

**MAYEKAWA**  
**MYCOM**

# REPORTING MANUAL

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# 1 - Overview

All of us, now and then, have concerns about what is going on at work. Usually, they are easily solved. However, when the concern seems serious because it constitutes a possible danger, professional misconduct or financial negligence that may affect Mayekawa LATAM, it may seem difficult to know what to do. You may be concerned about raising such an issue. You may think it would be better to keep it secret, perhaps because you may think it is not of your business or that it is merely a suspicion. You may think raising the issue might be disloyal to your colleagues, managers, or the organization. You might have said something but figured out that you have spoken with the wrong person or brought the issue up incorrectly and do not know what to do next.

Well, every Mayekawa LATAM employee is expected to conduct company businesses ethically and legally, as detailed in our Integrity Program. Mayekawa LATAM does not tolerate any violation of its Integrity Program. As an employee, you have a personal responsibility for not only being aware of the Integrity Program but also to draw the management's attention to any activity that violates the company's policy or law.

Mayekawa LATAM's policy promotes a climate where employees know they will be supported if they report suspected violations to our Integrity Program. We do not hold any employee responsible for any business loss from compliance with the code.

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Read this document carefully. If you suspect that anyone has violated the Integrity Program, you can provide evidence to support your suspicions; in that case, using the Reporting Manual through the relevant channels is highly advisable. This Reporting Manual provides detailed information about the procedures for reporting and investigating Integrity Program violations and meets the general legal obligations, such as those regarding data protection and the Privacy Protection Commission.

## 2 - Definition

Complaint is the term used when a worker reports information about irregularities. In this directive, we have called it to “disclose” or “blow the whistle.” Usually, the infraction (although not necessarily) is something they have witnessed at work.

A complainant making a disclosure must reasonably believe in two things. The first one is that they are acting in the public interest. It means, in private, that personal complaints and denunciations are not the main reason.

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The second thing that a complainant must reasonably believe that tends to show past, present or future-likely infractions that fit into one or more of the following categories:

- Criminal offenses (it may include, for instance, types of financial impropriety, such as fraud);
- Failure to comply with a law-enforced obligation;
- Legal errors;
- Put somebody's health and safety at risk;
- Harm the environment;
- Conceal an infraction from the categories above.



## 3 - Purpose

The purpose of this policy is to encourage and provide means so that everybody raise and discuss genuine concerns about possible infractions, corruption, negligence and danger that are actually happening, have occurred in the past, or probably will occur in the future.

It is a good practice for an employer to create an open, transparent, and safe working environment where the workers feel capable of talking. Upon having clear policies and procedures to deal with an irregularity complaint, Mayekawa LATAM shows that the information being brought is welcome.

Mayekawa LATAM and its employees are expected to work according to the company's values and business principles established in the Integrity Program and Mayekawa LATAM support directives and policies.

It applies to corporate actions as well as to individual employees' actions. Mayekawa LATAM has a strict compliance policy with the conduct code and does not tolerate any violations of this code wherever it operates. All employees must adhere to this policy and comply with directives and regulations.

Employees are strongly encouraged to report any suspected violation of the code of conduct by using the Reporting Manual options.

## 4 - How to report an Integrity Program violation?

It is important to speak about whether we are aware of anti-ethical behavior or possible violations of the code of conduct, as we may be preventing

a minor issue from escalating to a more serious infraction, and thus help both the company and the persons involved.

The Reporting Manual provides the channels through which you may report any anti-ethical behavior or possible infractions. However, this policy has not been created to allow employees to express their personal complaints.

An outsourced company will receive, ensuring the complainant's exemption and anonymity, such company will conduct an initial analysis and forward it to the Mayekawa LATAM Ethics Committee, consisting of board members. The Committee will go deep into the analysis and will take consensual decisions about the actions to be adopted.



Mayekawa LATAM has chosen the EthicsGlobal company to manage the Reporting Channel, an expert company in this area, and that will ensure impartiality upon receiving complaints and the complainant's secrecy.

Complaints can be done by three different means:

Via a toll-free phone call to **0800 892 3392**;

Via the website **<https://lineaeticamayekawa.ethicsglobal.com>**;

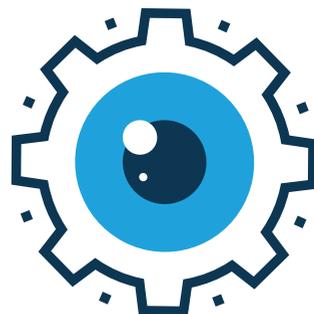
Or via Mayekawa do Brasil's own website under the Integrity Program tab, where you are redirected to **<https://lineaeticamayekawa.ethicsglobal.com>**.

The complainant may remain secret, but if he/she wishes, the complainant may only identify him/her to EthicsGlobal; in this case, Mayekawa LATAM will not have access to this information.

These two options have been prepared to ensure that Mayekawa LATAM is an organization we can be proud of. Be certain that the entire process will occur in secrecy and that there will not be any reprisal/retaliation to those reporting any violation practice in good faith, even if it turns out to be unfunded. All Reporting Manual reports will be treated confidentially.

## 6 5 - Investigation of reported violations

All suspected violations will be investigated with the greatest professionalism, and confidentiality will be kept throughout the entire process. To ensure it will happen, Mayekawa LATAM has published directives for Investigating Reports in the Reporting Manual, which is established below.



### **Any investigation will be conducted objectively**

- The investigation shall be conducted independently, objectively, and impartially;
- The principle of a fair trial will be followed. Everybody will have the opportunity to explain their position;
- The investigation is focused on discovering facts.

### **Compliance with laws and regulations**

- All Mayekawa LATAM applicable laws, regulations, policies and internal manuals shall be considered.

**Any investigation will be conducted with full confidentiality**

- All information regarding an investigation shall be kept in secrecy and shall only be provided to Mayekawa staff who has an absolute need for knowing such information;
- Information will only be added to the investigation as required. Information will not be used to start new investigations unless vital Mayekawa interests or safeguarding Employees' physical or moral integrity are at stake.

**The investigation will begin in a timely fashion**

- The Ethics Committee will appoint the investigator(s) who will conduct the investigation;
- The investigation will begin as quickly as possible after receiving the suspected code of conduct violation report.

**The investigation will be thorough and completed in a professional manner**

- The investigator will ensure that all aspects of the suspected code of conduct violation are duly investigated before the investigation is completed;
- The investigator will report all investigation findings to the Ethics Committee;
- The investigator will issue a final report that will be forwarded to the outsourced company platform that has reported the complainant.

**7****Clear and regular communication will occur during the investigation**

- The investigator shall periodically update the Ethics Committee about the investigation's progress;
- The investigator shall, if the investigation allows, inform the person involved as quickly as possible without compromising the investigation or the evidence;
- The person involved shall be informed about the findings as soon as the investigation has been completed.

**The following investigation methods will be used:**

- Interview;
- Public record research (for instance, Internet);
- Document revision (printed and digital files);
- Email revision (digital communication).

## 6- Confidentiality and Anonymity



The complainant's identity shall be regarded as confidential information. No direct or indirect disciplinary measure whatsoever may be applied due to the complaint, without jeopardizing the corresponding rights, as per regulations in force for the denounced parties.

To ensure their full protection, people belonging to MAYEKAWA LATAM or outside it may report an ethical flaw using our Mayekawa Ethics Channel.

Until the investigation of a complaint is confirmed, appropriate measures must be taken to safeguard the interests of those who provide information or cooperate in an investigation or audit.

MAYEKAWA LATAM and EthicsGlobal ensure high priority to maintain information secrecy. Therefore, such information is protected by physical, electronic, and procedural means. At MAYEKAWA LATAM, we have limited its members' access to the information they "need to know."

### Protection against reprisals

As part of its permanent intent to promote ethical conduct, foster a favorable working environment, and solve conflicts, MAYEKAWA LATAM has developed policies and resources specifically aimed to guide and assist people in their daily tasks. For these initiatives to succeed, everybody must have free access to all resources available without restraints or fear of reprisals.

This policy aims to establish the existing provisions that prohibit retaliation for reporting conduct that may disagree with the ethics or constitute improper acts and outline the paths they will take to deal with reprisal complaints. It is intended to protect people working at MAYEKAWA LATAM and those revealing in good faith an ethical concern, an inadequate activity, a suspicion that improper acts have been committed or taking part in an investigation or internal audit.

Anyone who has a legitimate concern in this sense shall have the

freedom of raising it without fear and feeling confident that his/her cooperation and assistance in reporting his/her suspicions of improper acts will not generate reprisals that affect employment conditions, labor relationships, professional category, or career perspectives. Under this policy, it is strictly prohibited for all personnel working at MAYEKAWA LATAM to retaliate against a person reporting improper acts in good faith or cooperating with an investigation or audit.

Under this policy, contractors, suppliers, and employees reporting alleged irregularities in good faith that people working at MAYEKAWA LATAM or those cooperating with an investigation or audit shall also be protected, as much as possible, from retaliations. Acts of reprisal constitute misconduct, and shall be entitled to disciplinary actions and measures that may even result in employment agreement termination or any other measure deemed suitable as per MAYEKAWA LATAM's rules, regulations and policies.

The Reporting Channel cannot be used improperly as a tool to generate libel or denunciate actions with the intent to generate any kind of self-benefit.

The Mayekawa Ethics Channel shall comply with ethical conduct that has been indicted along this Ethics Channel and good faith denunciations.

## **Sanctions**

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Every occurring conduct that is not allowed will give a reason for a sanction according to the Company's policies. This Code of Ethics and Conduct will be ministered by MAYEKAWA LATAM's Ethics Committee.

Any conduct opposing what is specified in this Code will be considered a contravention of responsibilities attributed to the employee. Illegal or anti-ethical actions are unacceptable, as well as misconduct or unsuitable to any person acting on behalf of MAYEKAWA LATAM.

Those violating the rules of this Code of Ethics and Conduct will be subjected to disciplinary actions that may lead to a justified termination of his/her employment agreement with MAYEKAWA LATAM, regardless if he/she is subjected to other legal actions to which they have originated. If you are in a situation where you may violate or lead to a violation of this Code of Ethics, report it to your immediate superior or via our Mayekawa Ethics Channel.