



JBS N.V.
Stroombaan 16, 5th floor
1181 VX Amstelveen
The Netherlands

To: Rubicon Impact & Litigation B.V.
Attn: F. Peters
P.O. Box 15984
1001 NL Amsterdam
The Netherlands
Email: Peters@rubiconlitigation.com

Date: 21 May 2026

Re: Response to your letter dated 30 April 2026

Dear Mr Peters,

We received the letter dated 30 April 2026 that you sent on behalf of Stichting Greenpeace Nederland ("**Greenpeace**").

Your letter states that Greenpeace wishes to challenge JBS' business model. Greenpeace also demands that JBS halts any expansions of the group, specifically in Nigeria. Your letter then makes information requests on a variety of topics for a significant amount of data. JBS is a global meat processing corporation. In doing so, JBS complies with laws and regulations and believes it is well positioned to support food security in markets around the world. Your letter ignores both the pressing need for food security and the aim for food independence in local markets around the globe, as well as geopolitical dynamics at play. Your letter assumes that an NGO can weigh in on corporate decision making, has specific rights in relation to the strategy of a company, and can, through courts in Europe, interfere in policy decisions of sovereign states such as Nigeria. In summary, Greenpeace believes it can dictate policies and behaviour around the globe. It cannot.

Despite its length and the variety of topics raised, your letter does not contain a coherent position on which we can respond. To start, your letter counts 37 pages and coins the term 'duty of care' no less than 55 times. However, at no point does it specify the concrete legal obligations that JBS would have, to whom such obligations would be owed, or how JBS would be acting in breach of such purported obligations. Instead, you seem to believe that the existence of 'a' duty of care in itself provides a sufficiently concrete legal obligation for JBS to support Greenpeace's information requests. That approach finds no support in law. Put differently: there will be no discussion between JBS and Greenpeace that 'a' general duty of care under Dutch law exists.

It is unclear from your letter why the information you request in your letter would be relevant and needed to assess Greenpeace's legal position as asserted vis-à-vis JBS. JBS-specific

information appears irrelevant. After all, your letter states that Greenpeace wishes to "*challenge [JBS's] business model*" and demands that JBS "*cease any and all expansion of its group through new capital investments*", and you assert various purported company-agnostic obligations in the context of emission reduction, deforestation, biodiversity and vulnerable groups under the overall umbrella of human rights. If Greenpeace considers the business model or operations of an international meat processing business as inherently unlawful, or argues legal duties that for instance forbid a company to make capital investments, it should put such questions before a competent court. The question whether JBS is under a specific legal obligation in this respect, does not depend on JBS's internal documents, nor are such documents needed to substantiate that position. The fact that your letter does not link any of the requested information to any obligations or heads of claim confirms as much.

What remains is an obvious attempt to obtain a significant amount of JBS-data to trawl through, in the hope of finding something that might be used against the company. The Dutch legislator is clear about such practices and considers them: "*abusing the disclosure regime by fishing for information to which no right exists. For example, because a clear connection between the requested information and a concrete claim is lacking, or because information is sought of which the requesting party does not know whether it actually exists, and the information appears to be requested more to look for irregularities than to substantiate a case.*"¹

JBS regrets the escalation path Greenpeace has elected to pursue. Climate change and food security are defining challenges of our time. JBS has elected to publicly report on its sustainability progress and will continue to develop its policies and strategies.² It is regrettable that Greenpeace believes a courts' time and resources should be consumed on these matters. Polarisation will only hamper the cooperation that is needed to navigate the intricacies, nuances and complexities at play.

JBS's rights are reserved; none are waived.

Kind regards,

Daniel Pitta
General Counsel



¹ House of Representatives 2019-2020, 35 498, no. 3 (Explanatory Memorandum), p. 14. In Dutch: "*het misbruik maken van de regeling van het inzagerecht door te vissen naar informatie waarop geen recht bestaat. Bijvoorbeeld omdat een duidelijk verband tussen de verlangde informatie en een concrete vordering ontbreekt of omdat naar informatie wordt gezocht waarvan de verzoeker niet weet of die ook echt bestaat en de informatie meer lijkt te worden opgevraagd om een zaak op te zetten dan om deze te kunnen onderbouwen.*"

² See for instance <https://jbsglobal.com/sustainability/>, <https://jbsesg.com/> and JBS Sustainability Report 2024.