

JBS Group Labour & Human Rights Policy

INTRODUCTION

JBS Group's employees are of great value and the key to our success. JBS Group strives to provide a workplace where employees fulfil their potential in an open and inspirational working environment. We maintain a strong commitment to high standards that deliver a fair, respectable and safe workplace for all employees in the Group.

JBS respects the human rights of those around us, regardless of whether employed or not. JBS adheres to, and supports, the [International Bill of Human Rights | OHCHR](#), incorporating the [Universal Declaration of Human Rights | United Nations](#) (UN UDHR); Furthermore, we support the UN Global Compact and the Ethical Trading Initiative. We adhere to the 'Three pillars of Ruggie Principles': to Protect, to Respect and to Remedy.

The Ruggie Principles consist of 31 directives, framed in three main pillars:

- 1) the state duty to **protect against human rights abuses**,
- 2) the corporate responsibility to **respect human rights**, and
- 3) the need to **help victims achieve remedy**.

Supported by these three pillars, the Ruggie Principles propose that companies, in order to demonstrate and implement **respect for human rights**, take measures such as:

- Make a **public commitment to respect human rights**. (We do this at [JBS Group | Downloads](#))
- Identify, prevent, **mitigate, and account for, damage or damage caused to human rights**
- Dispose of procedures for remedying the negative consequences on human rights they cause or contribute to causing.

PURPOSE

The purpose of this policy is to define the labour and human rights standards to which all employees in JBS Group are entitled, irrespective of the country in which they work.

SCOPE

This policy applies to the management and employees of all entities in JBS Group. We expect and encourage our supply chain partners to adhere to and publish their similar human rights policies.

REQUIREMENTS

1. NON-DISCRIMINATION

1.1. JBS Group does not tolerate any form of discrimination against our employees based on race, colour, gender, language, religion, political or other opinion, caste, national or social origin, property, birth, union affiliation, sexual orientation, age, disability, or other distinguishing characteristics.

1.2. Any employment-related decisions, from hiring to termination and retirement, must be based solely on lawful, non-discriminatory criteria.

2. NO FORCED LABOUR

2.1. JBS Group does not tolerate any form of forced labour including bonded labour, indentured labour and slave labour, or human trafficking. Workers must be allowed to move around freely and leave their place of work when their working hours end.

3. NO CHILD LABOUR

3.1. JBS Group does not tolerate the hiring of child labour under any circumstances. The minimum age for full-time employment must be 15 or the legal minimum age for employment under Applicable Law, whichever is higher. The Group must not hire employees under the age of 18 for positions requiring hazardous work that could jeopardise health, safety or morals.

4. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

4.1. JBS Group must respect employees' rights to form, join or not join a labour union, or other organisation of their choice, and to bargain collectively in support of their mutual interests without fear of punitive actions such as intimidation, harassment or termination of employment.

5. NO HARASSMENT

5.1. JBS Group companies must protect workers from any acts of physical, verbal, sexual or psychological harassment, bullying, abuse or threats in the workplace by either their fellow employees or managers or customers.

6. WORKING HOURS, BENEFITS AND WAGES

6.1. JBS Group must adhere to the stricter of Applicable laws or industry standards, relating to minimum wages, working hours, overtime and benefits.

6.2. Employees must not be required to work more than 60 hours a week, including overtime, on a regular basis (or more than the limits on regular hours and overtime allowed by local laws and regulations).

6.3. Wages for overtime must be paid in legal tender on a regular basis. Wage deductions as a disciplinary measure must not be permitted unless provided for by national law. Employees must be entitled to at least one day off in seven, and must be given reasonable breaks while working and sufficient rest periods between shifts.

6.4. JBS Group must be committed to continuously developing employee skills and capabilities, and to providing opportunities for career advancement. Labour & Human Rights

Policy 4 6.5. In the event of major layoffs, JBS Group must, as a minimum, satisfy applicable laws and industry standards.

7. LEAVE

7.1. JBS Group must ensure that all employees have the right to sick leave and annual holiday, as well as parental leave - for employees who have to care for a new-born or newly adopted child as provided by national legislation. Employees who take such leave must not, as a result, face dismissal nor threat of dismissal.

8. EMPLOYEE CONTRACTS/LETTERS

8.1. All employees must be provided with a written, understandable and legally-binding employment contract/letter.

ROLES AND RESPONSIBILITIES

JBS Group HR: Owns, endorses and ensure the implementation of the policy.

JBS Relevant management: is Responsible for

- a) ensuring that this policy and related standards are implemented and adhered to,
- b) and that all relevant employees are made aware of the policy and its requirements;
- c) and ensuring local compliance with the policy (including adequate control measures to eliminate or reduce risks to express behaviours in breach with the policy.)
- d) and ensuring that JBS Procurement get our supply chain partners to implement their aligned human rights policies within their own organisations.

JBS Group HR:

- a) Drives the implementation of the policy,
- b) Provides specific advice on labour and human rights issues and dilemmas, and
- c) Ensures that labour and human rights issues are identified and addressed.
- d) Audits, reviews, measures and reports on labour and human rights performance.

JBS Management & all employees are Responsible for

- a) Adhering to this policy.
- b) Complying with the letter and spirit of the policy.
- c) Engaging and taking responsibility for ensuring that all initiatives are developed in line with the policy.

JBS Human Rights Policy Implementation:

In terms of implementing JBS Labour & Human Rights Policy, JBS HR commits to

- a) **Informing JBS staff as to their rights.** To this end JBS has drawn up and circulated various related policies:
JBS Equality, Diversity & Inclusion (EDI) Policy 2023
JBS Ethical (ETI) Code of conduct Policy

JBS Anti Harassment Policy

JBS Whistle Blower Policy 2023 – allowing a direct forum for anonymous grievances

b) **Handling Grievances fairly and promptly.**

JBS will follow its own procedure or fall back on the Acas (Advisory, Conciliation and Arbitration Service) [Code of Practice on disciplinary and grievance procedures | Acas](#) .

In essence, grievance situations in the workplace may be best managed as follows:

- 1) Let the employer know the facts of the grievance, promptly
- 2) Hold a meeting with the Employee to discuss the grievance
- 3) Allow the employee to be accompanied at the meeting
- 4) Decide on appropriate action

c) **Doing a due diligence audit of JBS's human rights impacts**

JBS HR does a HR audit annually - to see how effectively we uphold human rights and to address any gaps in JBS activities as they relate to human rights. JBS HR will audit the human rights activity each year and communicate the results to JBS Management. Such an audit is quantitative, specifically covering:

- Staff numbers
- Gender and pay balance
- Staff hours worked
- Number of reported incidents
- Lost Time Injury (LTI) severity & rate
- RIDDOR accidents
- Average hours Training per employee
- % of staff covered by healthcare
- Union representation availability %
- No. of Whistleblowing incidents
- No. of Equality, Diversity & Inclusion or Discrimination Incidents

This is followed up with a further Qualitative analysis and Suggestions as to how to remediate any shortcomings, to management.

In terms of implementing JBS Labour & Human Rights Policy, JBS Procurement commits to:

- 1) get each supply chain partner to sign their agreement with the JBS Human rights (and Sustainability) policies. These are specifically covered within the **JBS Supplier Ethical (ETI) Code of conduct Policy** which JBS suppliers must read, sign and return to JBS and commit to implementing.
- 2) check up on supply chain implementation of Human rights policy- by way of the annual **JBS Supplier Assessment Form**. This form is a detailed 30 point questionnaire which is given annually to every JBS supplier to complete, sign and return. It covers the ethical and environmental standards to which JBS suppliers are expected to adhere.

- 3) Require JBS Key Suppliers to complete **SEDEX SMETA 4 Pillar** independent assessments of their ethical and sustainable credentials, specifically covering their human rights compliance.

Approved and Signed by Grattan Boylan
JBS Chair
on behalf of the Board of JBS, May 2023

Related, relevant Documents:

[International Bill of Human Rights | OHCHR](#)

[What are the Ruggie Principles? \(activesustainability.com\)](#)

JBS Ethical (ETI) Code of conduct Policy

JBS Equality, Diversity and Inclusion (EDI) Policy

[DevelopHumanRightsPolicy_en.pdf \(ohchr.org\)](#)

JBS Gender Pay Gap Policy & Mitigation Procedures 2023

JBS Equality Diversity & Inclusion (EDI) Policy 2023

JBS Whistle Blower Policy 2023

JBS Anti-Harassment Policy

JBS Supplier Code of Conduct Policy

JBS Supplier Assessment Form

[SMETA Audit 2-pillar & 4-pillar - Eurofins](#)