

IN-GLOBAL-RH-0192 November 13, 2024 Review: 01

Global Human Rights Policy

RECIPIENTS: All JBS S.A. team members and its non-listed subsidiaries.

1. OBJECTIVE

JBS is committed to respecting human rights. This Global Human Rights Policy ("Policy") affirms JBS S.A.'s, and its controlled companies and unlisted subsidiaries (collectively referred to herein as, "JBS" or "Company"), commitment to respect human rights and the applicable laws and regulations prevailing in the countries where the Company does or intends to do business.

2. SCOPE

- 2.1. This Policy applies to all JBS employees, regardless of geography and location. Additionally, JBS expects its business associates to uphold these principles and comply with the <u>JBS Business</u> Associate Code of Conduct and all applicable laws and regulations;
- 2.2. This Policy supersedes all prior versions of the JBS Global Human Rights Policy;
- 2.3. In the event there are specific legal or regulatory requirements applicable in a specific geography, an addendum to this Policy in that geography will be written and adopted to comply with those requirements.

3. RESPONSIBILITIES FOR COMPLIANCE

All areas involved in the process and mentioned in this document is responsible to comply with this normative instruction.

4. APPROACH

- 4.1. JBS adheres to the applicable laws of the countries in which it operates, and this Policy formalizes JBS' commitment to respect human rights. JBS communicates its human rights expectations, as set forth in this Policy, to its employees through the JBS Code of Conduct. JBS also communicates these expectations to its business associates through the JBS Business Associate Code of Conduct, which helps foster respect for human rights throughout JBS' supply chain;
- 4.2. JBS is committed to periodically assessing its business practices and evaluating its alignment to internationally recognized human rights to avoid adverse impacts on individuals throughout its operations and supply chain.

5. PRINCIPLES

- 5.1. This Policy and its guiding principles are based on, among other things, those contained in the United Nations' ("U.N.") International Bill of Human Rights, and the International Labor Organization's ("ILO") Declaration on Fundamental Principles and Rights at Work;
 - 5.1.1. Workplace Health & Safety: JBS is committed to providing a safe and injury-free workplace. To aid in this commitment, JBS provides employees with all the necessary and appropriate personal protective equipment, training, and equipment to effectively perform



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their assigned job task(s). JBS regularly assesses its safety program with a focus on injury prevention and the development of a safety culture, and has systems in place to prevent and respond to potential risks to the health and safety of its employees;

- 5.1.2. Anti-discrimination: JBS values diversity in the workplace, and does not discriminate on the basis of age, color, disability, family or marital status, gender, national origin, or any other characteristic protected by applicable law, regulation, or ordinance. The Company's prohibition on discrimination extends to all recruiting, hiring, promotion, training, compensation, termination, and other employment decisions;
- 5.1.3. Anti-harassment/Inhumane Treatment: employees are expected to treat each other, customers, and suppliers with fairness, respect, and dignity. JBS is committed to providing a workplace free from all forms of bullying, intimidation, harassment, or inhumane treatment including, physical, psychological, sexual, or verbal mistreatment;
- 5.1.4. Freely Chosen Employment (employment status and freedom of movement): all employment with JBS is freely chosen, and no means of coercion, such as intimidation or threats, shall be used to pressure an applicant or employee into accepting a job, remaining in a job, or terminating their employment. Employees' freedom of movement shall not be restricted by JBS through confinement, imprisonment, or detention either during or outside of working hours;
- 5.1.5. Lawful and Ethical Recruitment: JBS shall employ workers who are legally authorized to work in their location and facility, and validate employees' eligibility to work. Based on the principle that no one should pay to work for JBS, the Company prohibits the use of unlawful fees incurred in the recruitment process in order for workers to secure employment;
- 5.1.6. Prohibition on Modern Slavery: JBS condemns the use of modern slavery, including any exploitive labor practices, such as human trafficking, and forced, indentured, prison, or slave labor;
- 5.1.7. Child Labor: JBS does not permit the illegal use of child labor. A child is any person under the minimum employment age according to the laws of the facility's location. Regardless of local laws, employees under the age of eighteen (18) shall not perform hazardous work, overtime, or night-shift work;
- 5.1.8. Compensation and Benefits: JBS is committed to paying team members in compliance with all applicable wage and hour laws, rules, and regulations, such as those associated with overtime work, premium or sick pay requirements, and all legally mandated benefits. Where there are no legal requirements, JBS strives to meet industry wage and benefits standards. The Company compensates its employees for all work completed, promptly provides that compensation, and includes a wage statement that can be used to verify compensation. JBS prohibits the deduction of wages as a disciplinary measure, and does not withhold wages unless permitted by law or by an applicable collective agreement, or by a lawful agreement with the Employee;
- 5.1.9. Working Hours: employees' combined regular and overtime working hours shall comply with all applicable laws and collective agreements. JBS strives to conduct its operations



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to limit overtime to a level that ensures humane working conditions. Only where permitted by local law or any applicable collective agreement, may employees be directed to work on rest days;

- 5.1.10. Employee Data Privacy: JBS understands its privacy obligations towards the collection, use, and disclosure of personal information in relation to its employees, and is committed to complying with all applicable privacy laws and regulations;
- 5.1.11. Freedom of Association/Collective Bargaining: in many of the locations where JBS operates, employees have the right to freely associate or not associate with third-party groups. JBS respects the rights of its employees to freely associate and bargain collectively, as permitted by and in accordance with all applicable laws and regulations. JBS is committed to fostering an environment of open communication where employees can speak with management regarding work conditions or management practices without fear of retaliation, reprisal, harassment, or intimidation;
- 5.1.12. Provision of Information: employees have the right to understand their rights under all applicable local laws. JBS, where required by law, displays postings of these rights in common areas throughout the facility. JBS provides its employees with written and understandable information in multiple languages about company culture, general policies, safety, and other employment conditions at the time of hire;
- 5.1.13. Anti-retaliation: as detailed in JBS' <u>IN-PRESI-CPL-0158 Global Non-Retaliation Policy</u>, the Company is committed to creating and maintaining an ethical workplace where employees can report their concerns and engage in protected activities without fear of retaliation. JBS does not tolerate any act of retaliation against employees who report, in good faith, any potential violations of law, regulation or policy or other misconduct, or who engage in protected activities.

6. PROCESSES

- 6.1. Human Rights Due Diligence: JBS recognizes that its commitment to respect human rights is a continuous process, which requires the periodic assessment of its policies, procedures, and the human rights impacts of its operations;
- 6.2. Reporting/Grievance Mechanism: JBS has an open-door policy and encourages employees to report grievances and potential violations of law, regulations or policy to members of management; the Human Resources, Legal, or Ethics & Compliance Departments; or through the JBS Ethics Line. The Ethics Line is available 24 hours/day, 7 days/week in multiple languages for both employees and external third parties, and is hosted by an external third-party service provider. For those who chose, the Ethics Line allows anonymous reporting of any suspected violations of laws, regulations, and Company Policies or Procedures;
- 6.3. Remediation. JBS promptly reviews and investigates reported allegations. Where appropriate, the Company will take remedial action to address reported violations.



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7. HUMAN RIGHTS GOVERNANCE STRUCTURE

The People and Opportunities Committee of JBS S.A.'s Board of Directors is responsible for oversight of this Policy. Implementation and enforcement of this Policy will generally be carried out through the Company's Legal, Ethics & Compliance, Sustainability, and Human Resources Departments. The integration of this Policy into the Business Associate Code of Conduct and third-party enforcement of this Policy will be facilitated by the JBS Ethics & Compliance Department in partnership with the Company's Business Units and Legal Department.

8. TRANSPARENCY

JBS reports on its human rights efforts in its annual Sustainability Report.

9. ETHICS LINE

If you are aware of or suspect a violation of law or regulations, the Code of Conduct, or our policies, you are expected to immediately report these concerns to us. We want employees, in good faith, to raise their concerns and report any conduct to us that is or even could be a violation (even if an employee is unsure), and know that they will not be retaliated against in any way for doing so, as prescribed in JBS' IN-PRESI-CPL-0158 - Global Non-Retaliation Policy. You can submit an Ethics Line report by web, phone, or text:

http://jbsethicsline.jbssa.com http://linhaeticajbs.com.br http://pilgrimsethicsline.pilgrims.com

SMS Intake Number: 970-432-2067

Phone:

Argentina: 0800 666 1659
Brazil: 0800 377 8055
Uruguay: 000 401 90861
All others: 1-800-492-3981

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Normative instruction approved by the Board of Directors at a meeting held on November 13, 2024.