

STATEMENT OF COMPLIANCE – HACCP Letter**January 4th 2024****1 APPROVALS AND CERTIFICATIONS**

INALER S.A., Establishment N° 55 is approved by the European Commission (Food and Veterinary Office) the US Food Safety and Inspection Service (FSIS – USDA) and others Market/Destination, to produce fresh and frozen beef and lamb, for exportation. We certify that our programs and operations comply with all applicable USDA-FSIS regulations European Union requirements and other markets requirements as well.

The Establishment is BRCGS (BRC Global Standard for Food Safety) Issue 9 certified, achieving Grade AA*, for the following activities: Stock reception process for slaughter, Slaughtering process, Offals, Maturation, Quartering, Deboning and Packing process of frozen or chilled, bovine meat, with or without bones vacuum packed or individually wrapped or bulk pack.

Establishment N° 55 is certified for organic beef production in accordance with the Organic Production Methods USDA NOP (7 CFR Part 205), E.U. (Regulation 834/2007, Regulation 889/2008) and Equivalence arrangement Organic U.S – Canada (USCOEA)

Inaler is committed to comply with national and international regulations on Animal Welfare. This commitment is established at corporate level through the Animal Welfare Policy approved by the Directory. Animal welfare practices are audited annually in accordance by NAMI requirements and certified by INAC's (National Meat Institute) Animal Welfare Protocol.

The establishment is also certified under Tacuarembó Angus Beef protocol since 2016 for production of frozen and chilled bovine meat with or without bones.

Since 28 of January of 1997, we complied with the Federal Register, Volume 61 N°144, July 25th 1996 FSIS that released the PR/HACCP System, Rules and Regulations. The Pathogen Reduction component mandated a program of bacteriological testing of bovine carcasses for the presence of *Escherichia coli* generic and *Salmonella* spp. bacteria, to verify the effectiveness of process controls for hygiene and sanitation under the plant's HACCP system.

2 HACCP AND PREREQUISITES PROGRAM

The HACCP Plan and the Prerequisites Program (GMP and SSOP) have been audited and approved by the Ministry of livestock and fisheries of Uruguay (MGAP) and by most of the external Official Sanitary Authorities: USDA-FSIS, E.U., Canada, Japan, México, Israel, Russia, Chile, China among others.

The Prerequisites Program includes:

- Documented pest control program designed to prevent pest activity within the plant and its surrounding area, by licensed Pest Control Operators.
- Implemented written training programs sufficient to ensure that HACCP plans, SSOPs, and prerequisites are properly executed.
- Documented maintenance practices programs including metal, glass and plastic policy.
- Documented employee hygiene and hygienic practices program
- Traceability system through DICOSE. Required by law to register with his division a DICOSE number, this went into effect since 1977. In 2004 a pilot program started for individual animal identification since birth to slaughter. Uruguay began in September of 2006 the individual identification. Mock recalls are conducted once a year to validate the traceability program.
- Animal Welfare documented program outlining animal handling in compliance with the Official Uruguayan Rules, USDA – FSIS Directives 6900.2, and CE Directive 1099/2009.

- Handling of the Specific Risk Material (SRM) documented Program in compliance with the Official Uruguayan Rules effective at the moment, in accordance with the current Federal Register Rules and Regulations (CFR) N° 310.22, and CE Regulations 999/2001, 1923/2006 and 728/2015

Uruguay is listed at the World Organization of animal Health (OIE) current Resolution, as having negligible Bovine Spongiform Encephalopathy (BSE) risk in accordance with Chapter 2.3.13 of The Terrestrial Code. The HACCP plan is in compliance with FSIS NOTICE 56-07 August 31st, 2007, of the SRM final rule.

As a part of the HACCP reassessment, the slaughter plant is in compliance with USDA – FSIS NOTICE 56-07 of the SRM final rule, about the proper removal, segregation, and disposal of Specified Risk materials.

The Company is following European Commission and USDA –FSIS prohibitions on SRM.

In Uruguay is in force the decree MGAP 139/996 (Ministry of Agriculture and Fisheries) since April 1996 which prohibits the feeding of ruminant meat and bone foods derived from ruminants.

The company has in place a fully documented Good Manufacturing Practices Manual, Sanitation Standard Operating Procedures and a Hazard Analysis and Critical Control Point System integrated into its quality assurance system:

- It complies with Uruguayan Ministry MGAP guidelines for meeting FSIS Pathogen Reduction / HACCP requirements.
- It has internal audits (GMP, SSOP, and HACCP) every year.
- Is audited by most of the customers.
- The HACCP plan is audited by MGAP supervisors on plant.

The Prerequisites Program and the HACCP Plan include the following measures aiming to reduce the contamination inside and on living animals, slaughterhouse, and the rest of the plant:

- Animals should arrive with minimum mud and faecal contamination. And avoid overcrowding to reduce the possibility of injury or unsanitary conditions.
- Livestock pens capacities are sufficient to hold a single day's kill.
- Washing of cattle to eliminate contamination on their hides, monitoring, verification, take corrective action if there is deviation (Good Manufacturing Practices and SSOP).
- Minimize contamination of carcass and the dressing (monitored and verified by QA technician)
- Steam intervention applied on hide.
- Good manufacturing practices and SSOP operations for all operatives on the slaughter line: 2 knives (and colour coded for risk tasks), monitored and verified by QA technician.
- Prior to evisceration, the rectum is secured with plastic protection and tied up to prevent contamination.
- Lactic acid application on hindquarters.
- Oesophagus is tied up with a ring to prevent contamination.
- Trim Rail (Critical Control Point 1 - CCP1): All visible contamination is removed by knife trimming as soon as possible after it occurs to prevent microbial attachment (monitored, verified, corrective actions if it is necessary) to comply with zero tolerance directive USDA, FSIS 6420.2 and Regulation (EC) No 853/2004 of the European Parliament.
- A steam vacuum intervention is applied (validated intervention).
- At the end of the slaughter process, a final carcass intervention of hot pressured water and lactic acid is done in cabinets.
- Measures to control the chilling process temperature of the carcasses before quartering (RPC1 – Risk Prevention Control) ensure the effective microbial growth reduction (temperature is recorded daily and verified by QA technician)
- Measures to control quarters chilling process temperature before entering deboning area (RCP2), temperature is recorded and verified by QA technician.
- 180° F (82°C) water knife/ equipment sanitizers are utilized.
- Positive airflow is utilized in the kill floor to prevent the contaminants circulation.
- Measures to control cuts chilling process temperature (RPC3), temperature is recorded and verified by QA technician.

- Prior to storage the final product is checked with metal detector.
- Measures to control offals chilling process temperature (RPC4), temperature is recorded and verified by QA technician.

Est. N°55 confirms that its HACCP Plan has been reassessed in accordance with Federal Register Notice 9 CFR and other guidelines and regulations.

Since June 1st 2012 Tacuarembó - Marfrig Group Uruguay confirms that its HACCP Plan has been reassessed according with the MGAP (Uruguayan Ministry of Livestock) Resolution of 1st June in reference to the new regulation of USDA / FSIS control programs for Non-O157 shiga toxin-producing *Escherichia coli* (Non O157 STEC).

3 CHEMICAL CONTROL AND ANTIBIOTIC RESIDUE PROGRAM

The Ministry of Livestock, Agriculture and Fisheries (MGAP) controls the Establishment, through the sampling according to the Drug & Environmental Contaminants Residues National Program (PNRB). This program is official, national and includes a monitoring sampling of veterinary drugs and environmental contaminants, in order to protect public health of consumers of meat and meat products, regarding the food safety. The PNRB works within the General Direction of Livestock Services (DGSG) directed and administrated by a commission of the Directors of the different divisions of DGSG and an executive coordinator.

This sampling is performed by official vets monthly and bimonthly depending on the analysis; the sampling number is directly related to the number of animals slaughtered the previous year, it also includes a follow-up sampling of the farms that had findings.

The full residue and pesticides monitoring list is available on the MGAP's web page in local language at the following link: <https://www.gub.uy/ministerio-ganaderia-agricultura-pesca/politicas-y-gestion/programas/programa-nacional-residuos-biologicos>

This program aligns to the CODEX ALIMENTARIUS recommendations, with regulations and directives of European Union, United States and all of our exporting markets such as Russia, China and Israel among others.

The maximum residue limits are the ones indicated by CODEX, after the scientific evaluations performed by JECFA.

4 GMO, ALLERGENS, AND IRRADIATED PRODUCT

The meat produced by the establishment only proceeds from animals that have not been genetically modified and have not been used genetically modified organisms, ingredients or components on their preparation.

The establishment does not produce or handle any product that contains allergens in accordance with several countries regulations such as United States (FSIS Directive 7230 Par 1), Canada (CFIA), U.E. and United Kingdom (Regulation EU No 1169/2011, CE Directive 2009/32), Mexico, Australia (Australia New Zealand Food Standards Code – Standard 1.2.3), China, Japan and Korea among others.

None of our products have been treated using ionizing radiation on any production step.

5 TRACEABILITY AND RECALL

The plant has a fully implemented traceability system at all stages of production and processing, identifying from whom raw materials (including primary packaging materials) have been obtained and to which customer finished product has been dispatched. The system ensures that all products are adequately labelled and identified to facilitate traceability.

This traceability process is as follows:

When animals arrive at slaughterhouse, they are assigned with a lot number (troop number) which associates the animals with their owner and place of origin.

In the slaughtering room each half carcass is identified with a card stamped in each quarter including slaughtering date, troop number, grading. This information goes with all quarters up to the entrance on the deboning room, where the labels are removed from the quarters and their information is used during the deboning process for cuts preparation and primary and secondary packaging.

The Establishment keeps all this information, as long as it considers relevant, to be in condition to answer any future question about origin of each cut.

The system is tested at least once per year to ensure that traceability can be determined back to the raw materials suppliers and forward to the recipient of the product from the plant.

The plant has a fully implemented recall program that guarantees that all actions that must be taken are effective to remove the product from the market. This program is tested at least annually through mocks to identify potential problems that may occur at a real recall and to determine its adequacy and efficacy.

6 FOOD DEFENSE PLAN

The Establishment has in place the appropriate security measures to prevent any intentional product adulteration or contamination. The security measures in plant include 24 hours access control at main and livestock entrances, fenced perimeter, lighting, and CCTV cameras system on internal and external areas.

All external personnel (suppliers, visits, services) and vehicles have to be authorized, identified and accompanied during their visit. A record of all visitors to the site, including name, company, date, time of entry and exit, as well as the purpose of the visit is kept. Access to production areas, laboratory and storage areas for supplies, raw material and finished products are restricted.

The security personnel and all plant staff are trained in security measures and to report security breakages.

The Food Defense Plan is verified minimum annually by the Food Defense Team.

7 CROSS SPECIES CONTAMINATION

Establishment No. 55 Inaler S.A, is approved for bovine and ovine slaughter by competent authority (MGAP), therefore the following measures are taken on the site to avoid cross contamination:

CONTROLS ON SITE

- Livestock pens capacities are enough to hold a single day's kill.
- Sheep and cattle slaughter is always done in different floors and different days.
- Deboning on different days.
- Validation of deboning cleaning process shows that there is no possibility of mixing species, after the cleaning process defined in SSOP's program.
- Third party laboratory DNA testing every six months as part of the Internal Verification Program.

OFFICIAL CONTROLS

There is a Verification Program in authorized establishments since 1991 arranged in Circular 9/2008 of the Technical Department of Animal Industry Division. Responsibilities, characteristics of the sample, sampling plan, analysis and records of results are set out in it. The samples are extracted and analyzed by official personnel in the official laboratory of the Ministry of Livestock, Agriculture and Fisheries, Veterinary Laboratories Division (MGAP / DILAVE). Since its implementation has not been detected any nonconformity.

Therefore, only Beef with no traces of any other non-beef protein or DNA is shipped and only lamb with no traces of any other non-lamb protein or DNA is shipped.

8 SOCIAL RESPONSIBILITY, HEALTH AND SECURITY AT WORK AND ENVIRONMENTAL PROTECTION

Our ethics policy is based in the compliance of the company Ethics Code requirements of social responsibility of our clients and international standards such ISO 26000, SA 8000 among other. We assure in our activities, as well as the partners, the compliance with the most rigorous standards of ethical conduct, taking into account the laws and regulations and social context of the case. We act according to law and regulations with responsibility, integrity and professionalism.

To preserve the health and physical integrity of our employees is a priority of the company. The company is committed to preserve the health and physical integrity of its employee as stated on the corporate Security and Health at Work policy. We provide all individual elements of protection necessary for each work, training and necessary orientation for the correct usage and perform campaigns for preventing work accidents.

The plant is SEDEX member (ZC1063609 ZS408075881).

We have taken all applicable and recommended measures for our industry to prevent coronavirus infections of our workers and keep a continuous improvement on this issue, to protect our workers and keep the food supply to the world.

In the develop of our current and future activities, we always use technologies and resources to reduce the impact on nature and people in order to contribute to preserve the environment for future generations.

9 PATHOGEN REDUCTION PROGRAM

The company has a Pathogen Reduction Program in the different production steps (slaughter and processing) to verify the efficacies of these measures and the HACCP systems.

The Pathogen Reduction Programs includes:

- Analytical testing and/or auditing of the monitoring procedures.
- Calibration of the equipment.
- Product sampling.
- Review of monitoring records.
- Review of deviations and product dispositions.
- Sampling of environment and other concerns.
- Internal audits (GMP, SSOP, HACCP, Quality system) minimum once a year.

The analyses are:

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| • E.coli generic | • Salmonella |
| • Coliforms | • Staphylococcus aureus. |
| • Aerobic total count | • E.coli O157:H7 / NM and Non O157 STEC |
| • Enterobacteriaceae | • Listeria sp. (environmental sampling). |

We comply with the Regulation (CE) N° 2073/2005 and all its modifications, of European Commission of November 15th 2005 on microbiological criteria for foodstuffs.

The methodology of analysis are validated by AOAC and AFNOR .

The analysis of E.coli O157:H7/ NM and Non O157 STEC is performed at the Plant's Laboratory which is approved by the Country Official authorities, the Ministry of livestock of Uruguay (MGAP).

Since Jan 2008, considering the sampling method required officially by USA and Canada (N=60 for each lot), tests have made for E. coli O157:H7 according with it.

We comply with FSIS Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga Toxin-Producing Escherichia coli (STEC) Organisms or Virulence Markers (August 2014).

In addition, we guarantee in this statement / declaration that the "HACCP plan and prerequisite programs meet the requirement for product intended to export to Canada according with the CFIA requirements. The Certificates of analysis for Canada are the result of E. coli O157:H7 and specify separately the results for the NM (non-motile) bacteria. The certificate declare not detected E.coli O157:H7 and E.coli O157: NM.

The laboratory conducting the test is formally recognized by an accreditation body that is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Agreement (MRA) as conforming to the requirements of ISO/IEC 17025:2005.

The following method or equivalent is acceptable: The Lot size meet CFIA's definition of lot (maximum 4500 kg per lot) as defined in the Sampling and Testing chapter of CFIA's Preventive controls for E. coli O157/NM in raw beef products.

The product to Canada is released only if this pathogen is not detected in the lot.

We use Real time PCR (Biomérieux®) for screening of O157:H7 and Non O157 STEC, the presumptive samples are sent to external laboratory for confirmation.

Only product that is compliant with HACCP requirements and tested "negative" for Escherichia coli O157:H7 and Non O157 STEC is shipped.

Only product that complies with HACCP requirements and test result was absence for E. coli O157:H7 and absence for STEC is shipped for USDA and not detected E.coli O157:H7 and E.coli O157: NM for Canada.

Company Objectives and Management:

San José Industrial Plant - INALER S.A, Establishment N° 55, is committed to implement and maintain, compliance with the HACCP Plan, Good manufacturing Practices, Standard Operating procedures, quality policies (quality control assurance) in order to improve the safety and quality of the product.

Yours faithfully,

Karin Muszwic, Chem.
Quality Manager, Establishment N° 55
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