



# BUSINESS ASSOCIATE CODE OF CONDUCT





BUSINESS  
**ASSOCIATE**  
**CODE OF**  
**CONDUCT**



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## BUSINESS ASSOCIATE CODE OF CONDUCT

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# BUSINESS ASSOCIATE CODE OF CONDUCT

JBS is committed to conducting its business ethically and with integrity and expects Business Associates to demonstrate the same commitment. All Business Associates agree to follow the guidelines of this Business Associate Code of Conduct (the “**BACC**”).

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## **COMPLIANCE WITH THE LAW**

Business Associates must fully comply with applicable legislation, rules and regulations. The BACC must be read and interpreted in conjunction with current legislation, considering the place and contractual arrangement with the Business Associate. If compliance with the BACC would result in a violation of law or local regulations, the Business Associate must follow the law or local regulation.

## **FOOD SAFETY AND PRODUCT QUALITY**

JBS commits to providing safe and high-quality food products. Likewise, Business Associates must also meet the industry's best practices and standards in regard to food product safety and quality, complying with all JBS and government standards and requirements.

## **ANIMAL WELFARE**

Business Associates must use humane procedures to prevent the mistreatment of animals and ensure the proper handling and slaughter of animals, in accordance with legal requirements and best market practices.



## **ANTI-BRIBERY AND ANTI-CORRUPTION**

JBS has zero tolerance for any form of bribery or corruption. Business Associates must comply with all applicable anti-bribery and anti-corruption laws.

Business Associates and those acting on their behalf may not directly or indirectly offer, promise, authorize, recommend or receive Anything of Value from anyone if it is intended or could appear as intended to induce or reward improper action or to obtain or retain undue advantages/benefits for JBS, the Business Associate or a third party.

Business Associates are also prohibited from making a facilitation payment. A facilitation payment is typically a payment to a Government Official to speed up or secure routine government actions.

## **GIFTS AND ENTERTAINMENT**

Giving gifts and entertainment for legitimate business purposes must be reasonable and well mannered. Gifts in cash or equivalents are not allowed. Limits for this practice are available upon request in each region where JBS operates.

Business Associates must not offer or accept gifts and entertainment on behalf of JBS.





## **CONFLICT OF INTEREST**

A conflict of interest may arise whenever the personal or professional interests of an individual or group of individuals are potentially at odds with the best interests of JBS.

Business Associates shall disclose to JBS all actual or potential conflicts of interest arising from either personal or business relationships with JBS employees or others that conduct business with JBS.

## **POLITICAL CONTRIBUTIONS**

Business Associates shall not make political contributions to any candidate for public office, elected official, political party or committee on behalf of or as a representative of JBS. Business Associates shall not express any political views on behalf of JBS.

## **FAIR COMPETITION**

Business Associates shall not engage in any conduct that may undermine free and fair competition, such as entering into agreements with other companies or manipulating bids. They must comply with all laws regarding fair competition and antitrust in the jurisdictions in which they conduct business with or on behalf of JBS.





# LABOR RULES AND IMMIGRATION

Business Associates must comply with all labor laws, such as compensation, working hours and non-discrimination hiring laws.

Business Associates must respect the right of workers to form or join a union or bargain collectively.

JBS values diversity in the workplace and encourages Business Associates to embrace diversity in their business practices.

Business Associates must only employ individuals who are legally authorized to work in the country where they are seeking employment.

# HARASSMENT

Business Associates must provide a non-violent work environment free of threats or intimidation. Any form of bullying or sexual harassment shall not be tolerated.



## HUMAN RIGHTS

Business Associates shall not use slave, child or forced labor and must recognize that all persons are equal before the law and are entitled, without any discrimination, to equal protection against any discrimination or incitement that violates the Universal Declaration of Human Rights.

## HEALTH AND SAFETY

Business Associates must comply with all safety and health laws, rules and regulations in the jurisdiction where they conduct business. Business Associates must take reasonable measures to prevent workplace hazards.

## INFORMATION CONFIDENTIALITY AND DATA PRIVACY

Business Associates may only use confidential JBS information to perform work on behalf of JBS and shall not disclose the information unless required by law.

Business Associates must follow all laws and regulations regarding the privacy of individuals, including employees and customers. Personal information should not be



disclosed to anyone outside of JBS, except for legitimate business purposes, in accordance with the applicable legislation or as required by legal or regulatory processes.

Business Associates shall not communicate publicly about JBS's business or the goods or services being provided to JBS without specific authorization.

## INSIDE INFORMATION

Business Associates may gain access to non-public information acquired through the Business Associate's relationship with JBS ("**Inside Information**"). Business Associates are prohibited from buying or selling securities while in possession of Inside Information or communicating to others Inside Information.

## SUBCONTRACTING

Business Associates can only subcontract someone if permitted by the agreement. If the subcontracting does take place, the guidelines of the BACC must be accepted and complied with by the subcontracted persons, under the responsibility of the Business Associate.





# ANTI-MONEY LAUNDERING AND COMBATING THE FINANCING OF TERRORISM

Business Associates must comply with all Anti-Money Laundering and Combating the Financing of Terrorism laws.

# INTERNATIONAL TRADE CONTROLS

Business Associates must comply with all laws regarding international trading, as well as take measures to ensure that there are no trade embargoes and economic sanctions that prohibit or restrict business activities with certain countries, organizations, entities and individuals.

# PROTECTING PROPERTY

JBS’s Property may only be used for JBS business. Business Associates must safeguard and protect it from theft, waste, cyberattack or other threat of loss.



To the extent a Business Associate has access to a JBS email system or another form of electronic communication system, anything generated, received by or stored in one of these systems is property of JBS and can be monitored.

## BOOKS AND RECORDS

Business Associates shall maintain accurate books and records relating to the business activities conducted for or on behalf of JBS.

## ENVIRONMENT AND SUSTAINABILITY

Business Associates must comply with all applicable environmental laws and regulations in the jurisdiction where the Business Associate operates. Business Associates must meet the sector’s best practices and standards, managing the environmental impact of its operations in compliance with pertinent regulations.



# REPORTING REQUIREMENTS

Business Associates must notify JBS, if permitted by law, regarding (1) the receipt of any subpoena, regulatory request, media inquiry or other third party request concerning JBS; and (2) any concerns, allegations of investigations or suspected violations of any law or regulation that relate JBS’s business or a violation of the BACC.

Nothing in this section or the BACC is intended to require reporting in violation of applicable local law or regulation.

JBS strictly prohibits retaliation against anyone who makes an honest and good faith report about a known or suspected violation of the BACC, law or regulation.

See Appendix A for information on accessing JBS Hotline Channel.

# DEFINITIONS

**“Anything of Value”** includes not only obvious bribes in the form of cash and kickbacks (e.g., rebating a portion of a contract payment to third parties or using consulting agreements to funnel payments to third parties), but also undue benefits in the form of gifts, educational assistance, loans, discounts, travel and entertainment expenses, health care, business opportunities, favorable





contracts, economic rights or any other mechanism that could be used to transfer value.

**“Business Associates”** means all suppliers, clients or other third parties who help JBS exercise its activities.

**“Government Official”** is broad and includes the following:

- a. Officers or employees of a government or any department, agency, or instrumentality thereof or of a public international organization, or any person acting in an official capacity for or on behalf of such person;
- b. Officers, employees or persons acting in an official capacity on behalf of a political party;
- c. Candidates for political office;
- d. Employees of a state-owned or state-controlled company, regardless of the employee’s position or activity;
- e. Employees, even non-remunerated ones, who have influence in business results;
- f. Any entity hired to review or accept bids for a government body or agency;
- g. Employees, whether elected, appointed or under a contract, permanent or temporary, who hold a legislative, administrative, or judicial position of any kind in a country or territory;
- h. Persons who perform public functions for the national, state or municipal governments of a country or territory or who exercise a public function for any public agency



- or public enterprise of such country or territory;
- i. Spouses and other family members of any of the persons listed above; and
- j. Actual family members.

**“JBS”** consists of JBS S.A. and all of its subsidiaries (entities directly or indirectly controlled by JBS S.A.) worldwide, except for publicly-held companies controlled by JBS S.A.

**“Property”** means all of JBS’s assets, including JBS funds, credit cards, equipment, electronic devices and systems.

# JBS' ETHICS LINE CHANNEL CONTACTS

## COMPLIANCE JBS S.A. JBS ETHICS LINE

If the complaint is related to JBS S.A. or its subsidiaries, use one of the following telephone numbers:

ARGENTINA	0800 666 1659
BRAZIL	0800 377 8055
URUGUAY	000 401 90861

Some countries have additional dialing requirements, and not all countries have phone numbers. Refer to the website [linhaeticajbs.com.br](http://linhaeticajbs.com.br) for further dialing instructions or to make a web-based report.

## COMPLIANCE JBS USA JBS ETHICS LINE

If the complaint is related to JBS USA or its subsidiaries, use one of the following telephone numbers:

### NORTH AMERICA

United States	1 800 492 3981
Canada	1 800 235 6302
Mexico	800 681 6945



# COMPLIANCE JBS USA JBS ETHICS LINE

## ASIA

South Korea

80 880 0476

Japan

800 170 5621

Taiwan

801 14 7064

China

400 120 3062

## AUSTRALIA

1 800 763 983

## NEW ZEALAND

0800 002 341

For different locations you can also make a web-based report at  
[jbsethicsline.jbssa.com](http://jbsethicsline.jbssa.com)

JBS ETHICS LINE



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