



Code of ETHICS *and Conduct*

GLOBAL PRESENCE

Companies belonging to Plastic Division are part of one of the biggest and better world steel tool production and thermoplastic part injection, **Grupo Simoldes**. In order to assure that this strength keeps growing, it is vital that every worker knows how to develop and do their job, having as fundamentals always professional values as Quality, Consistency, Security and hygiene.

We intend to keep and develop steady commercial relationships with our customers, offering them a Quality service, with the lowest costs that allow the company to obtain the necessary gains to grow and develop. That way stability conditions are created that contribute to the economic wellbeing of each worker and their family.

On the other hand, all Simoldes Group workers should undertake the personal commitment to develop their tasks with professionalism, hygiene, security and transparency, trying always to solve found insufficiencies.

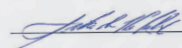
The will to keep and consolidate a work environment at Plastic Division Simoldes Group, where personal and professional development are encouraged, strives us forward to achieve together a **COMMON GOAL**.

We are sure that a lot of questions may rise, to answer them and clarify all doubts our organization will always be available through our Human Resources Management.

All points mentioned in the Code of Ethics and Conduct are mandatory to be obeyed and applied by all workers. All managers are responsible to assure that the Code is implemented and respected at all levels of the company. Each new worker will receive a copy, the Code will be available at our intranet (Portal) and official Simoldes website.

Management approves this document and assures its whole application.

Oliveira de Azeméis, 2017
Management



(António da Silva Rodrigues)

OUR PRESENCE

PORTUGAL



Simoldes Plásticos, S.A.



Implás - Indústria de Plásticos, S.A.



Plastaze - Plásticos de Azeméis, S.A.

GERMANY

Simoldes Plásticos
Deutschland Engineering

POLAND



Simoldes Plásticos
Polska, SP Zoo

CZECH REPUBLIC



Simoldes Plásticos
Czech SRO

SPAIN

Simoldes Plásticos
Espanha, S.L.

FRANCE



Simoldes Plásticos
France, SARL
Simoldes Plásticos
France Engineering

BRAZIL



Simoldes Plásticos
Brasil



Simoldes Plásticos
Industria Brasil

MAROC KENITRA



Simoldes Plásticos
Maroc Kenitra



HEADQUARTERS AND TECHNICAL CENTER



PRODUCTION UNITS (OWNED)



ADVANCED CUSTOMER SERVICE CENTER

MISSION

“To be the preferred choice of our customers, employees and suppliers, contributing to sustained growth and the satisfaction of our stakeholder.”

VALUES

*“Deliver our commitments.
Trust each other.”*



CODE OF ETHICS

What is the Code of Ethics and Conduct?

The Code of Ethics and Conduct (“Code”) is a document which contains a group of principals that rule the companies belonging to Simoldes Group Plastic Division (“SIMOLDES”) and a group of rules of ethical nature to be observed and respected by all Management members and workers.

For whom it is intended?

The Code is intended to all members of the board administration and all employees of the companies belonging to Simoldes Group Plastic Division, service providers and all who represent the companies, in their relationship with customers, suppliers and partners, as well as any entity that establishes relations with “Simoldes” (in this Code named as “employees” and partners”).

How is the Code disclosed?

The Code is disclosed to all workers and partners and is available for consultation at our intra net (Portal) and at our website.

Any doubt related to the interpretation or application of this Code should be reported to the Ethics Committee through the e-mail:
Ethics.Committee@simoldes.com

Who to contact in case of doubt concerning a dubious behavior?

Any worker or partner can contact the Ethics Committee in order to obtain clarification concerning a behavior or contract that is about to be fulfilled and for which there are doubts concerning ethical issues.

Any worker or partner that has any evidence concerning irregularities toward other coworkers or partners, should contact Ethics Committee.

In order to answer to all eventual doubts that may arise related to the Code, a e-mail address was created that can be used by every worker or partner:

Ethics.Committee@simoldes.com

In case of report of alleged irregularities, employee or partner should inform if they intend to remain anonymous, that indication will be respected by Simoldes; in any case the issue will always be handled with discretion.

If the Ethics Committee considers that there are facts that prove the informed irregularity to be true, all suitable disciplinary actions will be taken.

With which goal was the Code created?

The Code was created with the fundamental goal to:

- Share the principals that guide Simoldes activity and the ethical rules that should ground the behavior of all employees and partners.
- Promote and encourage the adoption of performance principals and behavioral rules established in this Code, relationships between employees, between employees and Simoldes, Shareholders, Customers, Suppliers and public Authorities.
- Strengthen the institutional Simoldes Image that represents excellence, demand, responsibility and discipline.



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SIMOLDES VALUES

Values that follow us

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SIMOLDES ACTION PRINCIPALS

*Principals that shape
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*Rules that assure
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01

SIMOLDES VALUES

Values that follow us

ACT TAKING CARE OF THE PRESENT AND FUTURE

Ethics and trust

As fundamental compromise we have the creation of economic value based on ethical principals and sustainable development, in a long term horizon grounded on trust relationships with our interested parties.

Efficiency

We value efficiency and healthy competition, trying to optimize the use of our resources and maximize their return.

Ambition

Is our guiding strenght embodied in the continuous establishment of goals that keep the resilient and brave company attitude, encourage and defy our competences and add value to our customers.

People in the centre of our success

We promote capacity and competency development of each one through constant challenges, willingness for change and team work.

We believe that all this, combined with a internal culture that promotes merit, are crucial factors to attract, keep and develop workers with high skills and potential.

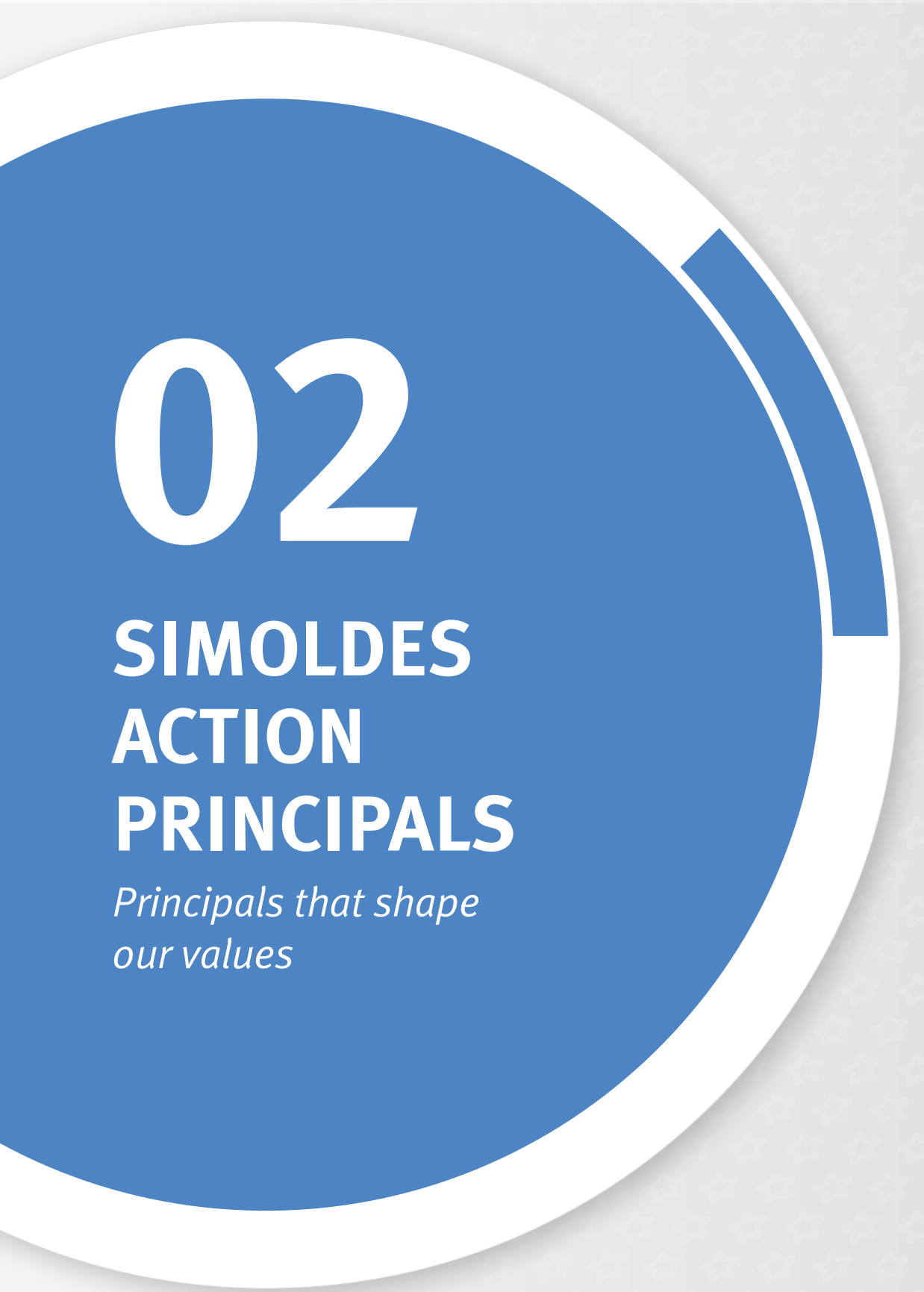
Cooperation, quality and flexibility

We value the quality in task execution, multifunctionality in task execution, as well as shown availability, schedule flexibility and not less important team work with consequent adapt capacity to organizational company culture.

Inovation

Is in the essence and origin of our products and business.

Based on the concept “doing the right things right, first time”, we believe that learning happens also when you make mistakes and fail, however knowing the importance of balancing this fact in regular risk pattern.



02

**SIMOLDES
ACTION
PRINCIPALS**

*Principals that shape
our values*

ONE TEAM ONE MISSION ONE SIMOLDES

*Professionalism,
respect and loyalty*

Stakeholders and market

- Act always in order to assure interests and generate more value for our shareholders.
- Assure rigor and truth of the available information for shareholders and market, doing it on time.
- Maintain confidentiality of all information to which you have access during job performance.

Competition

- Respect the rules and market criteria, encourage a healthy and loyal competition, avoiding any practice that may prevent, falter or restrict in a sensitive way the competition.
- Relate with competition in a friendly way and encourage mutual respect, namely for intellectual property rights of each one.

Customers

- Treat customers with professionalism, respect, straightforwardness and loyalty, in equality conditions and without any type of discrimination, namely in given information and claim treatment.
- Provide to the customers products and services of excellence, always honoring our commitments and applicable legislation.

Employees

- Rule colleagues and hierarchical superiors relationships with cordiality and respect.
- Develop and keep an open and straightforward dialogue during conflict resolution, with total respect for difference of opinions.
- Promote a good work environment, always defending Simoldes interests and not individual, group or area.
- Treat employees with justice and enhance personal and professional development and opportunity equality. Through a rigorous and constructive evaluation, that involve rotation and function flexibility, schooling and professional and personal development and encourage participation in extra professional activities.
- Respect the balance between professional and personal life of the employee.
- Protect all employees from any kind of harassment (sexual, moral,...). In case there is a report of any type of harassment examine the authenticity always protecting the complainant and eventual witnesses. Proven to be true, duly established disciplinary actions will be taken and current law applied.

UNITED NATIONS GLOBAL COMPACT

Simoldes Group seeks to follow, in adaptation to our production reality, principles patent in the United Nations Global Compact.

“An initiative planned for organizations committed to align their operations and strategies with their universally accepted principles in the areas of human rights, labor, environment and anti – corruption. Thus, corporations which are the main agents of globalization, can help ensure that market organizations, commerce, technology and finance progress in ways that benefit economics and societies everywhere.”

Simoldes Group defends the fundamental human rights established in the 8 conventions published in 1998 by the international labor organization.

All employees, trough their conduct and responsibilities have to assure that the company complys with all fundamental prnciples of the ILO.

These conventions cover the following areas:

- Labor union freedom and acknowledgment of right to collective negotiation.
- Elimination of all forms of forced and mandatory labour.
- Effective abolition of child labor.
- Elimination of discrimination related to job and occupation.



**HUMAN
RIGHTS**

PRINCIPLE 1

**Businesses should support
and respect the protection
of internationally proclaimed
human rights**

Simoldes Group is committed to comply with the law, to take into account the consumers concerns, to treat their employees with dignity, to be a model for the community in which it operates and to respect basic human rights. The business world has the potential to impact – positively and negativitely – virtually all human rights.

The company provides safe working conditions, enables freedom of association, ensures that there is no professional scope, doesn't use forced or child labor, actively contributes to the improvement of the livelihoods of local communities and essentially offers jobs with dignified and decent conditions, improving the quality of life of its employees and families, treating all employees with respect and consideration for their human condition.

PRINCIPLE 2**Make sure that
they are not complicit
in human rights abuses**

Compliance with human rights policy helps the company to reduce the risk of being implicated in human rights violations, demonstrating that all measures to avoid involvement have been adopted.

Respect guidelines and international standards governing the use of force.

The ongoing systematic violations of human rights are condemned privately and publicly.

**LABOR****PRINCIPLE 3****Businesses should uphold
the freedom of association and
the effective recognition of the right
to collective bargaining**

Simoldes Group values freedom of expression. The strategic focus for the coming years focuses on the search for a fruitful work environment where communication between employees and (with) their superiors is considered a competitive advantage. Over the years companies have maintained a conciliatory relationship with local unions and recognize the workers right to organize as a collective organization of the workforce, taking into account the legislation.

PRINCIPLE 4**The elimination
of all forms of forced
and compulsory labour**

Simoldes Group ensures freedom of choice in employment and eliminates all forms of compulsory labor.

The company adopts clear practices not to use, be accomplice of, or benefit from forced labor.

PRINCIPLE 5**The effective abolition
of child labour**

Simoldes Group complies with national legislation and regulations governing child labour, including recommendations described on the United Nations convention of child rights and the conventions of the International Labour Organization (ILO).

Suppliers are advised not to employ children under the age of 16 and to meet the convention's requirements mentioned above regarding health, safety and morals of young people aged between 15 and 18.

Nevertheless, it is a group policy not to hire temporary or permanently, young people under 18.



PRINCIPLE 6**The elimination of discrimination
in respect of employment
and occupation**

Attract and keep the best people based on their capacities and merit and maximize all opportunities in order to assure that all employees share from the success of Simoldes.

Keep good relationships with all workers through internal informative systems of consulting.

Create a open and honest culture where it is expected that the individuals behaviour between them is always based on respect and personal consideration.

Not tolerate and kind of abuse and “bullying”. Sexual harassment and harassment based on race, religious beliefs and sexual orientation are unacceptable.

These harassments are harmful and contrary to Simoldes values and illegal in most of the countries where Simoldes works. Discrimination based on race, gender, age, religious beliefs, incapacity, marital status, political orientation, ethnic or social origin and nationality; are not acceptable.

Violation of this principle will result in disciplinary actions including contract termination when justified.

**ENVIRONMENT**

Adopt the best environmental practices, such as promote an ecoefficient management, minimizing environmental impact that occur from our work, using in a more rational way the natural resources.

Promote, spread and encourage employees, partners, customers and community in general of good environmental practices.

PRINCIPLE 7**Businesses should
support a precautionary approach
to environmental challenges**

The key element of a precautionary approach, from business perspective, is to accept the notion that it is more profitable to quickly adopt measures to ensure that irreversible environmental damages do not occur.

PRINCIPLE 8**Undertake initiatives
to promote greater environmental
responsability**

Employees are, among other practices, urged to reduce waste and reduce the use of polluting products, conserve natural resources and recycle materials at all stages of the production process.

PRINCIPLE 9**Encourage the development
and diffusion of environmentally
friendly technologies**

Implementation of environmentally friendly technologies is a concern of Simoldes Group, aiming the use of cleaner, more efficient materials in search of economic and environmental benefits in the long run.

**ANTI-
-CORRUPTION****PRINCIPLE 10****Business should work against
corruption in all its forms, including
extortion and bribery**

Corruption can take many forms that vary in degree and ranging from the use of influence to institutionalized bribery. It is the abuse of power for private gain but also non-financial advantages.

Companies cannot, under any circumstances, directly or indirectly, offer, promise, give, request or accept any bribe or undue advantage.

They should also promote awareness of the company policy regarding corruption and use of financial and accounting procedures, reasonably conceptualized in order to secure and maintain records, account books and other, rigorous and transparent.



ONE TEAM ONE MISSION ONE SIMOLDES

*Professionalism,
respect and loyalty*

Suppliers

- Choose suppliers based on clear and impartial criteria, but always giving priority to those that share more ethical principles with Simoldes.
- Treat suppliers with respect and professionalism, by honoring our commitments.

Social communication

- Avoid media disclosure about any information concerning Simoldes activity that has not been previously authorized.
- Communication with social media should only be made by Simoldes Group management, general manager and human resources manager, or by someone expressly authorized by Simoldes Group management.

Work environment, health and security

- Create a good work environment, assuring the compliance with environment, hygiene and security regulations that differ from country to country.
- Develop your work in a safe way, in order not to harm yourself or others.
- Promote communication and information share between employees.
- Promote team spirit, share of common objects and mutual aid between employees.

Public authorities and regulatory entities

- Respect and assure the detailed compliance with the legal standards and regulations applicable to Simoldes activities.
- Offer public authorities the necessary collaboration to develop their activities, by making available all necessary information that may have been requested.

Communities

- Assure transparency concerning available environmental information.
- Adopt non discriminatory well fare practices.

03

INDIVIDUAL RULES OF CONDUCT

*Rules that assure
our principles*

SUCCESS OF ONE IS THE SUCCESS OF EVERYONE

Professionalism

- Act in a responsible and rigorous way, searching to improve and update knowledges with the goal of continuous improvement of professional capacity.
- Apply the knowledge and most accurate techniques and the necessary effort for the compliance of the tasks trusted to each employee.
- Contribute to the Simoldes success in a consistent, creative, committed and persistent way.

Responsibilities

- Respect Simoldes values and existing principles in the Code, either on the internal or external relationships.
- Rule their conduct by the strict compliance of responsibility and autonomy limits.

- Report any possible irregularities (behavioral or circumstantial) that may jeopardize business development or Simoldes good reputation.

Integrity and conflict of interests

- Act in a honest way, not looking for or accepting from a third party any kind of compensation, favor or advantage by acts practiced at Simoldes service.
- Avoid to intervene in decision processes that involve directly or indirectly organizations with whom we work or have collaborated with people with whom they are connected due to family relationship ties or friendship.
- In the impossibility of not being able to not intervene in the above – mentioned processes, employees should inform that fact to the hierarchical boss (existence of such ties).
- Not participate or develop functions in organizations where the developed activity may collide with the achievement of functions being performed at Simoldes.

Interpersonal relationship

- With internal and external parties assume a honest, trustworthy, cooperative, loyal and communication clear behaviour; contributing for the maintenance of a good work environment.

Independence

- Act in defense of Simoldes interests with impartiality towards others.

Confidentiality and use of privileged information

- Preserve facts or confidential information, respecting the existing rules for this matter.
- Not use privileged information for personal benefit or benefit of others.

Protection and use of Simoldes resources

- Take care of the protection and good conditions of Simoldes resources, available for job performance or to any other resources that may be available for that purpose.
- Use Simoldes resources in a rational, responsible and efficient form, aiming to achieve the goals that were established.
- Respect the internal regulation for resources.

Gifts and commercial offers

- Not accept or own benefit goods, services or any other advantages (including christmas gifts) from customers, suppliers, service providers or any other individual or collective entity that have or want to have a commercial relationship with Simoldes. Nevertheless if the non acceptance turns out to be inadvisable or impossible, the referred goods will be delivered to Simoldes and will be taken care of by Simoldes.
- The previous restriction does not apply to offers or payments of goods and services, such as travels, meals, accommodation or shows, that are giving by others to an employee due to job performance, representing Simoldes.
- The above mentioned exceptions should be previously communicated to the hierarchical superior.
- The offer of gifts to any external entity, made by a Simoldes employee, is only acceptable when made in name of the company, is related to job performance and corresponds to regular use or practices of the sector, and must be previously approved by the respective hierarchical boss.
- Offers or acceptances, in any circumstances independently from value, money, bank checks and other goods are subject to legal restrictions.



RGPD

- Treating personal data according to rules applicable in the laboral scope and data protection or information security, such as Code of labor, the regulation of general data protection and the personal data protection law, and according to the labor terms celebrated with the contract.
- General personal data processing operations are according to the data protection policy available for consultation at our website site www.simoldes.com/plastics/ and at our intranet <http://portal.plasticos.simoldes.com/ia/rgpd/>

Data protection officer contact:
protecaodedados@simoldes.com

Loyalty and compromise

- Protect the good image, credibility and Simoldes prestige under all circumstances.

Legality

- Act always according to the law in force and applicable regulations.





04

**ETHICS
COMMITTEE**

Members of the Ethics Committee are:

Jaime Sá

(Member of the Board)

Domingos Pinto

(CEO – Chief Executive Officer
Plastic Division – Group Simoldes)

António Couto

(Operation Management
Plastic Division – Group Simoldes)

Alexandre Batista

(TQM Total Quality Management
Plastic Division – Group Simoldes)

Paulo Bastos

(HR Management
Plastic Division – Group Simoldes)

Luis Teixeira

(HR Plastic Division
– Group Simoldes)

In order to assure the highest levels of good business practices, the administrative council of Simoldes created a Ethics Committee to protect and follow the implementation of this Code. This committee is also responsible for updating this Code whenever necessary, after consultation with steering board and respective validation.

Ethics Committee is responsible for doubt clarification that may be placed concerning the existing Code, investigating every complaint.

They have the responsibility of starting and supervising the investigation of alleged irregularities and has to assure that all necessary disciplinary measures are taken.

In order to answer to all eventual questions that may rise related with the ethic behaviour of Simoldes Group (such as human rights violation), a electronic e-mail address was created that all employees can use:

Ethics.Committee@simoldes.com

Management of this mailbox is made by a member that does not belong to the Ethics Committee, in order to assure that the process is fair and free from manipulation.

Total discretion in the handling and answer are assured, as well as protection of the complainant and eventual witnesses.



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