

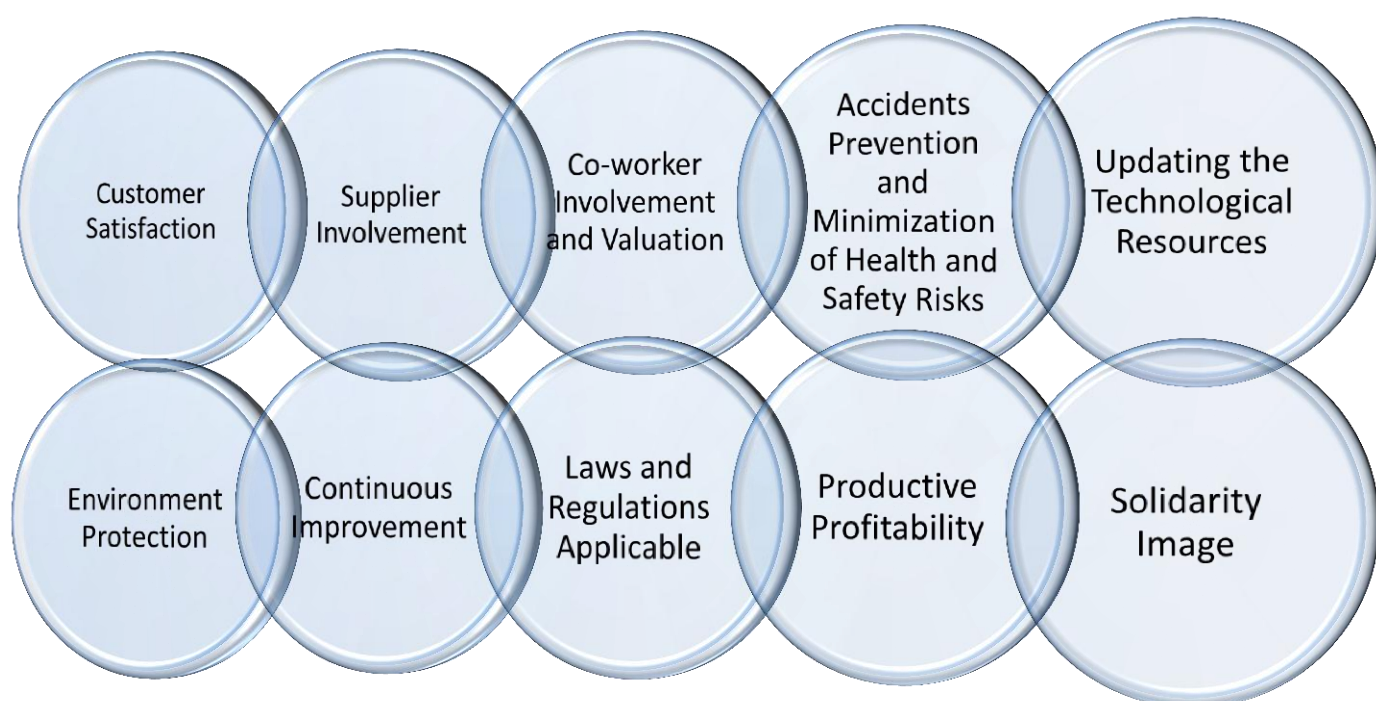
CODE OF ETHICS AND CONDUCT



INTRODUCTION: SIMOLDES GROUP BASIC PRINCIPLES

Simoldes Group (SG) is currently considered the largest manufacturer of molds in Europe. Over half a century the Group has contributed predominantly to the current position of the sector, globalizing its market, strengthening and dignifying internationally the image of the Portuguese industry through technological development, the correct production planning and quality control, the investment in vocational training and the increment of external demand.

To ensure our existence and long-term success the Group's efforts aim at excellence, emphasizing the values and company policy, which are based on the Administration strategic guidelines.



With these guidelines the Group intends to establish itself as a socially responsible organization, guided by a strong sense of ethics which should be reflected on a sustainable growth policy and an exemplary behavior from their managers, employees and, more ambitiously, customers, suppliers and the community at large.

THE CODE OF CONDUCT

The Simoldes' Code of Ethics and Conduct arises from the need to provide clear guidelines and principles that should govern the professional activity of the day-to-day life of everyone involved.

In the situation we find ourselves in the challenge is no longer just survive and grow in the market, but grow sustainably, becoming aware of the impacts caused by the activity we develop, taking responsibility in the footprint we leave and use the resources we have to give economic, social and environmental contribution to society and the world we live in.

This code should be the pillar of our attitudes regarding our internal and external relations so that the Group is perceived as an ethical and responsible company; it also establishes the company's commitments in the area of fair business practices, and should be a reference document for internal use and in the relationship with customers and suppliers.

The Simoldes Group is committed to promote the collective interest, to direct employees to a strategic and organizational goal and to share successes, reward collective and individual results and enable dedicated professionals in order to achieve stability and corporate sustainability, success and satisfaction for all and be a reference at an international level.

The provisions of this Handbook are mandatory for all employees. Supervisors are responsible for ensuring that the Code and the procedures here inscribed are implemented at all levels of all the companies. A copy will be handed to new employees and will be available on the intranet to be consulted by all Simoldes universe.

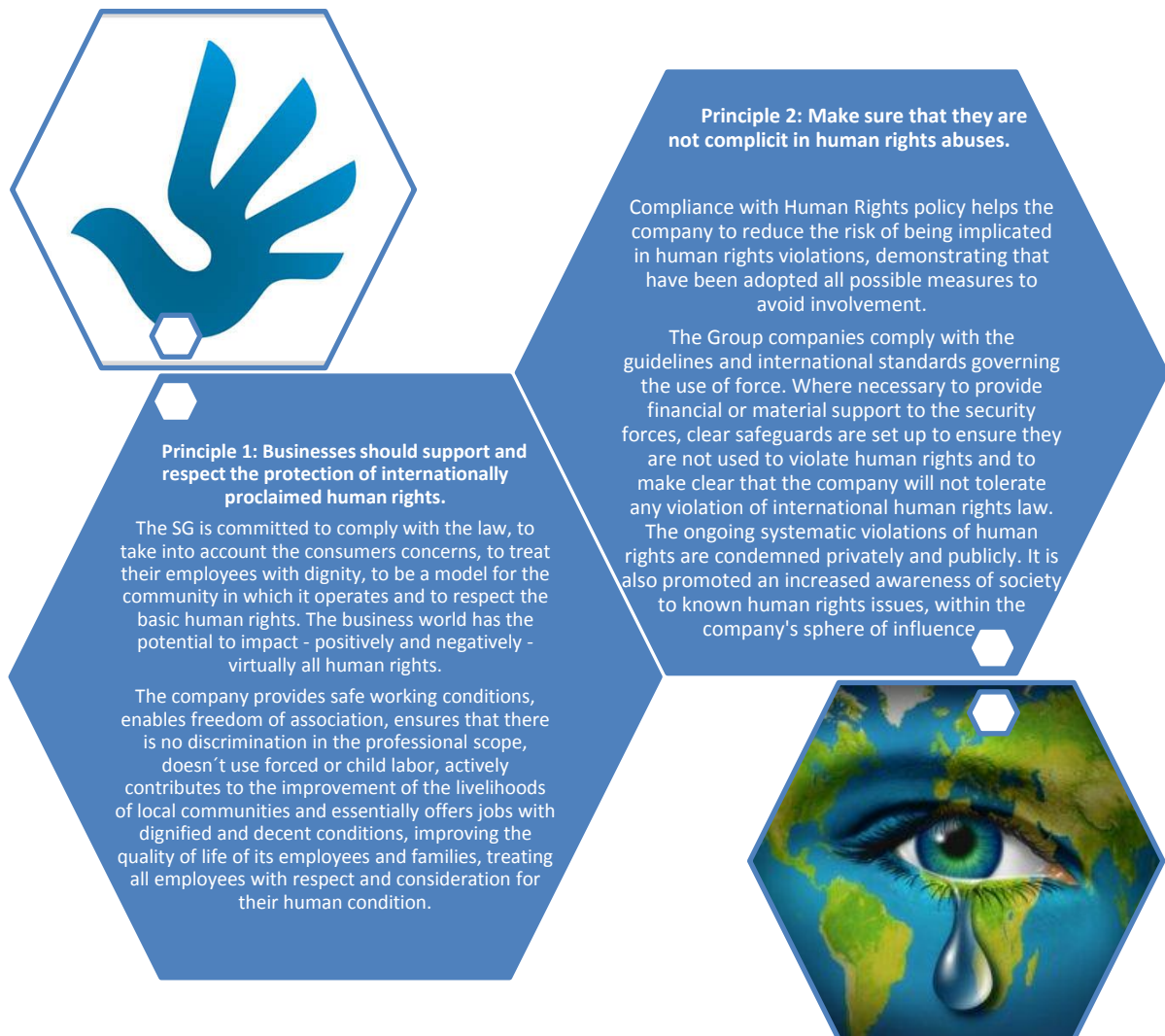
The Administration approves this document and ensures its full implementation, promulgating it.

Oliveira de Azeméis, 30th of July, 2015

THE UNITED NATIONS GLOBAL COMPACT

The Simoldes Group seeks to follow, in adaptation to our production reality, the principles patent in the United Nations Global Compact, “an initiative planned for organizations committed to align their operations and strategies with ten 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 economies and societies everywhere.”

HUMAN RIGHTS



LABOR



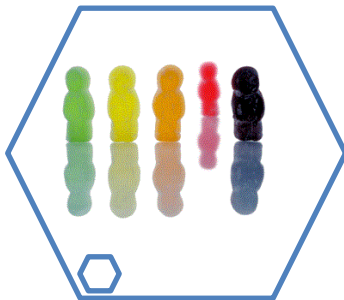
Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

The SG 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 the competitive advantage that has the potential to be. The companies have maintained over the years 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.

All employees have the possibility of forming or joining a trade union of their choice without risk of intimidation or reprisals, in accordance with national legislation. The company does not interfere with the activities of workers' representatives, as they perform their duties in ways that are not harmful to the regular activities of the company. The union are allowed to charge their commissions on the company premises, to poste union information and distribute documents proving the good relations between management and workers.

Principle 4: The elimination of all forms of forced and compulsory labour.

The SG ensures the freedom of choice in employment and eliminates all forms of forced or compulsory labor. Forced labor is not only a violation of fundamental human rights, but also deprives societies of the opportunity to develop skills and human resources, and to educate children for tomorrow's labor markets. Thus, the debilitating consequences of forced labor are not only felt by individuals but also by society and the economy in general. Retarding the proper development of human resources, forced labor lowers the level of productivity and results in less safe investments causing slower economic growth. The loss of income due to the disruption of regular jobs or income-generating activities reduces the lifetime earnings of potential householders and is therefore likely to lead to the loss of food, shelter and health care to entire families. Forced labor situations are often characterized by lack of consent to work and the threat of a penalty (the means of keeping someone in a forced labor situation). The company adopts clear practices not to use, be accomplice of, or benefit from forced labor and to ensure that all employees have a full understanding of what forced labor is. All employees have employment contracts stating the terms and conditions of their service, the voluntary nature of employment, the freedom to leave (including the appropriate procedures) and any penalties that may be associated with a departure or cessation of work. Large-scale development operations are not based in forced labor at any stage; the supply and subcontracting chains are closely monitored.



Principle 6: The elimination of discrimination in respect of employment and occupation.

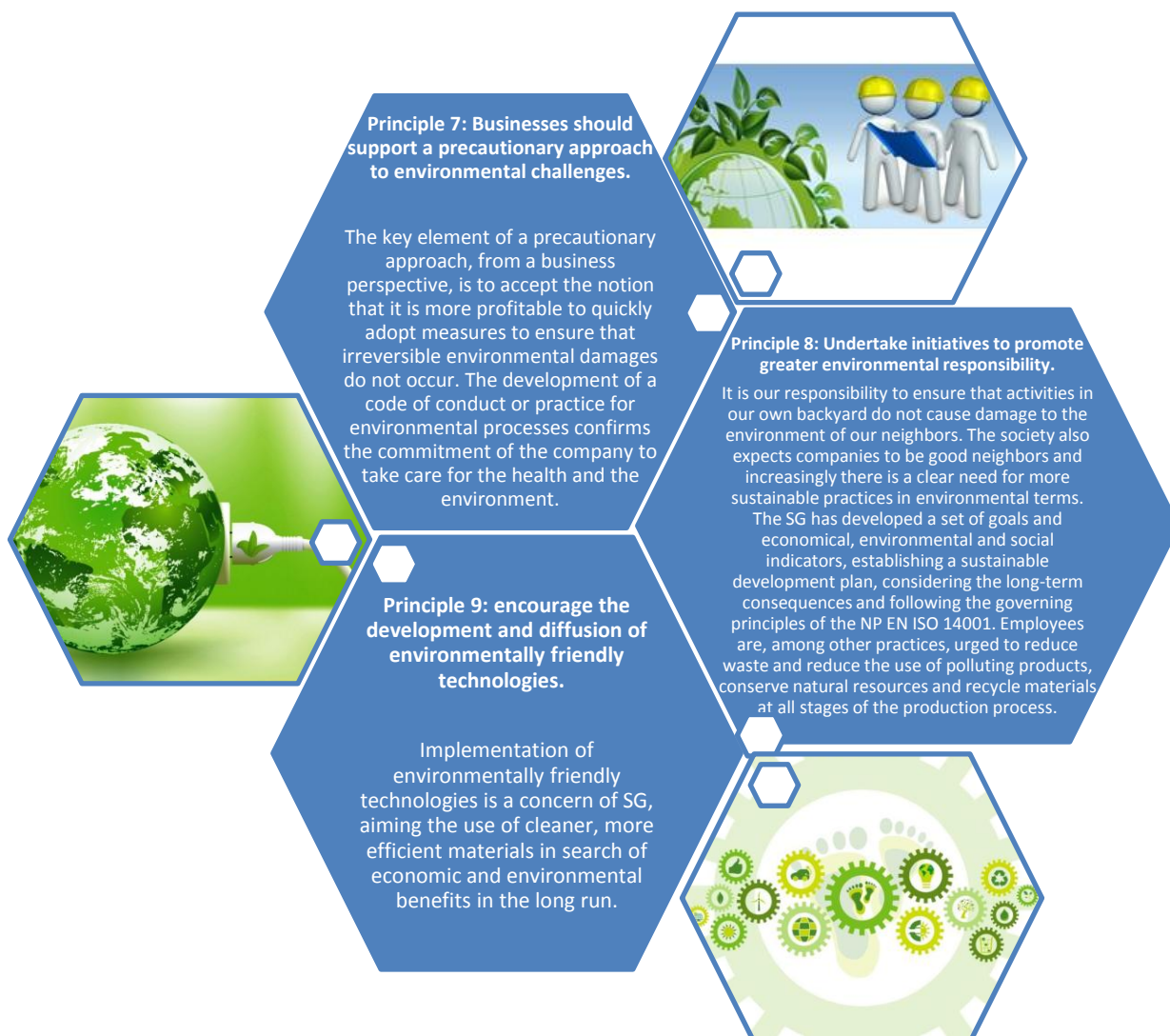
Group companies guarantee a career and recruitment policy free of discrimination based on age, gender, race, nationality, physical or mental disability, sexual orientation, political, religious or trade union affiliation. It is strictly forbidden differential treatment of employees for having features not related to their merits or requirements of their function. Any activities that make the workplace a hostile environment, including bullying and / or sexual practices are discouraged and in some cases punished by disciplinary or legal sanctions. The non-discrimination policy also applies to remuneration, work and resting hours, vacations, maternity leaves, job security, task assignment, performance evaluation, among others.

Principle 5: the effective abolition of child labour.

The SG complies with national legislation and regulations governing child labor, including recommendations described on the United Nations Convention of the Rights of the Child 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 effectively, young people under 18.



ENVIRONMENT



ANTI-CORRUPTION



FAIR BUSINESS PRACTICES

The company and its partners must comply with all applicable laws and regulations including those related to fair competition. Any understandings, agreements, plans, arrangements or schemes, whether written or oral, between competitors involving price, territory, market shares and / or customers are strictly prohibited.

USE OF FUNDS, SERVICES AND GOODS



All financial and accounting records of the companies should be made with great clarity and accuracy and in compliance with all principles, laws, rules and regulations of accounting standards.



It is strictly forbidden the misuse of funds, services and goods of the company, particularly in the form of bribes, gratuities or other illegal payments, whether in cash or other benefits.



Payments or the provision of services or goods to political parties, candidates or elected officials are discouraged. The same applies to governmental or administrative agencies, which could be considered as attempts to influence government decisions in favor of the company.



The company's employees must also take responsibility for the zealous and prudent use of available equipment and goods, avoiding waste or use for personal gain. It is expected that the employee protects, within the extent of possibility, the assets of the company, avoiding loss, damage, theft, misuse, diversion or destruction. In the event of witnessing these situations, the employee shall immediately inform his superior.



All goods, materials and equipment must be used in accordance with the rules defined by the company and is prohibited their use by third parties. The employee is responsible for protecting all passwords and codes of their knowledge.

RELATIONSHIP WITH SUPPLIERS AND CUSTOMERS

The choice of suppliers must be made following fair, impartial and transparent criteria, based on their quality, performance and costs. It is the negotiator duty to try to get the best possible conditions, without any favoritism or discriminatory criteria.



Employees should refuse any gratification, payment, favor, gift in any form, particularly money, from clients or suppliers. When awarded with an offer, the employee must politely decline or return it quickly. When it is considered impolite to refuse or return the offer, it is imperative that the superior is informed. He will decide what to do with the offer.



The sponsorship of suppliers or customers in order to get some commercial or financial compensation is advised against.



No employee may invest directly or indirectly in a SG supplier, relatives of suppliers or subsidiaries, or grant them loans, with the exceptions established by law.

CONFLICT OF INTERESTS



Employees shall not use their relationship with the SG to gain advantage for themselves or for people of their relationship. To ensure an impartial, objective and transparent performance, situations where there is conflict of interests should be identified and employees must refrain from intervening in decision-making processes involving organizations where they have worked in, or where people who have family ties, affinity or friendship work in. All employees must communicate to their superiors the exercise of any activities that may converge with the activity of the company.

CONFIDENTIALITY

The organization shall comply with all laws and regulations relating to the protection, use and confidentiality of personal data.

The information related to employees, including salaries, performance evaluations or any other element part of the personal employee files, should be handled by authorized personnel only and should not be disclosed to third parties except in special cases authorized by the laws in force.

The procedure should be the same with respect to the information that is intellectual property of the company. Employees are obliged to secrecy and must maintain, at all times, confidentiality, not manipulating or disclosing it to third parties. The commercial, financial, technical, technological information, databases, or other relating to customers, suppliers or employees cannot be disclosed without the express authorization of the competent bodies.

