

Food Safety Letter

Dear GURRENTZ INTERNATIONAL:

JBS S/A - Brazil would like to inform you and your company of the Food Safety and Regulatory Programs, and other significant Programs which we have implemented at each of our beef harvest and/or processing locations noted below:

Establishment number	Location (City/Location)
SIF 49	Nova Andradina/Mato Grosso do Sul
SIF 175	São Miguel do Guaporé/ Rondônia
SIF 385	Andradina/São Paulo
SIF 504	Ituiutaba/Minas Gerais
SIF 615	Anastácio/ Mato Grosso do Sul
SIF 862	Goiânia/ Goiás
SIF 1662	Campo Grande/ Mato Grosso do Sul
SIF 2058	Senador Canedo/Goiás
SIF 3181	Naviraí/Mato Grosso do Sul
SIF 3470	Confresa/ Mato Grosso
SIF 4333	Vilhena/Rondônia
SIF 4400	Campo Grande/ Mato Grosso do Sul
SIF 4507	Mozarlândia/ Goiás

The company is committed to the safety and quality of our products reason why all JBS beef harvest and process facilities are in compliance with all Brazilian and target market regulations, including the United States Department of Agriculture – USDA applicable regulations. The programs outlined below have been implemented in order to comply with these requirements.

Food safety program summary

JBS S/A is committed to the safety and quality of our products. All of JBS facilities have implemented a fully documented Hazard Analysis and Critical Control Points (HACCP) Plan, including a scientific and systematic approach to the control of productive processes, with the principle of eliminating, minimizing and controlling the possible risks to public health. Occasionally, due either to changes in the regulations, plant procedures, or nationwide information that may affect the hazard analysis or alter the critical control point, the adequacy of the HACCP Plan is reassessed. At a minimum, each facility re-assesses their respective HACCP plan annually. Our HACCP plan complies with FSIS Pathogen Reduction (PR) requirements. The PR component mandated a program of bacteriological testing of bovine carcasses for the presence of Generic *Escherichia coli* and *Salmonella* spp. bacteria to verify the effectiveness of process controls for hygiene and sanitation under the plant's HACCP program.



Others Prerequisites Food Safety and Quality Assurance (FSQA) Programs are implemented in conjunction with HACCP:

- ✓ Sanitation Standard Operating Procedures (SSOPs)
- ✓ Good Manufacturing Practices (GMPs): Instrument Calibration, Temperature Control, Pest Control Program, Maintenance of Facilities and Equipment, Receipt of Inputs and other practices
- ✓ Control of Foreign Bodies
- ✓ Allergen Control Program
- ✓ Microbiological/Chemical/Physical Testing Program on carcasses, beef products
- ✓ Recall and traceability
- √ Food Defense Program
- ✓ Food Fraud Program
- ✓ Animal Welfare Policy

JBS facilities are under supervision of permanently Brazilian Federal Inspection Service (SIF), from the Ministry of Agriculture and Supply (MAPA). Federal Veterinary Inspectors are designated to perform ante and postmortem inspections and as well as supervision over production process including storage, loading and transport.

The factories of this letter are certified annually to the Global Food Safety Initiative (GFSI) standards under BRC Certification.

In addition, all harvest facilities perform extensive microbiological tests on carcasses and other beef products that serve as verification that the intervention system is functioning as designed. Moreover, all facilities also conduct routine environmental sampling for product contact pre-operational cleanliness at a variety of points in the production system. Monitoring results are evaluated on an ongoing basis for trend analysis of the facility and products.

Lot definition

Produced lot represents the production date (according to the applicability of the deboning production lot) in the production shift and consists of the following characteristics:

- **a)** It is identified by a sequence of letters and/or numbers for a production date of up to 4,763.5 kg (10,500 pounds) of the same product code, for the same production date (deboning date);
- **b)** It is produced in the same processing unit, without flow interruptions, stoppages or other changes that may cause one part of the lot to differ significantly from another;
 - c) It is constituted in such a way as to include rework;
 - d) It is accessible for inspection and testing;
 - e) It is traceable from origin to distribution;
 - f) Must consist only of products intended for export to the United States.

Labeling regulation

The labels on products exported to the United States of America are in compliance with 9 CFR.317.2, and these products are eligible for generic approval as defined in 9 CFR 412.2(b).

Interventions



Our Food Safety Processes follow good sanitary dressing practices during harvest and fabrication which include washing cattle with hyperchlorinated water prior the slaughter, perianal cattle washing with hyperchlorinated water, properly implemented and verified sanitary dressing procedures, standard procedures for the hygienic handling of carcasses, knife trimming carcasses, washing on the final step and proper cold chain management system. The validated interventions used as part of the food safety system to control pathogens are carcass steam-vacuuming, and zero tolerance standard for visible fecal material, ingesta, or milk on carcasses at the time of inspection (CCP).

Supplier Approval Programs

JBS S/A has prerequisite programs as a foundation enabling our HACCP systems to function more effectively. Since our facilities do not continuously monitor the manufacturing processes of all materials received into the facilities, we rely on programs such as our Supplier Programs to help mitigate possible biological, chemical and physical hazards. The Supplier Programs provide the mechanisms by which we ensure supplier compliance with our Food Safety/Quality and specifications requirements.

Escherichia coli 0157:H7 Controls and Testing including non 0157 STEC

As a part of our continuing food safety effort, the company has a testing plan for Shiga Toxin-Producing *Escherichia coli* – STEC (*E.coli* O157:H7 and six non-O157 serogroups: O26, O45, O103, O111, O121 and O145) and *Salmonella* implemented in establishments certified to export meat (trimmings and intact beef products intended for non-intact use) to United States of America, with the purpose of monitoring the production process regarding public health risk and applications of Quality Assurance tools. It also has a collection procedure described to meet the requirements, ensuring that all established guidelines are strictly followed. JBS S/A would like to outline certain key aspects of its *E. coli* verification-testing program:

- ✓ 100% of lots of the products (trimmings and and intact beef products intended for non-intact use) are sampled.
- ✓ The company adopts a sampling plan that serves as a continuous check of microbiological safety systems and processes in food producing establishments. N60 sampling plan: 5 boxes from each lot are sampled to make up the 60 pieces. The first and last boxes of each lot are necessarily to be sampled. The other boxes for sample composition are collected at random.
- ✓ The traceability of the samples is maintained in case of any positive result or multiple positive results.
- ✓ Establishments have procedures in place to hold or control the product that is represented by the test result to prevent adulterated product from entering commerce. The entire lot produced is kept blocked, in an easily traceable and identifiable way, until the results are released.
- ✓ When the test results are acceptable (negative test result on a sampled lot for the presence of all *E. coli* STEC), the products (lots) will be released.
- ✓ The products that are positive or presumptive positive (not confirmed negative) for STEC are adulterated.

High event period



The company also implemented the High event periods (HEP), in which the criteria were established according to the "FSIS Compliance Guideline for Establishments Sampling Beef Trimmings for Shiga Toxin-Producing Escherichia coli (STEC) Organisms or Virulence Markers, 2014". It is important to note that, for the purpose of determining HEP, positive results are considered both those potentially positive after the Screening Test, as well as those confirmed in subsequent steps in accredited laboratories by MAPA (Ministry of Agriculture, Livestock, and Supply).

Residue Testing

The JBS group has implemented in its plants an Internal Program of Chemical Residues Control covering analysis with variable frequency in relation to the risk (established in the risk analysis document for Chemical Contaminants in Cattle) or in compliance with specific legislation. In addition to the internal control program, all plants are submitted to the National Program of Residues and Contaminants Control (PNCRC) of the Ministry of Agriculture, Livestock and Supply (MAPA). Any sampled carcasses are retained until sample results are returned and found to be negative. The facilities have implemented acknowledgement forms that producers sign to ensure understanding and compliance with the requirements for animals to be suitable for human consumption at the time of harvest.

Ruminant feed ban 21 CFR 589.2000

JBS S/A also clarifies that according to the Brazilian Regulation "Instrução Normativa nº 8/2004" it is prohibited, throughout the national territory, the production, marketing and use of products intended for the feeding of ruminants containing proteins and fats of animal origin (including meat and bone meal, and fat from animals). In this way, all bovines sent for slaughter are accompanied by the Producer Declaration, that is a mandatory supporting document, in which the farmer ensures that the animals were not fed with foods containing animal protein (meat flour, bones, blood and mammalian fat), with the exception of milk proteins and fats. It is in accordance with Code of Federal Regulations - Title 21 - PART 589 - Sec. 589.2000: Animal proteins prohibited in ruminant feed.

Control of Specified Risk Materials

Operations at our facilities are governed by applicable regulations, including all additions pertaining to the exclusion of "Specified Risk Materials (SRMs)" from the human food supply. All of JBS plants have implemented Specified Risk Materials (SRM) Program, which defines local procedures for segregation, weighing, disposal or incineration of SRM, identification and cleaning of equipment and utensils and monitoring/verification records. In order to better serve the SRM program all animals are inspected regardless of age. Therefore we declare that all efforts are taken to prevent BSE cross contamination during the slaughter process.

Furthermore, the traceability system that is implemented allows to trace through codes and identifiers what is generated along process - from the lots of animals slaughtered and raw material used to the final products expedition.

In case of suspicious animal (with clinical signs of disease in the central nervous system) the Federal Inspection Service allocated in slaughterhouses are required to send a sample to official laboratory. Additionally ante mortem inspection is done with this focus as part of routine (National Surveillance System for the Transmissible Spongiform Encephalopathies).

The chilled/frozen beef supplied do not contain the following risk material: skull, brain, trigeminal ganglia, eyes, spinal cord, dorsal root ganglia, vertebral column (excluding the vertebrae of the tail, the transverse processes of the thoracic and lumbar vertebrae, and the wings of the sacrum), tonsils and the distal ileum of the small intestine (portion from the ileo-cecal junction - minimum of 203,2 cm / 80 inches of the attached and uncoiled small to the ileo-cecal junction) from bovine animals of all ages. No air injection stunning is used.

In addition, JBS would like to emphasize that in accordance with Chapter 11.5 of the OMSA Terrestrial Animal



Health Code, Brazil is officially recognized as having a negligible bovine spongiform encephalopathy (BSE) risk status.

Humane handling

JBS S/A is committed to meeting all applicable regulations that pertain to animal handling and the proper care of animals. All processing units have an Animal Welfare Program implemented in accordance with national and international recommendations such as the World Society for the Protection of Animals. The company works towards to ensure a good degree of animal welfare which means an animal that is safe, healthy, comfortable, well nourished, free to express natural behaviors and without suffering from negative mental states such as pain, frustration and stress.

The following information is provided to demonstrate our commitment to Animal Welfare:

- ✓ JBS has an animal welfare department as part of its quality assurance area to ensure animal welfare, treined by an independent 3rd party.
- ✓ Sites are 3rd party certified under PAACO protocol once a year.
- ✓ Each of our JBS operational units has a representative of the animal welfare team guiding and training the personnel involved with practices related to animal welfare.
- ✓ Training programs in place specifically designed to address animal handling issues.
- ✓ Industry experts have been used to design equipment and review the animal handling and slaughter process.
- ✓ Our plants offer suitable facilities that fully comply with animal welfare standards, as well as legal and trade requirements. We have the best equipment available on the market to ensure maximum efficiency and a high degree of animal welfare and quality, the plants are equipped with well designed stunning and handling equipment which is kept well maintained by trained, conscientious employees.
- ✓ Completes internal daily monitoring records to ensure animal handling requirements are continuously met.
- ✓ Supply Chain Protocol ("Selo da Cadeia de Fornecimento") in all facilities, that is a certification of private protocol, validated by a third party, considering strict protocols on topics such as animal welfare, traceability, sustainability, operation, production, quality, industrialization and commercialization.

JBS S/A continuously strive for excellence in providing our customers with a high-quality and safe product manufactured under strict food safety standards.

Should you require any further information, please feel free to contact us.

Sincerely,

Maria Emília Santoro Raucci Saleme Quality Assurance Director – JBS S/A

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