



# Compliance & Integrity

Initiatives

December 2024



# 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 in each Business Unit in Brazil and one to oversight 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)  
**1º Compliance Day** occurred at JBS headquarter in Brazil



SEP

**Third Party Training** Project started with business units

OCT

**Compliance communication new campaign** for Ethics Line  
**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 2<sup>o</sup> 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**

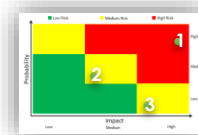
JUN

Launched the **Antitrust Global Policy**

**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

**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

SEP

**2022 external audit finalized** without material issue identified

OCT

Launched **Diversity & Inclusion** training for all administrative team members and the **Code of Conduct and Ethics** training for all team members in Brazil

3<sup>o</sup> wave of **Conflict of Interests survey** with Managers, Directors, Presidents

NOV

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

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

DEC

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 Hospitality 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

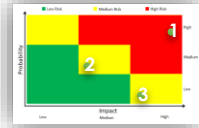
AGO

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**

# 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

# Compliance Milestones 2024

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 and approximately **30,000** administrative 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

- ✔ 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**



# 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



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## Compliance

A JBS está empenhada em garantir um ambiente ético, íntegro e em conformidade com as leis aplicáveis no dia a dia dos seus negócios. O Código de Conduta e Ética está alinhado com a Missão e Valores da Companhia



# 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



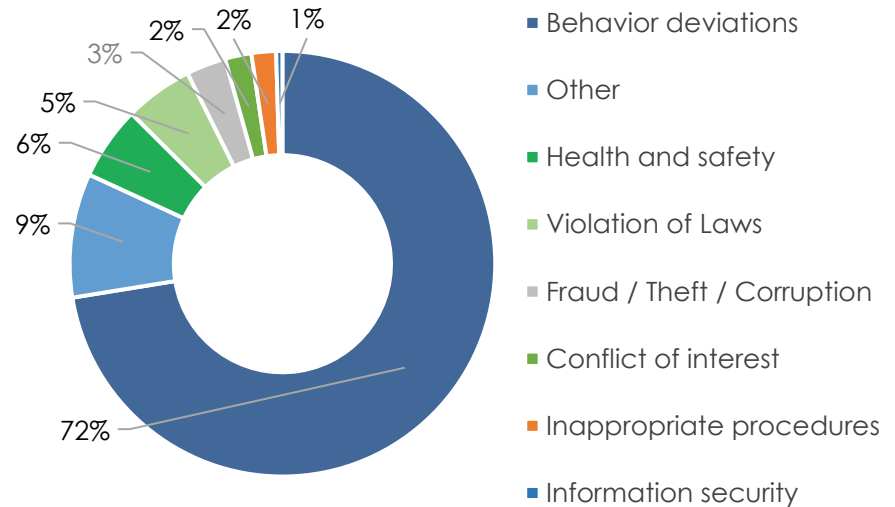
# JBS Ethics Line

Channel implemented in December 2017;

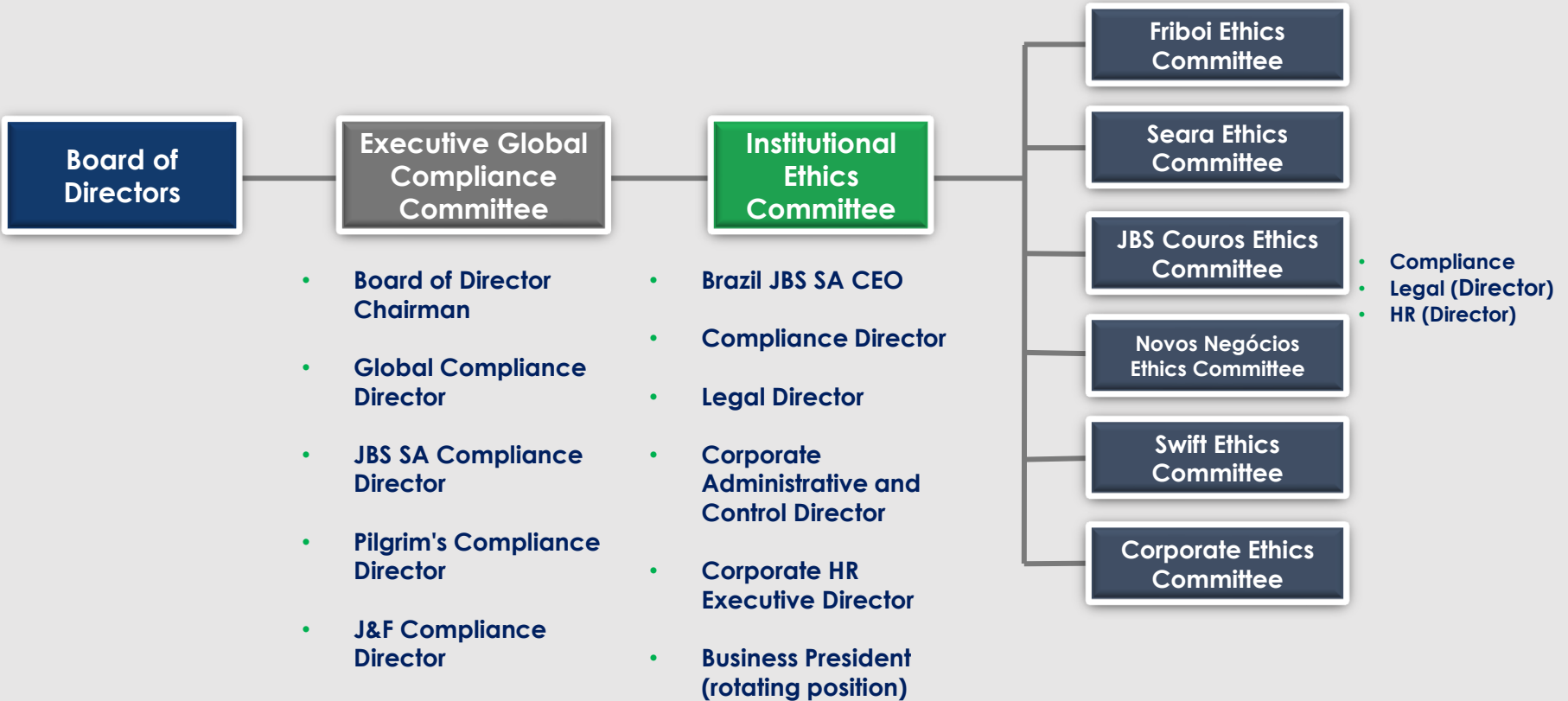
Available for employees and third parties, 24 hours a day, 7 days a week, and in 4 languages



## CATEGORIES



# 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.

## Internal Departments

### Human Resources

- Conducting Internal Investigations on HR-related topics
- Support in the training agenda

### Internal Audit

- Compliance Program Auditing
- Test of internal controls
- Policies Review and approval
- Sharing information on non-compliance with the Code of Conduct and Ethics, Global Anti-Bribery and Anti-Corruption Policy and other policies related to the Compliance Program

### Legal

- Compliance Program initiatives Support
- Inclusion of a standard integrity clause in third-party contracts
- Sharing information on non-compliance with the Code of Conduct and Ethics, Global Anti-Bribery and Anti-Corruption Policy and other policies related to the Compliance Program

## External Resources

### White & Case LLP

### Ernst & Young Consulting

- Consulting for the improvement of the Compliance Program

### ICTS/ALIAN

- Provision of services by the JBS Ethics Line

### DOT Digital Group

### IPRC - Behavioral Risk Research Institute

- Support in the production of Compliance training

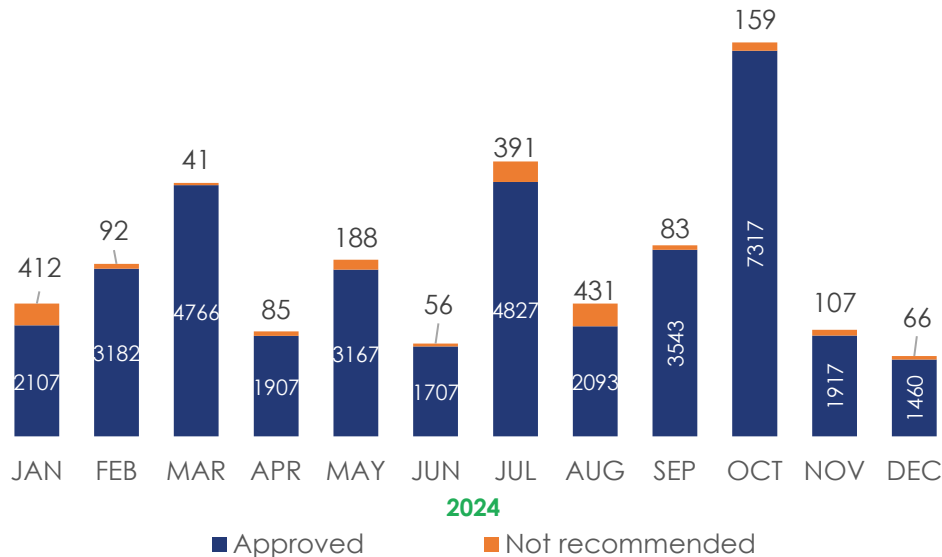
### Lexis Nexis Risk Solutions

- Support in data analytics services, insights and fraud prevention

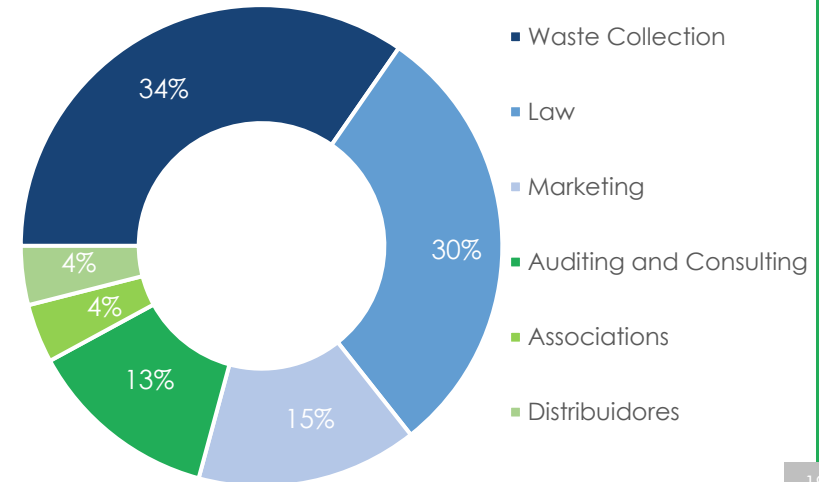


# Third-Party Due Diligences

**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** Edition 12 April 2020 **RIGHT**

**COMPLIANCE JOB CHALLENGES**

**TRANSFORM TO A NEWER METHOD!**

**NEW POLICIES ARE COMING!**

**COMPLIANCE CHALLENGES ON 2020 CHALLENGE.**

**JBS ETHICS LINE**

**COMPLIANCE NEWS** Edition 13 February 2020 **RIGHT**

**COMPLIANCE AT THE 2020 BEANS CONVENTION**

**ON THE ISSUES**

**NEW PHASE OF COMPLIANCE RISK ASSESSMENT**

**ENDING OF THE JBS ETHICS LINE CAMPAIGN**

**JBS ETHICS LINE**

**COMPLIANCE NEWS** Edition 14 April 2020 **RIGHT**

**ONE MORE GLOBAL POLICY: THE ANTI-CORRUPTION POLICY**

**TIME AT THE TOP**

**GUILHERME MOTTA, PRESIDENT OF JBS LEATHER, COMMENT ON THE RELEVANCE OF COMPLIANCE FOR CONDUCTING BUSINESS**

**MARBA AND COMPLIANCE, TOGETHER**

**COMPLIANCE AREA IMPLEMENTED CONTROLS THAT SECURE BUSINESS OPERATIONS**

**JBS ETHICS LINE**

**COMPLIANCE NEWS** Edition 15 April 2020 **RIGHT**

**COMPLIANCE CHALLENGES IN TIME OF CRISIS**

**BE TRUTHFUL AND BE CONCERNED.**

**JBS ETHICS LINE**

**REMEMBER JBS' POLICIES AND PROCEDURES**

**JBS COMPLIANCE: FINALIST IN A LEADERS LEAGUE'S AWARD**

**JBS ETHICS LINE**

**COMPLIANCE NEWS** Edition 16 May 2020 **RIGHT**

**JBS LEADER, WE COUNT ON YOU**

**JBS ETHICS LINE**

**THIRD PARTY REPUTATIONAL EVALUATION SOFTWARE INCREASINGLY MORE INTELLIGENT**

**GOOD DEEDS ARE GOOD**

**JBS ETHICS LINE**

**COMPLIANCE NEWS** Edition 17 April 2020 **RIGHT**

**IVAN BORGHESE, DIRECTOR OF THE IN NATURA BUSINESS OF BEANS, HIGHLIGHTS THE RELEVANCE OF COMPLIANCE**

**2020 TRAINING CYCLE**

**ETHICS AND COMPLIANCE IN THE 2019 ANNUAL AND SUSTAINABILITY REPORT**

**INSTITUTO ETHOS - FACING THE PANDEMIC WITH SOCIAL RESPONSIBILITY AND SUSTAINABILITY REPORT**

**JBS ETHICS LINE**

**COMPLIANCE NEWS** Edition 18 April 2020 **RIGHT**

**A NEW VERSION OF THE CODES OF CONDUCT IS COMING**

**HAVE YOU DONE YOUR ANTI-CORRUPTION TRAINING?**

**DANIEL DE AVILA, EXECUTIVE DIRECTOR OF OPERATIONS AT FIBRO, TALKS ABOUT COMPLIANCE AND EFFICIENCY**

**3 YEARS OF THE ALWAYS DO IT RIGHT PROGRAM**

**JBS ETHICS LINE**

**COMPLIANCE NEWS** Edition 19 April 2020 **RIGHT**

**COMING SOON: IMPROVED VERSIONS OF CODES OF CONDUCT**

**WHAT HAS CHANGED?**

**GLOBAL VALIDITY AND MOBILE VERSION**

**2020 TRAINING CYCLE**

**CODE OF CONDUCT TRAINING AND IMPLEMENTATION**

**JBS ETHICS LINE**

# Compliance News

# Controls and Monitoring

Implemented to prevent and detect corruption focus on JBS Compliance Program

**+980**

**Companies and individuals blocked (Watch List)**



Related direct or indirect in J&F executives plea-bargain

**+700**

**Monitored companies and individuals (Yellow List)**



Involvement in suspected and/or non-compliance activities

**18**

**Preventive and Detective controls**

















Follow the money

- ❖ 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	Published	
Sponsorships		
Donations		
Conflict of Interests		
Gifts, Entertainment and Hospitality		
Due Diligence		
Ethics Line		
Consequences		
Relationship with Government Agents		
Antitrust		
Global Compliance		
Local Compliance		
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](http://www.jbs.com.br/compliance)

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

