

Antibiotics Use Policy

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1. Introduction

About our Company

Boni Holding is Bulgaria's largest pork producer and a key player in the food industry, supplying 30% of the country's fresh pork. The company primarily focuses on pig breeding and meat processing, complemented by its feed production operations, which support its breeding activities.

We operate seven pig farms for raising our livestock and have three feed production facilities dedicated to our animals. Our main meat processing center is situated in Lovech, featuring an industrial cutting house, a factory for production of salami and delicacies, and a factory for production of meat preparations (meat cuts, minced meats, raw sausages and semi-manufactured products; ready to eat/cook products). The close proximity of these three enterprises creates a highly efficient production complex.

Additionally, we have a unique facility for raw-cured products in Karlovo, known for its specialized microenvironment that imparts a distinctive flavor to our offerings. In 2021, we enhanced our business model by launching Bulgaria's most technologically advanced pig slaughterhouse in Targovishte, which plays a vital role in ensuring the high quality of our livestock throughout the meat processing chain.

Through our feed mills, pig farms, and meat production facilities, we ensure that our products meet the highest quality standards while contributing positively to the Bulgarian economy and society. Our mission is to provide Bulgarians with responsibly produced meat, ensuring care for people, animals, and the environment. To achieve this, we have set four strategic goals to shape the Company's development in the coming years and beyond:

- Increase of the share of Bulgarian-produced pork in the overall consumption of Bulgarians (currently, two-thirds of the pork consumed comes from Europe).
- Strengthening our leadership position and becoming the leading innovators in the meat production industry.
- Meeting the needs of our customers by leveraging our scale and ability to control more stages of production.
- Maintaining the image of meat as an essential food and directing efforts towards promoting its importance.

2. Purpose of the Policy

The primary aim of the Antibiotics Use Policy is to ensure the responsible use of antibiotics in meat production, thereby safeguarding animal health, public health, and environmental integrity. This policy seeks to:

- Promote animal welfare ensuring that antibiotics are used judiciously to treat sick animals, minimizing unnecessary use and promoting overall animal health.
- Combat antimicrobial resistance that affects not only the animals, but humans as well, by implementing best practices that limit the use of antibiotics to therapeutic purposes only.
- Enhance product quality and safety of meat products for all consumers by ensuring minimized antibiotic residues, eventually leading to improved public health.
- Meet regulatory standards aligning with EU and national regulations and guidelines regarding antibiotic use, ensuring compliance and fostering trust with stakeholders, including consumer and regulatory bodies.

3. Scope of the Policy

This policy applies to all divisions and enterprises within the structure of Boni Holding:

Pig Farming Division:

- Boni Farm Brestak AD
- Boni Farm Krumovo Gradishte AD
- Boni Farm Zimen AD
- Boni Farm Nikola Kozlevo AD
- Boni Farm Shumen AD
- Boni Farm Levski AD
- Boni Farm Pleven AD
- Boni Fodders Pordim EOOD

Meat Processing Division

- Boni Mesokombinat Lovech AD
- Boni Mesokombinat Karlovo AD
- Boni Mesokombinat Ruse AD
- Boni Marketing EOOD

The policy also applies to all operations and facilities within the company, including:

- Production Facilities: All farms and production sites where animals are raised, ensuring that antibiotic use is monitored and controlled.
- Veterinary Practices: All veterinary staff involved in the diagnosis and treatment of animals, requiring adherence to prescribed protocols for antibiotic use.

- **Supply Chain Partners:** All suppliers and partners involved in the production process, ensuring that they also comply with responsible antibiotic use practices.
- **Training and Education:** All employees, from management to operational staff, will be trained on the importance of responsible antibiotic use and the implications for animal welfare and public health.

By clearly defining the purpose and scope of the antibiotics use policy, Boni Holding fosters a culture of responsibility and transparency, ensuring that all stakeholders are aligned in their commitment to ethical practices in meat production.

4. Legal Compliance

The Company adheres to all EU and national regulatory requirements concerning antibiotic use as a minimum standard, including:

- *Regulation (EU) 2019/6 - On veterinary medicinal products*
- *Regulation (EU) 2019/4 - On the manufacture, placing on the market and use of medicated feed*
- *Ban on Antibiotic Growth Promoters*
- *Farm to Fork Strategy, part of the European Green Deal*
- *Animal Health Law (Regulation (EU) 2016/429)*

5. Policy Statement and Boni's Practices

Boni Holding is committed to the responsible use of antibiotics in meat production, particularly in pig rearing and breeding. Our policy aims to ensure that antibiotics are utilized solely for therapeutic purposes, thereby safeguarding animal health and public health, enhancing product quality, and minimizing the risk of antimicrobial resistance for the consumers of our meat products. We recognize our responsibility to uphold the highest standards of meat production and to comply with all relevant EU and national regulations for the benefit of our key stakeholders – our clients.

5.1. Animal Health Management

First and foremost, Boni Holding takes all necessary measures to enhance the well-being of animals, aligning with all regulatory standards of animal welfare as mandated by EU and national legislation. The Company focuses on and voluntarily implements additional measures such as high quality nutrition, housing, environment and professional health care in order to improve the overall health and resilience of the animals. An immunoprophylaxis program is implemented, along with annual monitoring and control measures.

To maintain a high level of hygiene, we continuously monitor various biosecurity indicators. This includes a comprehensive set of measures that encompass both physical facilities and operational requirements to prevent the introduction of diseases into the farms. The principles of complete emptying and thorough cleaning are applied, with facilities being repopulated only after thorough washing, meticulous disinfection, and drying.

Antibiotics are used only in cases of actual necessity, after all other vaccination and preventive treatment methods for the animals have been exhausted. There are established protocols for when and which antibiotics should be used based on specific cases. We strive to use antibiotics minimally, particularly in the context of reducing antibiotic resistance and ensuring the safety of the products consumed afterward.

Antibiotics use is not merely a goal in itself; rather, it is a humane act aimed at supporting the well-being of the animals.

5.2. Veterinary Oversight

Throughout their lives, all pigs receive high quality veterinary oversight.

We prioritize attentive care for the animals through highly qualified veterinarians and technicians. They are responsible for monitoring the health and condition of the animals, administering treatment when necessary, and conducting preventive care and vaccinations.

Each one of our pig farms has at least one veterinarian or a team of veterinary technicians.

5.3. Treatment Protocols

There are clear protocols for diagnosing and treating sick animals, ensuring antibiotics are only used when necessary.

Clinical examinations are conducted to establish a diagnosis, followed by laboratory tests to determine which antibiotic should be used.

There are two main methods for administering antibiotics:

- Parenteral: This involves injections and is carried out following a diagnosis made by qualified veterinarians or veterinary technicians.
- Oral (Per os): This method involves administering antibiotics through water or feed, using specialized dispensers and proper mixing to ensure uniform distribution and correct dosages for treatment for each animal.

Appropriate implementation of each method ensures that antibiotics are not overused nor underused. Each animal receives individualized treatment. However, in cases of disease outbreaks, treatment is administered to entire groups of animals.

When using antibiotics, we consider and adhere to three main factors:

- Dosage: The appropriate amount of antibiotic to be administered.

- **Duration of Treatment:** The length of time the antibiotic is given to the animal.
- **Withdrawal Period:** The necessary interval between the last administration of the veterinary medicinal product and the slaughter of the animals or the collection of food products from them. This period ensures that no residual substances from the product remain in animal-derived foods in amounts exceeding the maximum allowable limits for active substances, as stipulated by European legislation.

When an animal is treated with a veterinary medicinal product, it is marked accordingly, and the treatment is recorded in a laboratory log, including the expiration of the withdrawal period. This information indicates when the animal can be transported to the slaughterhouse. Prior to sending animals to the slaughterhouse, documentation is reviewed to determine if they have received any veterinary medicinal products, the specifics of those products, and the duration of the withdrawal period. If no medications have been administered, this is also noted. In the slaughterhouses, we implement rigorous controls on meat sourced from our farms. A veterinary inspector conducts an inspection of incoming animals, which includes:

- Verification of origin documents and necessary accompanying paperwork
- For animals that are not slaughtered on the day of arrival, a repeated examination by a veterinarian is performed just before slaughter

All this aims at preventing sending animals to the slaughterhouse before the withdrawal period has elapsed.

5.4. Antibiotic Products Supplies and Monitoring

Antibiotic products are sourced from registered veterinary suppliers based on prescriptions from our veterinarians. We maintain a strict register for all ordered antibiotics, ensuring meticulous tracking of medication usage corresponding to the respective animals. The use of antibiotics is continuously monitored, with a focus on three key factors: dosage, duration of treatment, and withdrawal period. This systematic oversight is essential for maintaining the health of our animals while ensuring the safety of our products for consumers.

We conduct an annual study and perform a number of internal and external checks throughout the year to guarantee high levels of both quality and safety.

5.5. Sustainability Initiatives

Sustainable practices, such as the integration of probiotics, prebiotics, and essential oils, are effectively utilized to control diseases in our animals. Additionally, we implement measures to reduce the pH of the water and ensure its effective disinfection, maintaining a high standard of quality.

5.6. Reduction in Antibiotic Use

Currently minimal use of antibiotics is prioritized to ensure the safety of the meat products. In its future operations, the company will strive to find alternative treatment solutions to minimize and even eliminate the use of antibiotics.

5.7. Supply Chain Management

When sourcing meat or livestock from external farms, including other countries, we expect our suppliers to adhere to generally accepted animal welfare standards and practices, as well as comply with all regulatory requirements as a minimum.

We ensure that our suppliers adhere to legal standards through several key practices:

- Internal Control: Our quality assurance team conducts regular internal checks, including sampling and testing of the meat to verify compliance.
- Documentation from Suppliers: For animals purchased and processed on-site, we obtain declarations confirming that they are free from antibiotics. This documentation is accompanied by veterinary medical records to ensure transparency and compliance.

By following these rigorous protocols, we maintain high standards of safety and quality in the meat we provide.

5.8. Continuous Improvement

Boni Holding is committed to continuously improving its processes and services by setting the following targets:

- Enhance relevant employee training and development, providing ongoing education to ensure that all employees are well-versed in the latest standards and practices regarding antibiotic use. The training shall encompass legal regulations, the importance of responsible antibiotic use, and its implications for animal health and welfare.
- Conducting regular thorough reviews of our practices and policies to enhance animal welfare and ensure the highest level of healthcare for our animals while adhering to ethical standards.
- Implementation of the sector's best practices and active participation in annual conferences to stay informed and gather insights on overall animal welfare practices.
- Focus on research and development in order to improve antibiotic use practices and technologies and find alternative treatment solutions to minimize or even eliminate the use of antibiotics.

- Continuous communication and transparency. Boni Holding will continue to report its antibiotic use performance as part of our sustainability reporting. We are committed to providing clear information on how our policies are made available and ensuring transparency.
- Establishment of a Grievance Mechanism which will allow stakeholders to address any complaints or concerns regarding antibiotic use practices.

By setting these targets, Boni Holding aims to foster a culture of responsibility and transparency, ensuring that our practices align with ethical standards and regulatory requirements. This commitment not only enhances animal welfare but also builds trust with our stakeholders and contributes to a sustainable future in meat production.

6. Roles and Responsibilities

Boni Holding's Veterinary Department is responsible for the clinical oversight of antibiotic use, including prescribing and monitoring treatment protocols.

The responsibilities of the veterinary specialists also include:

- Conducting regular health assessments
- Ensuring compliance with veterinary guidelines and providing training on responsible antibiotic use
- Monitoring animal health and welfare, advocating for alternative treatments, and ensuring that antibiotic use aligns with animal welfare standards.

Operations Management oversees the day-to-day implementation of the policy across all production facilities. Their responsibilities include:

- Ensuring proper training of staff
- Facilitating communication between departments
- Managing the logistics of antibiotic administration.

7. Review and Updates

The Antibiotics Use Policy will be reviewed and updated biannually to ensure it remains aligned with the latest regulations, scientific research, and best practices. This regular review process allows us to adapt to any changes in the industry and continuously improve our antibiotic use practices.

At Boni Holding, we are deeply committed to maintaining the highest standards of antibiotic use in our operations. We recognize the critical importance of responsible antibiotic management and continuous improvement of our practices not only for the

health and welfare of our animals but also for the safety of our products and the well-being of our consumers.

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