



Code of **ETHICS**
and Conduct

GLOBAL PRESENCE

Companies belonging to Simoldes Plastics are part of one of the biggest and better world steel tool production and thermoplastic part injection, **Simoldes Group**. 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 Plastics workers should undertake the personal commitment to develop their tasks with professionalism, hygiene, security and transparency, trying always to solve found insufficiencies.

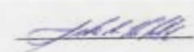
The will to keep and consolidate a work environment at Simoldes Plastics, where personal and professional development are encouraged, strives us forward to achieve together a **COMMON GOAL**.

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 and will be available at our intranet, in the official Simoldes website and in PortalSP, as well as in all electronic compliance platforms.

Management approves this document and assures its whole application.

Oliveira de Azeméis, 2024
Management



(António da Silva Rodrigues)

OUR PRESENCE

PORTUGAL



Simoldes Plásticos, S.A.



Inplás – Indústria de Plásticos, S.A.



Plastaze – Plásticos de Azeméis, S.A.

GERMANY

Simoldes Plásticos
Deutschland Engineering

POLAND



Simoldes Plásticos Polska, SP Zoo



Simoldes Plásticos Polska Zory

CZECH REPUBLIC



Simoldes Plásticos Czech SRO

FRANCE



Simoldes Plásticos France, SARL

Simoldes Plásticos France Engineering

SPAIN

Simoldes Plásticos
Espanha, S.L.

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, workers and suppliers, contributing for a continuous growth and our Stakeholders satisfaction.”

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 Plastics (“SIMOLDES”) and a group of rules of ethical nature to be observed and respected by all Management members and workers or partner entities.

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 Plastics, 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 and in all electronic compliance platforms available in Simoldes.

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

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

Any worker or partner can contact the Compliance Office 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 or compliance.

Any worker or partner that has any evidence concerning irregularities, qualified as an illegal act, non-compliance or situation of abuse, towards other coworkers, partners, should contact Compliance Office.

In order to answer to all eventual doubts that my rise related to the Code, a e-mail address was created that can be used by every worker or partner: compliance@simoldes.com, and all interested parties can also use any of the Reporting Channels accessible from the website www.simoldes.com or the Whistleblower Protection Platform of the Group’s companies, accessible at www.whistleblowingofficer.com/simoldes, to which all employees can appeal.

In the case of reporting alleged irregularities or submitting complaints, the Employee or Partner may choose to remain anonymous, with the protection of whistleblowers being guaranteed and the confidentiality of communications or complaints guaranteed.

If the Compliance Office considers that there are facts that prove the informed irregularity to be true, all suitable disciplinary actions will be taken, will take the measures deemed necessary, promoting the application of appropriate disciplinary sanctions.

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.



01

SIMOLDES VALUES

Values that follow us

Pág. 7

02

SIMOLDES ACTION PRINCIPALS

*Principals that shape
our values*

Pág. 9

03

INDIVIDUAL RULES OF CONDUCT

*Rules that assure
our principles*

Pág. 18

04

COMPLIANCE OFFICE

Pág. 23

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 Stakeholders.
- Assure rigor and truth of the available information for Stakeholders 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 anykind of harassment (sexual, moral, labor...). In case there is a report of anytype of harrasment examen the authenticity always protecting the complainant and eventual witnesses. Proven to be true, dully established disciplinary actions will be taken and current law applied.

UNITED NATIONS GLOBAL COMPACT

Simoldes Plastics 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 Plastics 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 colective 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 Plastics 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 negatively – 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, do not allow any type of abuse, exploitation, trafficking, and any other form of violence and/or torture of the human being, 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.

SIMOLDES and business partners ensure that the commissioning or deployment of security forces does not lead to violations of Human Rights. SIMOLDES and business partners ensure not to contribute directly or indirectly to supporting private or public security forces that unlawfully exercise control over all interested parties.

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

Simoldes Plastics 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 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 Plastics 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 Plastics 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.

Do not tolerate any type of abuse or “bullying”. Multiple forms of harassment, whether moral, labor or sexual, and abuse based on race, religious beliefs or sexual orientation are considered 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 any of this principals will result in disciplinary actions including contract termination when justified.

SIMOLDES and business partners respect the rights of minorities, vulnerable groups and local communities to decent living conditions.

**Fundamental sustainability
requirements**

SIMOLDES PLASTICS considers compliance with sustainability requirements as essential and fundamental in the relations with all interested parties. We hope that they incorporate the values associated with sustainability requirements into their activities through structured and competent management.

We must identify and evaluate legal and other requirements, as well as provide training to our employees to ensure compliance with relevant Customer requirements and, consequently, in the supply chain.

Given that these sustainability requirements go beyond the requirements stipulated by applicable legislation, it is crucial that they are also considered.

In addition to the mandatory requirements present in this Ethic Code, other important requirements are highlighted in the Supplier Quality Manual.

As a sustainability requirement for business ethics, SIMOLDES PLASTICS and commercial partners must develop and implement robust policies to comply with legislation associated with the import and export of goods, services and information.

The commercial relationship must be approached with transparency, fairness and responsibility, especially in contexts where sanctions and export controls are relevant. It is intended that these policies are considered by all commercial partners in your supply chain.

Implementation of a management system in the supply chain

Management Systems, ISO 14001 and ISO 45001 are extremely important for organizations around the world, which provide guidelines and structures for environmental management and occupational health and safety management, respectively.

SIMOLDES PLASTICS intends for business partners to consider the implementation of ISO 14001 and ISO 45001 Management systems, which play a fundamental role in the process of continuous improvement of business practices, ensuring not only legal compliance, but also promoting environmental sustainability and workers well-being.

ISO 14001 is an international environmental management standard that helps organizations identify, manage, monitor and control their environmental impacts. Implementing sustainable practices, reducing waste and minimizing air pollution, whilst demonstrating a clear commitment to protecting the environment.

ISO 14001 certification promotes a company's differentiated reputation regarding of environmental responsibility, which results in financial savings through reduced operational costs and legal compliance with legal requirements.

ISO 45001 is an international occupational health and safety management standard that aims to protect the health and safety of workers in an operational context. It allows organizations to identify and control risks related to health and safety, promoting a safe and healthy working environment for all employees.

The implementation of ISO 45001 reduces work accidents, injuries and occupational illnesses, resulting in a healthier, more motivated and productive workforce.



Adopt the best environmental practices, such as promote an ecoefficiente 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, suppliers 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 a business perspective, is based on the immediate adoption of appropriate measures to mitigate environmental impacts.

Emission of GHE (Greenhouse gas Effect)

To mitigate environmental impacts, especially about greenhouse gas emissions, business partners are expected to adopt appropriate measures. This includes implementing strategies to reduce gaseous emissions that pose risks to both the environment and human health. A proactive approach to improving the environmental performance of products and services is encouraged, with a focus on reducing greenhouse gas emissions across the supply chain. This can be achieved, for example, by increasing the use of low-carbon energy resources.

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

All Stakeholders are, among other practices, encouraged to reduce waste and reduce the use of polluting products, consciously manage the consumption of Chemical Products, achieve greater energy efficiency using renewable energy, legally comply with the management of waste, air quality control, in order to promote healthy working conditions, conserve natural resources and recycle materials at all stages of the production process in order to increase greater environmental responsibility.

SIMOLDES PLASTICS and its commercial partners must ensure that their activities do not cause harmful changes to the environment, avoiding soil, water and air pollution, as well as excessive noise emissions and excessive water consumption. These measures aim to preserve the natural bases of food, drinking water and protect people's health.

SIMOLDES PLASTICS and its commercial partners must respect the prohibition of illegal eviction and the prohibition of illegal deprivation of land, forests and waters in the acquisition, development or other use phase.

Efficient use of natural resources and energy

SIMOLDES PLASTICS, together with business partners, must encourage the implementation of measures that ensure the efficient use of energy, water resources and raw materials, promote the use of renewable energy resources to minimize negative impacts on the environment and workers' health.

In the context of water consumption, preventive measures associated with responsible practices must be considered, based on a risk analysis process, and particularly the geographic location of production sites. Reducing waste, possible reuse, recycling, with processes suitable for better use and minimization of natural resources.

Control, registration and evaluation of substances and raw materials

Business partners must implement appropriate measures to avoid and eliminate the use of materials and/or substances with a negative impact on the environment and the workers health, through a risk analysis, in accordance with applicable legislation in force and in compliance with mandatory OEM requirements.

Biodiversity

Aligned with the same SIMOLDES PLASTICS Principles, business partners must commit to ensuring the necessary measures implementation to protect ecosystems, allowing the maintenance of natural habitats at risk of extinction and the conscious use of natural resources.

Forest dismantling, pollution, uncontrolled urbanization and the introduction of invasive plant and animal species, as well as climate change, put the preservation and protection of biodiversity at risk.

Ethical treatment of animals

SIMOLDES PLASTICS and its business partners must support and promote the ethical and human treatment of animals.

Circular economy and waste management

Business partners must adopt appropriate measures to reduce waste production, reuse waste and surplus material in a safe and ecologically responsible way.

Such measures must be implemented at all stages, from development and production to the product's life cycle and recycling at the end of its useful life, in addition to other relevant activities.

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

Implementation of environmentally friendly technologies is a concern of Simoldes Plastics, 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.

Companis 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.

Compensation and Benefits

- The remuneration and benefits paid and/or received for each working day always correspond to an amount higher than the Minimum Guaranteed Monthly Remuneration defined for the respective country. If there is collective agreements, a value higher than the minimum value set per professional category always applies.
- Pursuant to the above, SIMOLDES regulates the benefits it attributes in its Motivation Plan accessible on its internal portal.

Work Schedule

- The Normal Working Period, daily and weekly, corresponds to those defined under the applicable national law, in strict respect for legally defined rest breaks and daily breaks, according to the work schedule map prepared and posted at the workplace.
- Overtime is provided under the terms, and within the limits, provided for by national law and, if there is applicable collective bargaining, under the terms regulated therein. Likewise, the hours bank practice is established in accordance with collective bargaining, when applicable.

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 Plastics management, general manager and human resources manager, or by someone expressly authorized by Simoldes Plastics 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 welfare 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 given 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.



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.

Personal data protection and information security

- Act in accordance with the company's commitment to protecting personal data and information security, applying technical and organizational measures considered appropriate to ensure a level of security appropriate to the risk, following the system of (i) technical security measures, (ii) organizational security measures, (iii) contacts of the team Responsible for Security and (iv) forms for reporting security or cybersecurity incidents, through the Data Protection and Privacy Policies accessible at www.simoldes.com or www.dataprotectionofficer.help/simoldes/policies, and exercising the rights, namely the rights of access, rectification, opposition or limitation of processing and erasure through contacts with the Data Protection Officer available at www.dataprotectionofficer.help/simoldes/data-protection-officer.

Reporting data breach and security incidents

- Ensure regulatory compliance with applicable standards, in accordance with the Data Protection and Privacy Policies and Information Security Policies applicable in the company, reporting, without undue delay, the occurrence of incidents of breach of personal data or information security who are aware or who are in any way involved, (i) using for this purpose the model forms available at www.dataprotectionofficer.help/simoldes/forms, (ii) directly contacting the Data Protection Officer through any of the contacts available at www.dataprotectionofficer.help/simoldes/data-protection-officer or (iii) contacting the team responsible for Information Security through the contacts available at www.dataprotectionofficer.help/simoldes/security.



Whistleblower protection and reporting channels

- Report illegal practices, non-compliance or situations of abuse through the different Reporting Channels made available for this purpose, with the electronic reporting platform accessible through the link www.whistleblowingofficer.com/simoldes and it being possible to consult the Reporting Handling Procedure, as well such as the Whistleblower Protection Policies, through the link www.whistleblowingofficer.com/simoldes/regulatory-noms.
- Complaints submitted will be assessed by the Team Responsible for Handling Complaints in the company's Compliance Office, and can be contacted directly via email at compliance@simoldes.com.

Prevention of corruption and related offenses

- Act in accordance with the company's commitment to Preventing Corruption and Related Offenses, not tolerating any type of practices or acts that qualify as such, applying the Corruption and Related Offenses Risk Prevention Plan, accessible at <https://anticorruptcao.pt/simoldes/p/programa-de-cumprimento/planoprevencao/>, and using a specific Reporting Channel, accessible at <https://anticorruptcao.pt/simoldes/p/programa-de-cumprimento/planoprevencao/> to communicate these situations, communicating, without undue delay, the occurrence of any situation qualifying as such, to the Team of Persons Responsible for Handling Complaints or to the Person Responsible for Regulatory Compliance, through the contacts available at <https://anticorruptcao.pt/simoldes/p/equipa-de-responsaveis/>.



04

**COMPLIANCE
OFFICE**

Members of the Ethics Committee are:

Responsible for Regulatory
Compliance:

Paulo Bastos

(HQ Human Resources Manager Simoldes *Plastics*
– Simoldes Group)

Team Responsible for Handling
ComplainTs:

Manuel Melo

(Data Protection Officer – Simoldes Group)

Ana Pereira

(Human Resources Simoldes *Plastics*
– Simoldes Group)

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

The Compliance Office is responsible for doubt clarification that may be placed concerning the existing Code, investigating all reported complains.

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 respond to all possible questions that may arise related to the ethical conduct of Simoldes *Plastics* (e.g. illegal acts, non-conformities, situations of abuse or situations of human rights violations, environment claims and unethical business practices), any interested party may contact us via from the email address compliance@simoldes.com or use any of the Reporting Channels available on the Simoldes Group Whistleblower Protection Platform accessible through the link www.whistleblowingofficer.com/simoldes.

The management of this mailbox and all Reporting Channels is carried out exclusively by the Team Responsible for Handling Whistleblowing Reports, in accordance with the Whistleblower Protection Procedure applicable in Simoldes Group companies, ensuring the confidentiality of communications and the transparency of all the procedures.

Version 4_2024

