

**STATEMENT OF COMPLIANCE (HACCP-PREREQUISITE LETTER) FRIGORÍFICO TACUAREMBÓ S.A. EST. N°12****COMPANY OBJECTIVES AND MANAGEMENT:**

Frigorífico Tacuarembó S.A. Establishment N° 12 is committed to implement and maintain compliance with the HACCP System, Good Manufacturing Practices, Standard Operating procedures and Quality control assurance policies in order to assure safety and quality of the products.

**1 APPROVALS AND CERTIFICATIONS**

The plant Frigorífico Tacuarembó S.A., Establishment N° 12 is approved by the European Commission (Food and Veterinary Office), the US Food Safety and Inspection Service (FSIS –USDA), CFIA (Canadian food Inspection Agency) and other Market/Destinations to produce and export fresh and frozen beef, processing and packaging of thermo-processed and intermediate moisture beef products. We certify that our operations comply with all applicable regulations.

Establishment N° 12 is BRC Global Standard for Food Safety Issue 9 certified, achieving Grade AA+, for the following activities: Slaughtering, maturation, cutting, deboning, and packaging of chilled or frozen bovine meat vacuum or polyethylene packed. Slicing, tumbling with ingredients, thermal processing, packaging or ready to eat cured or not cured and dried cooked beef. Tumbling with ingredient, marinating or not, stuffing or not, drying of ready to eat dried beef cuts polyethylene packed. Mincing or not, injection or not, tumbling or not and addition of ingredients or not of frozen or chilled cooked beef cut, offal or ground meat polyethylene packed. Mincing, mixing, forming, freezing with or without breading and packaging of frozen beef burgers, meat balls or ground beef packed in flow pack or polyethylene packed. Injection, tumbling, freezing, slicing, packaging of frozen beef cuts polyethylene packed. Dressing, chilling, packaging of bovine offal, chilled or frozen polyethylene packed. Mincing, thermal processing, centrifugate and packaging of edible beef fat in flow pack, polyethylene and/or bulk.

Establishment N° 12 is certified for organic beef production in accordance with the Organic Production Methods USDA NOP (7 CFR Part 205) and E.U. (Regulation 834/2007, Regulation 889/2008).

Frigorífico Tacuarembó 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.

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 January 1997 we comply with the Federal Register, Volume 61, N°144. On July 1996 FSIS released the PR/HACCP Rule. The Pathogen Reduction 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 system.

**2 HACCP AND PREREQUISITES PROGRAM**

HACCP plan and prerequisite programs (SSOP and GMP) has been audited and approved by MGAP (Ministry of Livestock, Agriculture and Fisheries of Uruguay) and by internal and external annual audits, customers and external Official Sanitary Authorities including: USDA, European Union, Mexico, Canada, Korea, Chile, Russia, China, Japan and others, with satisfactory results.

The company verifies the HACCP System by:

- Review of records and procedures.
- Environmental and product sampling.
- Review of deviations, corrective actions and product dispositions.
- Periodical Internal and external audits.

The Company has in place a fully documented Good Manufacturing Practices- SPS (Sanitation performance standards), Sanitation Standard Operating Procedures (SSOP) SSOP's and Hazard Analysis Critical Control Point (HACCP) integrated of our quality assurance system; in compliance with MGAP guidelines for meeting FSIS Pathogen Reduction/HACCP requirements.

The prerequisites include among others:

- Documented pest control program designed to prevent pest activity within the plant and its surrounding area, by Licensed Pest Control Operator.
- Training programs enough to ensure that HACCP plans and prerequisites are properly executed.
- Documented maintenance practices programs including metal, glass and plastic policy.
- Documented employee hygiene practices program.
- Traceability system required by law since 1977. Individual cattle identification since birth to slaughter since September 2006. Full traceability system implemented in the establishment at all production stages and mocks are conducted once a year to validate the traceability program.
- Recall program fully implemented and mock recall are conducted.
- Animal welfare protocol and program outlining animal handling in compliance with MGAP guidelines, USDA – FSIS Directives 6900.2, 16-08 and 17-08 and CE Directive EU 1099/2009.
- Handling of Specific Risk Material (SRM) in compliance with Official Uruguayan Rules, in accordance with the Federal Register Rules and Regulations (CFR) N° 310.22 and CE Regulations 999/2001, 1923/2006 and 728/2015.
- Environmental and water treatment sampling program.

Uruguay is listed at the World Organization of Animal Health (OIE) current Resolution as having negligible risk of Bovine Spongiform Encephalopathy (BSE) in accordance with Chapter 2.3.13 of the Terrestrial Code. Therefore, the HACCP plan complies with FSIS NOTICE 31st, 2007, of SRM final rule. In Uruguay is in force the decree MGAP 139/996 since April 1996, which prohibit feeding of ruminant with byproducts derivate from animals.

The Establishment complies with the national official Drug & Environmental Contaminants Residues National Program (PNRB) of MGAP. This program includes a monitoring sampling of veterinary drugs and environmental contaminants, in order to protect public health of consumers of meat and meat products, regarding food safety. This program is aligned to the CODEX ALIMENTARIUS recommendations, to regulations and directives from European Union, United States, Canada and all of our exporting markets such as Russia and China among others.

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.

### 3 PATHOGEN REDUCTION PROGRAM

The company has a Pathogen Reduction Program in the different production steps to verify the efficacy of the measures and HACCP systems.

Regarding E. coli O157:H7, establishment N° 12 confirms that its HACCP Plan has been reassessed in accordance with Federal Register Notice 9 CFR Part 417 (Docket N° 00-022N) 7 October 2002 Titled E. coli O157:H7 and according with Notice 65-07 October 2007 for raw ground beef manufacturing trimming: USDA. The HACCP team of the company consider E. coli O157: H7 is a hazard reasonably likely to occur in its products without the implementation of a HACCP Plan.

The methodology implemented for pathogen analysis is real time PCR equipment, GeneUp Biomerieux brand; AOAC Performance tested 121806 (STEC) and AOAC Performance tested 121805 (E.coli O157). The in-house laboratory is approved by MGAP according with ISO/IEC 17025:2017.

We guarantee 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 17025:2017. The Lot size meet CFIA's definition of lot (maximum 4500 kg per lot) as per CFIA document: Preventive controls for E. coli O157/NM in raw beef products.

In relation to Shiga toxin-producing Escherichia coli (STEC) O26, O45, O103, O111, O121 and O145, Establishment N° 12 confirms that its HACCP plan has been reassessed in accordance with Federal Register Vol.76 N°226, of 23 of November of 2011 and according with the MGAP regulation 3/2012 of April 2; 2012. We comply with MGAP/DGSG/DIA/N°233/014. The HACCP team of the company considers STEC is a hazard reasonably likely to occur in its products for grinding without the implementation of the HACCP plan. STEC auto control analysis are performed

by internal laboratory and official samples are sent to official external laboratory that uses the methodology BAX PCR –real time bases in USDA MLG for the detection of Shiga toxin- producing Escherichia coli (non O157) and STEC.

Environmental sampling plan is implemented for Listeria sp. using AOAC and AFNOR approved analysis.

The pathogen reduction program includes the following measures (according with FSIS Directive 6410.1 Verifying Sanitary Dressing and process control procedures in slaughter operations of cattle of any age):

- Animals should arrive with minimum mud and fecal contamination and avoid overcrowding to reduce the possibility of injury or unsanitary conditions.
- Livestock pens capacity is enough to hold a single day of kill.
- Washing cattle to eliminate contamination on their hides, monitoring, verification, take corrective action if there is deviation (Good manufacturing Practice and SSOP).
- Steam intervention on hides.
- Good manufacturing practice and SSOP operations for hide removal (with two knives of different colors) monitored and verified by quality assurance personnel.
- Lactic acid application on hind quarters area.
- Prior to evisceration, the rectum and esophagus are secured to prevent contamination.
- All visible contamination is removed with knife trimming, as soon as possible after it occurs to prevent microbial attachment.
- Carcass intervention knife trimming CCP1 (monitored, verified, corrective measure and action if necessary) to comply with zero tolerance directive USDA, FSIS 6420.2 and Regulation (EC) No 853/2004 of the European Parliament.
- Intervention with validated steam vacuum equipment and process on hind and fore quarters.
- Intervention with cabin by application of hot water.
- Intervention with cabin by application of lactic acid.
- Carcass temperature control after chilling RCP.
- 82° C water knife/utensils sterilizers are used.
- Positive airflow used in the kill floor to prevent circulation of airborne contaminants.
- As a part of the HACCP reassessment, the slaughter process 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.

Microbiological testing is also used to verify the effectiveness of interventions and process controls at processing:

Year	Nº samples (cases)	Nº negative tests	Nº positive tests E.coli O157:H7
2008	-	6100	0
2009	-	7360	0
2010	-	10080	0
2011	-	5928	0
2012	-	6500	0
2013	-	3800	0
2014	-	5609	0
2015	20336	6932	1
2016	14382	6474	0
2017	14629	7189	0
2018	10679	6191	0
2019	10549	5857	4
2020	14742	8470	1
2021	12356	6914	2
2022	27467	9982	1
2023	29588	10908	1
2024	48387	17224	3

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

Since June 1st, 2012, HACCP Plans have been reassessed according with the MGAP resolution on June 1st in reference to the regulation of USDA/FSIS Control Programs for Non-O157 shiga toxin-producing Escherichia coli (Non O157 STEC).

Year	Nº samples (cases)	Nº negative tests	Nº positive tests Non O157 STEC
2012	-	29	0
2013	-	39	0
2014	-	43	0
2015	8095	1619	2
2016	8465	1693	2
2017	11050	2210	0
2018	5331	1812	2
2019	4540	908	3
2020	6310	2974	4
2021	7702	3459	3
2022	17168	5323	1
2023	13305	5333	1
2024	33951	10027	0

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

#### 4 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 must 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.

#### 5 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, considering the laws and regulations and social context of the case. We act according to law and regulations with responsibility, integrity and professionalism.

The company is committed to preserve health and physical integrity of its employees 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 (ZC 1046107 / ZSZS1046847) and the SMETA Certification is planned for this year.

We have taken all applicable and recommended measures for our industry to prevent coronavirus infections of our workers and keep a continuous improvement system 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.

#### 6 CROSS SPECIES CONTAMINATION

Frigorífico Tacuarembó S.A. Establishment No. 12, is approved for bovine 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.
- Third party laboratory DNA testing every six months as part of the Internal Verification Program.
- Annually we receive external audit from the client to verify this requirement.

#### 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.

### 7 CHEMICAL AND ANTIBIOTIC RESIDUE CONTROL PROGRAM

Frigorífico Tacuarembó S.A. Establishment No. 12 is controlled by the Ministry of Livestock, Agriculture, and Fisheries (MGAP), through sampling according to the Drug & Environmental Contaminants Residues National Program (PNRB). This program is official and nationwide. It includes a monitoring sampling of veterinary drugs and environmental contaminants, to protect the public health of consumers of meat and meat products.

The PNRB works within the General Direction of Livestock Services (DGSG) of MGAP.

This sampling is performed 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 sampling of the farms that had findings.

The full residue and pesticides monitoring list can be consulted on the web page at the following link: <https://www.gub.uy/ministerio-ganaderia-agricultura-pesca/>

This program is aligned to the CODEX ALIMENTARIUS recommendations, and with regulations and directives of the European Union, United States, Russia, China, Israel, and all of our exporting markets.

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

Local legal regulations:

- The PNRB was covered by the Presidential Decree 360/003, due to its importance and responsibilities in 2003.
- Official Rules of Veterinary Inspection of Products of Animal Origin.
- Decree 369/983, 7th October 1983. Official regulation for animal origin products veterinary inspection.
- Decree 915/988, 28th December 1988. That forbids the use of veterinary medicine that is used for growth promotion or fattening in bovine and ovine species.
- Resolution of the General Directorate of Veterinary Services, 27th November 1986, (Chloramphenicol prohibition).
- Decree 98/011 forbids the use of feed for animals of bovine and ovine species that contain antibiotics with the purpose of promoting growth.

### 8 GMO, ALLERGENS, IRRADIATED PRODUCT AND ANIMALS NOT CLONED

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 product boneless beef and by products produced by Frigorífico Tacuarembó S.A. (Est. N° 12) does not contain any allergen according to Directive 2003/89/CE and FDA - Food Allergen Labeling and Consumer Protection Act of 2004 (Public Law 108-282, Title II), and there is no possibility of allergen cross contamination on these products.

The allergens in Frigorífico Tacuarembó S.A. are used exclusively as ingredients for Hamburgers and Beef Jerky products.

The Hamburger plant and the Beef Jerky plant are independent plants with no flow or physical contact with slaughter and deboning plant.

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

All the animals slaughtered at Marfrig Group in Uruguay become from animals that are not cloned.

## 9 TRACEABILITY AND RECALL

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In the farm, cattle is loaded on trucks to be transported to the plant. The animals arrive to the slaughtering plant with the following traceability documentation:

- Guide of property and transit of the cattle, authorized by local police department. It states the owner and farm identification numbers from DICOSE (Animals Control Division of Ministry of Livestock), address of origin farm and place of arrival (slaughtering plant), date of transport, travel itinerary, information about truck and driver, number and category of animals.

- Statement of property and transit of animals registered on SIRA (Animal Register and Identification System).

- Certificate of sanitation and disinfection of trucks.

When animals arrive at slaughterhouse the documentation is reviewed by official veterinary inspection of MGAP (Ministry of Livestock, Agriculture and Fisheries). If the documentation is correct, a correlative lot number is assigned (herd number), which is associated to the owner and farm where it came from. This lot number continues until deboning.

There is a slaughtering program which indicates herd number, category, and quantity of animals to be slaughtered every day. In the slaughtering plant each carcass is identified with a label in each quarter indicating slaughtering date, herd number, correlative animal number and grading. Before entering the deboning room, this information is electronically read to get all the original slaughtering data into the system for deboning.

The final product is primary and secondary packaged on carton boxes which are identified with a label containing the following information: product information, net and gross weight, slaughter and production date, plant information, herd number if applies, and all other information required by country of origin, destination, or client. Inner label is placed on product before primary packaging if applies.

The plant keeps all this information for product traceability.

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.

Yours faithfully,

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Q.F Carlín Levratto  
Quality Control Chief  
Frigorífico Tacuarembó S.A.  
Establishment N° 12 Uruguay