



Code of Ethics and Conduct

CONTENT

1. Presentation.....	3
2. Rules of Conduct.....	3
3. Individual Responsibilities	6
4. Management of the Code of Ethics and Conduct.....	12
Annex: Statement of Commitment and Responsibility	14

1. PRESENTATION

This Code of Ethics and Conduct applies to all employees of the business units of NATURAFRIG ALIMENTOS LTDA. ("NATURAFRIG"), regardless of hierarchical level, for the preservation and institutional strengthening of NATURAFRIG.

NATURAFRIG's Code of Ethics and Conduct is a tool designed to foster a harmonious business environment based on honesty and loyalty.

1.1 Objective

The purpose of this set of rules is to clearly convey the values, principles, conduct, and guidelines that should govern the behavior of all NATURAFRIG employees, without exception. It should be used as a guide for professional and personal conduct, enabling employees to perform their duties in accordance with the highest standards of integrity and ethical principles in all aspects of their work, in full compliance with applicable Laws, Rules, and Regulations.

1.2 General Principles

The ethical values that guide the actions of NATURAFRIG and its employees are based on the principles of truth, transparency, justice, a human-centered approach, and respect for ethnic, socioeconomic, cultural, religious, and sexual diversity. NATURAFRIG is committed to improving the quality of life for its employees, their families, the community, and society as a whole.

The rules of conduct that must be observed, adhered to, and respected by all NATURAFRIG employees include the laws of the country; the contracts, agreements, and partnerships entered into by NATURAFRIG; the protection of NATURAFRIG's proprietary information and its confidentiality; among others.

NATURAFRIG believes that every individual plays a vital role in ensuring customer satisfaction, serving as one of the key pillars of its success and growth.

2. RULES OF CONDUCT

2.1 Relations with Government Agencies

There must be strict compliance with the legal, tax, and labor requirements established by the competent authorities and regulatory bodies, through adherence to applicable laws.

2.2 Press Relations

Only individuals duly authorized by the NATURAFRIG Board of Directors may issue statements, give interviews, or provide information to the press on behalf of NATURAFRIG, whether in writing or verbally.

2.3 External Relations

NATURAFRIG expects its employees to commit to treating its customers, suppliers, competitors, and fellow employees fairly, ethically, and impartially at all times. Common sense, respect, and core values should always be upheld in such relationships.

2.3.1 Rules of Conduct for Dealing with Customers and Suppliers

It is the responsibility of all employees to ensure a friendly, responsive, and efficient service, to treat others with respect, and to adhere to standard procedures, providing clear and accurate information in response to NATURAFRIG customers' requests and/or complaints.

This conduct must also be observed in relation to suppliers, which are business partners that enable NATURAFRIG to carry out its activities. All of these individuals should be encouraged and guided to comply with and enforce this Code of Ethics, in addition to the provisions of their respective contracts with NATURAFRIG.

2.3.2 Rules of Conduct Regarding Competitors

Relationships with competitors must be based on respect and adhere to ethical principles, avoiding any actions and/or practices that could constitute unfair competition, among other things.

No employee is authorized to disclose any NATURAFRIG information to competitors.

2.3.3. Contracts with Suppliers

All contracts between NATURAFRIG and its suppliers must be formalized in writing, and their main terms (rights, responsibilities, quality, price, charges, term, and other provisions) should be detailed.

Contracts entered into between NATURAFRIG and its suppliers must be consistent with NATURAFRIG's interests and with this Code of Ethics and Conduct.

2.4 Conflicts of Interest and Influence

A conflict of interest arises when there is a possibility of a direct or indirect divergence between an employee's personal interests and those of NATURAFRIG, which could compromise or unduly influence the performance of their duties and responsibilities; it is characterized by any and all material benefits in favor of the employees themselves and/or third parties (relatives, friends etc.) with whom they have had a commercial, personal, or political relationship.

A conflict of interest is also defined as the use of one's position, role, or confidential information regarding NATURAFRIG's business and/or affairs to influence decisions that would favor one's own personal interests or those of third parties, which is expressly prohibited by NATURAFRIG.

Should such conflicts arise, the employee involved must promptly notify their immediate supervisor, who will make the appropriate decision to safeguard the assets of NATURAFRIG, its customers, shareholders, investors, and other stakeholders.

2.5 Anti-Corruption and Anti-Bribery Practices

NATURAFRIG does not permit its employees to pay or accept bribes or any direct or indirect benefits from suppliers, customers, or partners, nor does it allow its employees to seek preferential treatment through the offering of gifts, promotional items, contracts, business deals, or special sponsorships.

Employees may not accept promotional items, gifts, or any other form of benefit from NATURAFRIG's customers, suppliers, or partners that could result in any form of personal gain or benefit to third parties (relatives, friends etc.).

Therefore, NATURAFRIG employees may not accept any payments or benefits of any kind, either directly or indirectly, from NATURAFRIG's suppliers, customers, or partners, whether during negotiations, during the term of the relevant contract, or after its expiration.

2.6 Environmental Protection Policy

NATURAFRIG conducts its operations with the constant aim of minimizing its environmental impact as much as possible. It continuously reviews and implements procedures to optimize the use of electricity and water, while promoting and encouraging recycling, among other initiatives. For this reason, employees should support these practices and the environment.

In accordance with internal policies and in strict compliance with applicable laws, environmental regulations, and public policies, NATURAFRIG will, whenever possible, give preference to suppliers that work to sustain, protect, and restore the environment through resource conservation, recycling, waste treatment or disposal, as well as other structural or restoration initiatives.

3 INDIVIDUAL RESPONSIBILITIES

3.1 Company Proprietary Information and its Confidentiality

Employees are required to protect and not disclose any confidential information they may obtain or create in connection with their work for NATURAFRIG, regardless of its form.

Your obligation to protect confidential information is not limited to safeguarding it against misuse, but also includes using it solely for the performance of your professional duties. Employees must not disclose confidential information about any NATURAFRIG customer, supplier, or employee to any person who has not been expressly authorized to receive such information (including other employees). Examples of such information include: systems, customer portfolio information, or processes that provide NATURAFRIG with an opportunity to gain an advantage over competitors; non-public information regarding NATURAFRIG's operations; results, strategies, and projections; non-public information regarding business plans and processes and customer relationships; non-public employee information; non-public information received in the course of your work or assignment regarding customers, suppliers, and distributors; and non-public information regarding NATURAFRIG's proprietary technology, systems, and products.

Employees must take precautions to prevent unauthorized disclosure of confidential information. Accordingly, they must also take the necessary steps to ensure that business-related documents are produced, copied, emailed, transported, filed, stored, and disposed of in a manner that prevents unauthorized access to this information.

It is the employee's duty to ensure that access to work areas and computers is properly controlled and to refrain from discussing sensitive matters or personal or confidential information in public places. These spaces include meeting rooms, restaurants, cafeterias, restrooms, hallways, stairwells, and public transportation, as well as the Internet or any other electronic medium (including blogs and social networking sites). Therefore, caution is also necessary when using cell phones or other communication devices or messaging services.

3.2 Relationships and Behavior in the Work Environment

NATURAFRIG is committed to fostering a safe, healthy, ethical, respectful, and harmonious work environment. NATURAFRIG does not permit or tolerate any form of discrimination, prejudice, or humiliating treatment among employees or toward suppliers, customers, or third parties.

NATURAFRIG fosters a courteous and respectful interpersonal relationships, avoiding personal insults, double entendres, and the use of nicknames or profanity, thereby preventing offenses, arguments, and conflicts in the workplace.

Care must be taken with NATURAFRIG's equipment and materials to prevent accidents, loss, damage, and financial loss.

When NATURAFRIG provides vehicles, they must be used diligently, in compliance with traffic laws, and kept clean at all times.

It is the responsibility of every employee to maintain order in all areas of NATURAFRIG, especially common areas such as restrooms, cafeterias, stairwells, hallways, and meeting rooms, among others.

If anyone commits a crime/theft on NATURAFRIG's premises, the company will take all appropriate legal action.

3.3 Assignment of Copyrights and Image Rights

NATURAFRIG has internal surveillance cameras installed for security purposes, and employees should be aware that their images will be recorded daily, in accordance with the law.

The employee authorizes NATURAFRIG to use the content of their presentation and image recorded by NATURAFRIG's internal security cameras for an indefinite period of time, for commercial promotional purposes and all legal purposes, provided that the content of the presentation is maintained and respected.

3.4 Ethnic, Socioeconomic, Cultural, Religious, and Sexual Diversities

Any form of discriminatory expression of any kind (race, color, age, sex, sexual orientation, religion, physical or mental disability, ethnic precepts, socio-cultural condition, nationality, or marital status) directed at any person is expressly forbidden.

3.5 Moral and Sexual Harassment

No form of moral or sexual harassment will be tolerated. Behaviors that constitute moral harassment are those that undermine a person's dignity or create an intimidating, hostile, or offensive work environment. Behaviors such as repeated advances or verbal, gestural, or physical sexual innuendos are considered sexual harassment.

3.6 Intimate Relationships

NATURAFRIG does not permit romantic relationships between employees who have a reporting relationship or whose relationship could, directly or indirectly, influence the other person's work.

Any circumstances that give rise to the situation described above must be reported to the immediate supervisor, and consideration should be given to the possibility of transferring one of the employees to another department within NATURAFRIG or, as a last resort, terminating the employment of one of the parties.

Where permitted, the parties must interact in the workplace as colleagues, ensuring that their romantic relationship does not influence their professional conduct.

3.7 Occupational Health and Safety

NATURAFRIG ensures that all its employees have proper working conditions based on the highest standards of hygiene and safety, and continuously implements and evaluates preventive and corrective measures.

However, it is the responsibility of employees to adhere to the rules and procedures governing their professional activities, ensuring their own safety and that of their colleagues, both internally and when providing services externally.

Contract workers must also comply with the company's safety standards and undergo an onboarding process before beginning any work at NATURAFRIG's facilities.

Contract workers will only be granted access to the areas designated for the provision of contracted services, upon presentation of identification and with proper authorization from the responsible in-house employee.

3.8 Receipt of Mail and Goods

Employees are not authorized to receive mail and/or goods, except for those whose job duties include performing this task.

The improper receipt of mail or goods may result in financial/ legal problems for NATURAFRIG. Therefore, only individuals who have been previously authorized are permitted to perform this type of task.

If NATURAFRIG incurs any charges and/or losses due to the improper receipt of goods or mail that were not forwarded to their intended recipients, those responsible may face disciplinary action and/or termination for cause.

Employees must not disclose NATURAFRIG's address for the receipt/delivery of personal mail and/or packages.

3.9 Use of Computer Systems, Telephones, and E-mail

Computers, telephones, and other electronic communication devices with Internet and e-mail access are provided by NATURAFRIG for use in carrying out the employee's duties and to enable them to perform work-related tasks.

Subject to the limits permitted by applicable laws and regulations, NATURAFRIG may monitor and record the use of equipment and services provided by its employees; therefore, NATURAFRIG's monitoring of electronic equipment made available to employees for the performance of their work-related duties shall not be considered an invasion of privacy.

NATURAFRIG will not tolerate the use of its computer systems, including e-mail and/or Internet services, in any manner that may cause embarrassment or harm the company's reputation and/or interests; nor will it tolerate the creation of a hostile and/or offensive work environment, including, but not limited to, the transmission or exchange of "jokes," photos, videos, or other types of communications and reports that are degrading or offensive to any individual or group.

If an employee receives an inappropriate e-mail from another employee, they should report it immediately to their supervisor. If an employee receives an inappropriate e-mail from an external source, they should delete it immediately and notify the sender not to send similar e-mails in the future. Employees must not send inappropriate messages to other colleagues, even if they are using their personal computers.

NATURAFRIG systems must not be used to upload, download, transmit, or exchange images or electronic text of a sexual nature, or containing distorted ethnic imagery, racial slurs, or any other material of a harassing, offensive, or obscene nature.

If NATURAFRIG detects any irregularities through its monitoring, it reserves the right to block employees' Internet access without prior notice and to impose appropriate penalties for inappropriate use that violates internal policies and applicable laws.

3.10 Information Creation and Management

The information and records used and maintained by NATURAFRIG must be accurate and complete. The employee is responsible for the integrity of data and information, including reports and documents under their control. Records must be maintained with sufficient detail to accurately reflect all of NATURAFRIG's transactions.

Lists of customers, suppliers, service providers, and similar parties are the property of NATURAFRIG; the disclosure and use of these documents for any other purpose is prohibited without the express prior written authorization of NATURAFRIG.

Upon leaving NATURAFRIG, employees may not disclose or use any personal and confidential information owned by NATURAFRIG and must immediately return any copies of such information.

Failure by the employee to comply with these recommendations may result in NATURAFRIG taking appropriate legal action.

3.11 Personal Passwords

Sharing passwords for access to the network and internal systems with coworkers and/or third parties is prohibited, as passwords are personal and non-transferable.

All activities performed are logged and linked to the user's account, so that the user can be held accountable in the event of irregularities resulting from misuse.

3.12 Updating Registration Information

It is the responsibility of every employee to notify the Human Resources Department of any changes to their personal information (address, phone number, marital status, any change of last name, dependents, among others), as well as any leave of absence granted by the INSS [Brazilian National Social Security Institute] or medical certificates.

Changes regarding personal information, address, marital status, dependents, and other details must be verified with copies of documents such as proof of address (water, electricity, or telephone bills), marriage/common-law marriage certificate, birth certificate, death certificate etc.

3.13 Badge

The Employee ID badge is provided by NATURAFRIG. It must be used at all times on company premises and must always be displayed in a visible location. The Human Resources Department must be notified immediately in the event of loss or theft.

3.14 Time Clock and Time Sheet

NATURAFRIG uses Biometric Time Tracking. Each employee is responsible for accurately recording their hours; this is mandatory and must be done daily in accordance with each employee's employment contract.

If an employee notices that the information has not been recorded correctly, they should immediately notify the Human Resources Department.

Unexcused absences and tardiness will be deducted in full, in accordance with the provisions of the *Consolidação das Leis do Trabalho* [Consolidated Labor Laws] (CLT) and other applicable laws.

3.15 Meals

Meals must be eaten in a designated area; eating is not permitted at workstations.

3.16 Smoking

Smoking is strictly prohibited on company premises.

3.17 Consumption of Alcoholic Beverages and Illegal Drugs

NATURAFRIG does not permit the consumption of alcoholic beverages and illegal drugs on its premises, nor does it permit employees to be under the influence of alcoholic beverages and illegal drugs during working hours and/or in the workplace, including during business trips, events, training sessions, meals, or external business activities conducted on behalf of NATURAFRIG.

Any employee caught consuming alcoholic beverages or illegal drugs in the workplace, or who is working under the influence of such substances, will be subject to internal penalties (verbal and written warnings, suspension, or termination, as provided by law), appropriate legal measures, and reporting to law enforcement authorities, where applicable.

3.18 Personal Appearance and Uniform Policy

Employees, in the course of their professional duties, represent NATURAFRIG's image and, for this reason, should take care to wear clothing and accessories that enhance this image, avoiding unnecessary exposure. Personal appearance should be appropriate and tasteful, and employees should avoid wearing clothing that is not suitable for the workplace.

Once adopted, wearing a uniform is mandatory during all working hours, and employees are responsible for keeping it clean and in good condition.

Employees must refrain from wearing their uniforms outside the workplace; any employee who wears a uniform at external events involving police incidents or any other events that could damage NATURAFRIG's reputation will be subject to applicable internal penalties.

3.19 Owned by NATURAFRIG

The employee acknowledges that all pieces of equipment (computers, cell phones, machinery, furniture, vehicles etc.) and other tools provided to him or her by NATURAFRIG for use during work are the property of the company and authorizes the company to inspect, at any time, how such items are being used and their contents, as well as to request their immediate return.

Upon termination of employment with NATURAFRIG, all pieces of equipment and work tools provided exclusively for the performance of their duties must be returned by the employee. Items provided to employees must be returned to NATURAFRIG in perfect working order and in a condition suitable for reuse. If any of the supplied items are found to have been destroyed, damaged, or misused, the company must be reimbursed for the product or its respective value.

For refunds, NATURAFRIG will consider products with identical or similar specifications to the damaged/destroyed item.

3.20 Hierarchical Policy

The company values workplace hierarchy and encourages employees to obey and show the utmost respect to their superiors on work-related decisions, thereby avoiding internal conflicts that could result in penalties under labor law.

3.21 Prohibition on the Sale of Products or Services

Employees at all hierarchical levels are expressly prohibited from selling any products or services to coworkers, suppliers, or customers on NATURAFRIG's premises.

Any employee caught selling any type of product or service, or collecting payments in the workplace, in a manner that causes embarrassment, will be subject to penalties and appropriate legal action. Furthermore, failure to comply with this rule will be considered unethical conduct.

4 MANAGEMENT OF THE CODE OF ETHICS AND CONDUCT

4.1 Violations of the Code of Ethics and Conduct

Each employee is fully responsible for understanding the policies and practices set forth in this Code.

If inappropriate conduct or a violation of any provision set forth in this Code is found, appropriate disciplinary measures will be taken, including warnings, suspensions, and terminations, while always ensuring the full and comprehensive right of the parties involved to defend themselves and present their case, without prejudice to applicable legal penalties.

If any employee identifies or suspects that this Code of Ethics and Conduct is being violated, or that there is a possibility or imminent risk of a violation, they must report the conduct through the channel www.canalproetica.com.br/etica/naturafrig, via e-mail naturafrig@canalproetica.com.br, or by phone 0800 0500068.

An employee's failure to report knowledge of potential violations by other employees or suppliers will also be considered misconduct and unethical behavior.

4.2 Contact

If you have any questions about the most appropriate conduct, please contact NATURAFRIG's Human Resources Department.

4.3 Statement of Knowledge and Commitment

All employees must carefully read this Code of Ethics and Conduct, complete and sign the Statement of Commitment and Responsibility attached to this Code, and submit it to their immediate supervisor, who must then forward it to Human Resources, as the statement will be filed in the employee's personnel record. Failure to submit it does not affect the applicability of this Code of Ethics and Conduct or any of its provisions.

4.4 Waivers or Exceptions to the Code of Conduct

Any exemption from compliance with the rules set forth in this Code of Ethics and Conduct requires the prior and express approval of the members of NATURAFRIG Board of Directors, which will receive requests for exemptions, along with supporting documentation, through the Human Resources department.

ANNEX

**STATEMENT OF COMMITMENT AND RESPONSIBILITY TO THE RULES
SET FORTH IN THE CODE OF ETHICS AND CONDUCT OF
NATURAFRIG ALIMENTOS LTDA.**

I,, employee ID No. ,
as an employee of NATURAFRIG ALIMENTOS S/A, hereby declare that I have received a copy
of NATURAFRIG's Code of Ethics and Conduct, that I am fully aware of the contents of said Code,
and that I agree with its provisions, committing myself to comply with it throughout the term of my
contract and thereafter, as applicable. I further declare that I am aware that any violations of this
Code, as well as of NATURAFRIG's policies and rules, will be investigated and subject to
appropriate disciplinary action, without prejudice to any applicable legal penalties.

Place, on,

.....

Employee's Signature