purchase transactions within the Amazon biome, for each unit, resulting in a sample of 9,968 transactions to be assessed, which includes:

- 400 of the 3,993 purchase orders in Alta Floresta/MT;
- 530 of the 5,293 purchase orders in Água Boa/MT;
- 765 of the 7,645 purchase orders in Araputanga/MT;

- 105 of the 1,049 purchase orders in Araguaína/TO;
- 962 of the 9,620 purchase orders in Barra dos Garças/MT;
- 668 of the 6,676 purchase orders in Confresa/MT;
- 405 of the 4,041 purchase orders in Colider/MT;
- 567 of the 5,660 purchase orders in Diamantino/MT;
- 722 of the 7,219 purchase orders in Juara/MT;
- 546 of the 5,451 purchase orders in Juína/MT;
- 283 of the 2,830 purchase orders in Marabá/PA;
- 534 of the 5,343 purchase orders in Pedra Preta/MT;
- 857 of the 8,567 purchase orders in Pontes e Lacerda/MT;
- 368 of the 3,672 purchase orders in Pimenta Bueno/RO;
- 257 of the 2,567 purchase orders in Porto Velho/RO;
- 307 of the 3,066 purchase orders in Rio Branco II/AC;
- 179 of the 1,784 purchase orders in Redenção/PA;
- 604 of the 6,043 purchase orders in São Miguel do Guaporé/RO;
- 250 of the 2,502 purchase orders in Santana do Araguaia/PA;
- 184 of the 1,838 purchase orders in Tucumã/PA;
- 475 of the 4,742 purchase orders in Vilhena/RO.

On October 9, 2018, a professional information technology (IT) specialist of DNV GL personally audited the IT department of JBS to check the integrity of the cattle purchase records for the period audited. It was at this time that the printout from the cattle purchase transactions report was analyzed, confirming that the programming language did not contain filters or biases that might influence the print out of that report.

In the corporate offices of JBS and Agrotools in São Paulo/SP, the mechanisms of the Socioenvironmental Monitoring System of the farms that supply JBS were presented, in addition to the procedures and workings of the Geospatial Monitoring undertaken by the geomonitoring contractor (Agrotools). The selected sampling of the cattle purchase transactions was evaluated according to the IBAMA list of embargoed areas, the slave labor list of the Ministry of Labor and Employment (MTE list), and the geomonitoring list (Geo list) involving deforestation (PRODES and DETER) and trespassing on environmental conservation units and/or Indigenous lands.

# Step 2 - Testing the cattle purchasing system

In the case of all the JBS meat units that purchased cattle from the supply farms located in the Amazon Biome, the sample purchases (representing at least 10% of the cattle purchased between January 1 and December 31, 2017) were cross-checked against the CPF/CNPJ numbers on the IBAMA List, the MTE List (lists updated on April 24, 2017; April 25, 2017; May 11, 2017; June 23, 2017; June 27, 2017; October 27, 2017; November 22, 2017; and November 14, 2017) and the Geo list of the geospatial surveillance company (Lists of Farms Approved and Blocked in force at the time of the generation of cattle purchase orders).

By analyzing documentation, interviewing employees and accessing the JBS cattle purchase system, - in accordance with the procedures for audit checks - described in the Term of Reference - the results indicated in the sequence of the report were obtained.

Of the 9,968 cattle purchase transactions sampled, which correspond to 10% of total purchases in the period analyzed, from among the JBS meat units that acquired cattle from supply farms located within the Amazon biome, in accordance with the audit procedures, one (01) purchase from a farm on the IBAMA embargoed areas list was detected, which corresponds to 0.01% of total purchases included in the sample.

In the case of the MTE List, there were no purchases in the sample from any supplier appearing on the MTE Slave Labor List, according to the lists updated on April 24, 2017; April 25, 2017; May 11, 2017; June 23, 2017; June 27, 2017; October 27, 2017; November 22, 2017; and November 14, 2017. Therefore, no purchases were detected that violated the slave labor criterion.

Lastly, in the case of the criterion for geomonitoring of supply farms, there were no sample purchases from supply farms blocked on the date of the slaughter of the animals purchased, according to the geospatial monitoring list (Geo List). No sample purchases showed irregularities involving deforestation criteria (PRODES and/or DETER) and/or overlapping on protected areas (Indigenous Lands and/or Environmental Conservation Units). Thus, no cattle purchases were identified involving deforestation criteria, trespassing of Indigenous lands and/or environmental conservation units).

JBS can track 100% of its direct suppliers using Animal Transportation Guide (GTA), which is compulsory for cattle purchases; in addition, traceability also applies to the final product (raw beef), using a QR Code shown on the packaging of the final products sold, by which any consumer can check on the JBS site the origin of the product (list of the supply farms), showing the slaughter date and the SIF/MAPA (federal inspection) number of the JBS unit, thus enabling the products to be traced.

In the case of indirect suppliers, JBS has not yet been successful in implementing traceability processes. As a justification, the Company advised that the traceability of the cattle production chain, from birth to slaughter, is only possible with full access to all Animal Transportation Guide (GTAs) to identify the indirect supply chain. However, GTAs are not public documents and are for the sole use of the Ministry of Agriculture, Livestock Farming and Supply (MAPA). JBS and other industry players are already in touch with the MAPA to obtain access to the GTA data base, or have requested the MAPA to take into account the IBAMA and MTE Lists when issuing GTAs, but have had no success. Currently, JBS is a member of the Sustainable Livestock Work Group coordinated by the Ministry of the Environment of the Brazilian Government, which proposes actions to foster sustainability and control of the origin of the livestock productive chain, and develops solutions to control cattle origin and check compliance of rural property, among other activities linked to the prevention and control of deforestation and forestry degradation.

# Step 3 – Testing the system that debars non-compliant suppliers

In addition to the sampling of cattle purchase transactions above, remote simulations were carried out for the Juína/MT meat unit for purchases involving 30 supply farms with one of the restrictions, specifically: 10 farms whose taxpayer codes are on the IBAMA embargoed areas list, 10 farms whose taxpayer codes are on the slave labor list and 10 farms classified as "blocked" regarding geospatial monitoring (Geo List) chosen at random from among the cattle purchase transactions of JBS in the period between January 1 and December 31, 2017. The purpose of this sampling was to verify the possibility of the Company's procurement system accepting, without restrictions, cattle purchase transactions involving non-compliant suppliers blocked through geospatial monitoring involving deforestation (PRODES and DETER), Indigenous lands, environmental conservation units and which appear on the IBAMA embargoed areas list and the MTE list.

In all situations, the procurement system (ERP) did not permit any cattle purchases, displaying the automatic prohibition that makes it impossible to register the purchase order. This is due to tools used for proscribing non-compliant suppliers. The IBAMA and MTE lists are entered on a daily basis directly onto the Company's computer systems, while the supply farms classified as "blocked" on the geospatial monitoring list (Geo List) are also embargoed by the corporate sustainability area of JBS.

In the case of suppliers on the IBAMA list of embargoed areas, where properties other than those shown are concerned, each property is analyzed based on the name of the municipality, the name of the farm and, in some cases, the geographical coordinates of the embargoed area (when available) are cross-checked with the map of the farm from which it is intended to purchase cattle, evaluating whether the location of the embargoed points do not overlap with that farm. If there is proof that the property in question is not affected by the IBAMA prohibition, the supply farm is approved manually by the corporate Sustainability team for the purchase of cattle. All phases and files of this procedure are documented and archived.

# Stage 2 - The outsourced geomonitoring company.

# **Step 1 – Assurance of the procedures**

On October 9, 2018, Agrotools, the company carrying out the geospatial analyses for JBS, was visited by the DNV GL auditor to whom the processes para for obtaining these data were presented. During the visit, DNV GL was able to verify that the company is properly equipped to carry out the activities described, based on its Business purpose, its National Economic Classification Number (CNAE), Technical Responsibility at the Regional Engineering and Agronomy Council (CREA) and its experienced professionals. The ART (Technical Responsibility Note) for the activities carried out in 2017 contained the description of the scope performed by the 'Contractor' within the purview of the monitoring process, identifying the 'products' generated as well as the project documentation containing the scope of the activities, the operating plan and a technical description of the procedures for accessing, handling and use of the data bases referring to the criteria employed in the socioenvironmental analyses.

#### Step 2 - Simulated monitoring

Testing the monitoring system (Geo List) involved simulated monitoring of different farms that supply JBS. The process begins when Agrotools receives the data from JBS and validates it. In the event of any inconsistencies in the data, Agrotools forwards an "Anomaly Report" to JBS. Thereafter, the property is entered on the system which generates a GeoID, the property's geographical identity. Next, the geometry is analyzed against the defined socioenvironmental criteria, reporting any overlapping, as the case may be. The maps of the supply farms are provided by the suppliers and are based on official documents (Rural Environmental Register - CAR) registration number of the georeferenced property, etc.), which can be monitored, reported on and are verifiable, and Agrotools carefully evaluates the information received before analyzing the geometry, certifying that this information actually pertains to the supply farm to which the digital map refers. During the audit at Agrotools, tests were carried out on farms that supply JBS, chosen at random from the Geo List, covering both proscribed and approved suppliers, to evaluate how the deforestation monitoring system functions (10 properties), trespassing on Environmental Conservation Units (10 properties) and trespassing on Indigenous Lands (10 properties), totaling 30 supply farms simulated. All results were compatible with each property on the Geo List, thereby confirming that the geomonitoring system functions.

#### Phase 3 - Land use and environmental regularization of the supplier chain

Information, concerning land use and environmental regularization of the supply farms based on checking a range of related documentation such as the CAR or the LAR/LAU/APF and the CCIR, is collated as follows:

- Information about the Rural Environmental Register (CAR) and the Rural Environmental Permit (LAR) or the Provisional Approval to Engage in Rural Activity (APF), or, in addition, the LAR filing protocols is obtained by presenting those documents.
- Information about the enrolment number on the National Rural Registration System (SNCR) and the environmental permit number is obtained by presenting those documents.

The LAR of the supply farms (characterized as farming activity) also requires proper regulations on the part of the official entities and instruments that enable their application in different Brazilian states. With the exception of the State of Pará, which has created new regulations e and an integrated system enables producers to regularize their situation in relation to rural environmental permits of the property, and where the presentation of the LAR in the case of properties of 3,000 hectares or more is mandatory for all registers of JBS suppliers. In the case of the Rural Environmental Register – CAR, under the new Brazilian Forest Code (Law No. 12.651, of May 25, 2012), all producers must enroll on it by December 2018.

During the audit, 25 properties were selected for CAR verification, among which:

- Two properties have no information about registration with CAR (8% of the sample);
- The CAR of one property has a "cancelled" status (4% of the sample);

- The CAR registration number shown in the CAR document of one property differs from that shown in JBS's records (4% of the sample).

The other 21 cases (84% of the sample) were fully in compliance.

We highlight that, according to a federal decree, Brazilian rural properties must register with CAR until December 31, 2018.

Four properties have areas greater than 3,000 ha. However, it was not possible to evidence their environmental license. None of these properties is located in the State of Pará, where LAR is regulated.

# VI) Results of the audit process

Based on the sample of the cattle purchase transactions analyzed, out of a total of 9,968 purchases, one (1) irregular cattle purchase transaction was identified, representing 0.01% of total purchases in the sample. There was no evidence about irregular purchase transactions as per the "Slave Labor" list, or purchase transactions with suppliers included in the Geo list (deforestation and trespassing of Indigenous lands and/or environmental conservation units).

#### 1. Access to Information

The documents described in table 1 (page 5) were analyzed.

#### 2. Non-conformities:

- Indirect suppliers of cattle to JBS are not yet checked systematically, since JBS has not yet managed to adopt auditable procedures for its indirect suppliers;
- One (01) purchase transaction was identified with a supplier appearing on the IBAMA embargoed areas list, corresponding to 0.01% of total purchases of the sample.

# 3. Notes:

- The CAR of one property differs from that shown in JBS's records (wrong CAR code, equivalent to 4% of the sample).
- Out of 25 cattle suppliers included in the sample, two (8%) are not registered with CAR, and the CAR registration of 1 supplier (4%) was cancelled.

# VII) Audit Restrictions

No restrictions were encountered on access to the information in this audit. However, the audit is confined to assuring the cattle purchase process and the Socioenvironmental Monitoring System for the Supply Farms put in place by JBS, bearing in mind the sampling process described in this report, in accordance with the Term of Reference for Third-Party Audits.

# **VIII) Conclusions**

Based on the verification carried out, on the findings detailed in the previous chapter of this report, we wish to highlight the following main conclusions of this evaluation regarding adherence of JBS to the "Public Livestock Commitment":

- 1. Out of a total of 9,968 cattle purchase transactions by JBS, originating on supply farms located within the Amazon Biome in the period from January 1 to December 31, 2017:
  - 1.1 No irregularities were detected involving slave labor criteria.
  - 1.2 Irregularities were not detected based on the deforestation criteria (PRODES deforestation for the period from 2009 to 2017).
  - 1.3 No irregularities were detected involving the criteria for trespassing on protected areas (Indigenous Lands and Environmental Conservation Units).
  - 1.4 Irregularities were detected in one (01) purchase, using the criteria for the IBAMA embargoed areas, corresponding to 0.01% of total purchases in the sample. 1.5 Cattle purchase transactions achieved a regularity level of 99.99%.
  - 1.6 Irregular cattle purchase transactions accounted for 0.01%.
- 2. Documentary control when cattle are delivered to the meat plants, using Animal Transportation Guide (GTA), with high information requirements, without which the animals received from the supplier are not admitted. This ensures the traceability of 100% of the cattle slaughtered from direct suppliers.
- 3. Regarding indirect suppliers, JBS does not yet have in place a verification system in these cases.

São Paulo, October 17, 2018.

Felipe Lacerda Antunes - DNV GL Auditor

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# **TABLES**

Table 1 - Total purchases and sampling

1 - Total purchases and sampling (base year 2017)					
Total raw material purchases originating in the Amazon Biome and made by JBS in the period between January 1 and December 31, 2017	Total purchases sampled for carrying out the analyses presented				
99,601	9,968				

Table 2 - Non-conformities encountered during the audit period

2 - Non-conformities (base year 2017)						
Criterion	Total non- conformities	% of non- conformities to the total purchases in the base year	% of non- conformities to the total purchases in the sample			
Purchases of raw materials from properties on which deforestation was detected after October/2009	0	0	0			
Purchases of raw materials from properties that overlap on Indigenous Lands	o	0	0			
Purchases of raw materials from properties blocked for being located on Environmental Conservation Units	0	0	0			
Purchases of raw materials from properties blocked for being located on the MTE List	o	0	0			
Purchases of raw materials from properties embargoed for being located on the IBAMA List	1	0.001	0.01			
Purchases of raw materials from properties blocked for other criteria provided for in the commitment and not described above (specify)	0	0	0			

Table 3 – Debarment test results

3 - Debarment test						
	Total number of simulated purchase tests on the Company's system	Conformed	Did not conform			
IBAMA	10	10	0			
MTE	10	10	0			
GEO (PRODES, DETER, TI and UC)	10	10	0			

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