



WHO WE ARE AND
HOW WE WORK



Integrity Program

The Integrity Program is a summary of the main topics of the Code of Ethics and Conduct, the Code of Conduct for Suppliers, the Competition Law Compliance Manual, and the Complaint Manual.

All employees must be aware of the ethical conducts applied by Mayekawa do Brasil by following the materials mentioned herein.

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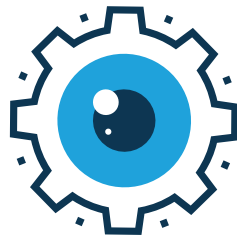
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Overview



The Integrity Program features an overview of the main information, including the business principles and directives relevant to all employees. The code is a statement of what we are and how we work.

Whenever we face tough ethical or legal issues, we must solve them according to our Code of Conduct. This document is an evolving text; therefore, it will be updated when required. As an employee, you will always be notified when a new update is available.

The main sections of this document encompass the following:

Our company, corporate integrity, company's, employee's, and supplier's liabilities.



If you have any doubt about interpreting or applying the code or any other company's policy or directive, please contact your manager or call toll-free to our Reporting Channel at **0800 892 3392**.

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Our mission

Mayekawa and the world to come.

Mayekawa's mission is to provide a cooling solution to ensure food safety, flavor, quality, accessibility, and stable supply, supplying a variety of technologies that are efficient at work,

add high value, make the development of new products easier, save energy, and are eco-friendly. We are committed to creating a century 21 model society in the energy field through cooling technology innovations.



Note 1: Mayekawa do Brasil's Ethics Committee consists of the following: LATAM General Director, South America General Director, and Appointed Director(s).

Note 2: Mayekawa do Brasil's Administration Board consists of the following: Chief Executive Officer, Executive Director, Commercial Director, Industrial Director, and Technical Service Director.

Our responsibility

Mayekawa is committed to creating long-term value for customers, shareholders, employees, and society, acknowledging that sustainable profit is essential for its business continuity. We focus our efforts on our customers' success. In this respect, our responsibility is to provide customers with products and services that offer value in terms of price and quality and meet high standards of health, safety, and environment.

1 - PRINCIPLES AND WORKING ENVIRONMENT

1.1 - Conflict of interest

A conflict of interest is a situation generated by the confrontation between the company's interests, which may compromise the collective interest and improperly influence the performance of its function.

It is expected that Mayekawa LATAM's employees avoid all these situations that in their personal or financial interests may conflict with the company's interest, under the penalty of suffering pertinent legal consequences and procedures.



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1.2 - Relationships with competitors

Agreements that clearly break the law and Mayekawa LATAM-adopted principles are deemed illegal by default. There are no circumstances or explanations that may justify such conduct.

1.3 - Relationship with external partners

All employees must behave professionally regarding external partners. Any private relationship between employees and external partners shall be immediately reported to their manager.

1.4 - Relationship among employees

Employees are allowed to have their relatives and spouse working at the company; however, it is not allowed to hire or keep them in a position where there is a hierarchical relationship.

Any loving relationship among employees shall be immediately reported to both their managers. If there is any doubt about the existence or not of a conflict of interests, the involved managers shall subject it to the Ethics Committee's assessment.

1.5 - Competition law

Mayekawa LATAM works through a strict policy to ensure their operations worldwide fully comply with all applicable competition laws, whose fundamental concepts are featured below:

- *Prohibition of anti-competition agreements and agreed practices;*
- *Prohibition of a dominating positioning abuse or an important power in the market; and*
- *Control of company acquisitions and associations to avoid the creation of any dominating positioning in the market, or competition reduction.*

Each Mayekawa do Brasil's employee in contact with customers, suppliers or competitors is responsible for ensuring they are familiar with our Competition Law Compliance Manual.

1.6 - Dealing with suppliers

Mayekawa is willing to do business with commercial partners who endorse our values and social and environmental standards established in the Code of Conduct for Suppliers.





1.7 - Gifts

No personal gift or favors of any material value can be given to third parties or received from them. A gift or favor of material value is defined as something whose value may influence a purchasing decision and/or lead to a dependence relationship. In case of doubt, a superior shall be contacted.

Employees cannot accept any invitation to events organized, sponsored or paid by external partners without being previously approved in writing by the Ethics Committee.

1.8 - Relationship with public authorities

Employees shall always maintain a respectful and collaborative attitude towards authorities' representatives within the framework of their competences and the investigation and inspection proceedings.



1.9 - Bribery

Bribery and any other means of anti-ethical commercial practice are forbidden. Under no circumstances any Mayekawa's employee or representative may make, offer, promise, or authorize any payment or gift:

- *To obtain any benefit;*
- *To influence any government's policy.*

1.10 - Money laundering

Money laundering is a simulation of a financial operation to justify monetary amounts obtained by illicit or non-declared means.

Mayekawa LATAM does participate in commercial transactions that are considered money laundering.



1.11 - Child labor

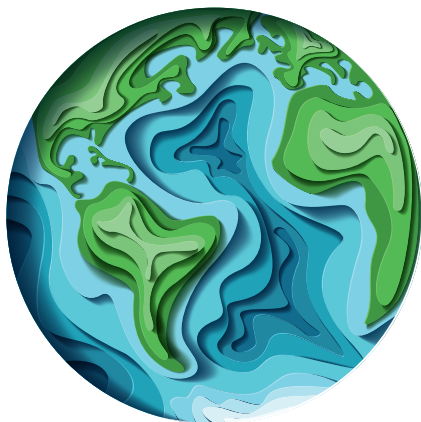
Under no circumstances Mayekawa LATAM employs child labor, not hiring children under the minimum allowed age to exercise any professional activity at its facilities.

1.12 - Slave labor

Under no circumstances Mayekawa LATAM employs slave labor, only hiring employees who work freely and without constraints. No employee is obliged to make payments and is not deprived of his/her personal documents.

1.13 - The environment

Mayekawa do Brasil protects the environment by fully complying with the country's legislation where it is installed, avoiding or minimizing the environmental impact of its activities and products by employing adequate design, manufacture, distribution, and disposal practices.



1.14 - A healthier environment

Mayekawa LATAM offers safe and healthier working conditions to prevent damage and promote the health of all its employees and other stakeholders. Health and safety programs, rules, and regulations are applied at all sites to accomplish it.

1.15 - Equality of opportunities

We are committed to a working environment that is attractive to our employees. We are responsible for recruiting, hiring, and promoting employees based only on objective and non-discriminatory criteria.



1.16 - Violence, moral harassment and sexual harassment at work

Mayekawa LATAM condemns violence, moral harassment and sexual harassment in the working environment and does whatever is in its power to prevent it.

1.17 - Substance abuse

The use of any illegal drugs at Mayekawa's premises is strictly forbidden. As well as performing your professional activities under the effect of any kind of illicit and/or licit substance.

1.18 - Possession of weapons

No weapons are allowed at Mayekawa do Brasil's premises except the professionals authorized to protect the company's employees or assets.

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2 - SECRECY AT WORK AND USE OF THE COMPANY'S RESOURCES

2.1 - Protection of Mayekawa's intellectual property

Mayekawa LATAM has acquired and developed valuable intellectual property, including patents, trademarks, copyright-protected works, and trade secrets. Employees are liable to protect such assets. It is forbidden to share technical information publicly using any means of communication without the written consent of the Administration Board.



2.2 - Data protection

Employees are not authorized to share information and personal data with other employees, third parties, suppliers, commercial partners, and customers without those involved's previous consent.

2.3 - Internet & IT Use

As a general rule, all IT-related resources and facilities are only provided for internal use and/or business-related topics and not for personal use. The IT resources eventually provided to employees shall never be used for personal gain or profit, and they shall not be improperly used during worktime and remain as Mayekawa's property.

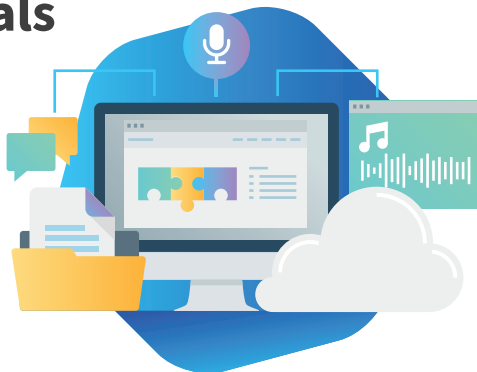


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The creation, release or disclosure of confidential information, images or any other type of document that constitutes Mayekawa's property, its products and/or customers not employing the official communication structures are strictly forbidden.

2.4 - Use of services, tools and/or corporate materials

Whenever Mayekawa do Brasil provides its employees with services, tools and/or working materials, they shall only be used to perform professional activities, and the employee remains responsible for conserving, returning, and properly using the asset provided.



3 - MEDIA RELEASE

3.1 - Media relationships and releases

Contacts with media regarding technical, commercial, social, environmental/financial, or other issues that may affect the company's image shall be reported and discussed with the Administration Board beforehand to prevent conflicting messages on behalf of the company.

Only those Administration Board-authorized employees are qualified to represent and/or answer on behalf of Mayekawa do Brasil.

3.2 - Associate the company with social media

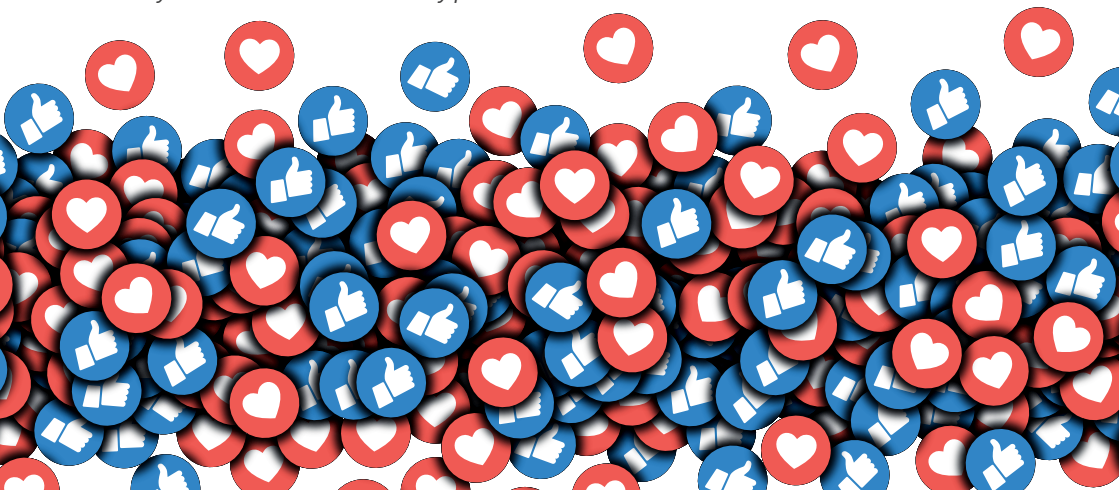
Mayekawa do Brasil expects all its employees and suppliers have an ethical positioning when present on social media since employees are the company's image builders, standing for and building Mayekawa's reputation.

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All principles, guidelines and behaviors set forth in the company's Integrity Program are applicable when participating in social media.

Therefore, the following guidelines are set:

- *Mayekawa do Brasil's marketing area is responsible for creating and managing official social media profiles that are used as a means of communication between Mayekawa and its followers. Therefore, creating profiles and/or accounts at social media mentioning Mayekawa on its behalf is strictly prohibited.*



- *It is forbidden to create, publish, and share content and/or material featuring Mayekawa's logo that the marketing area has not officially released.*
- *The creation, participation, interaction, opinion, or comments made by employees in social media or any kind of written, oral or virtual communication must be strictly personal, not being allowed to associate such materials with Mayekawa's image.*
- *Employees' publications (texts and photos) shall not feature any confidential information or that may be harmful to Mayekawa's image, as well as they not anticipating any results of works that have not been officially released by the marketing area.*
- *It is prohibited to make publications featuring photos and/or videos inside Mayekawa's, suppliers', commercial partners' and/or customers' administration and manufacturing facilities without previous written authorization.*
- *Criticisms about Mayekawa, its employees, suppliers, customers, and competitors on public websites and/or social media are not accepted;*
- *Mayekawa does not tolerate employee-published postings that may disagree with the principles of ethics, of its Integrity Program and may constitute virtual crimes.*
- *It is forbidden to share technical information and operation manuals on public websites.*

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4 - VIOLATION

4.1 - Consequence of Integrity Program violation

Any violation of this Integrity Program is subject to internal, disciplinary penalties and even dismissal for cause. An omission is also regarded as a violation.

If the violation brings damages to the company, Mayekawa do Brasil reserves the right to hold the employee responsible for such damages and to adopt the appropriate legal measures in the labor, civil, and criminal spheres.



4.2 - Confidentiality and e 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 complainant's corresponding rights, as per regulations in force.

Until the investigation of a complaint is confirmed, appropriate measures must be taken to safeguard the interests of those persons who are providing information or cooperating in an investigation and/or audit.



MAYEKAWA LATAM and EthicsGlobal ensure high priority to maintain information secrecy. Therefore, such information is protected by physical, electronic, and procedural means.

4.3 Protection against reprisals

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As part of its permanent intent to promote an 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.

In the face of such a policy, complainants reporting alleged irregularities in good faith or those who cooperate with an investigation and/or audit shall be protected, as much as possible, against reprisals and/or acts of reprisals.

Please be informed that any 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 regulations and policies.

4.4 - Reporting channel

Mayekawa LATAM has chosen the EthicsGlobal company to manage the Reporting Channel to 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 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 keep himself/herself anonymous. Still, if he/she wishes his/her identity is only disclosed to EthicsGlobal. Mayekawa LATAM does not have access to the complainant's identity.





TERM OF COMMITMENT

I hereby state I have read, learned, and thereby commit myself to comply with the requirements stated in the Integrity Program and the Code of Ethics and Conduct of Mayekawa LATAM, and therefore commit myself to respect the determinations and spread the practices contained in such documents.

The violation of such requirements leads to administrative sanctions and/or penalties foreseen in the employment contract and/or in the Brazilian legislation in force.

Name: _____

Federal Individual Taxpayer's ID (CPF): _____

Position: _____

Date: _____

Signature: _____

INTEGRITY
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