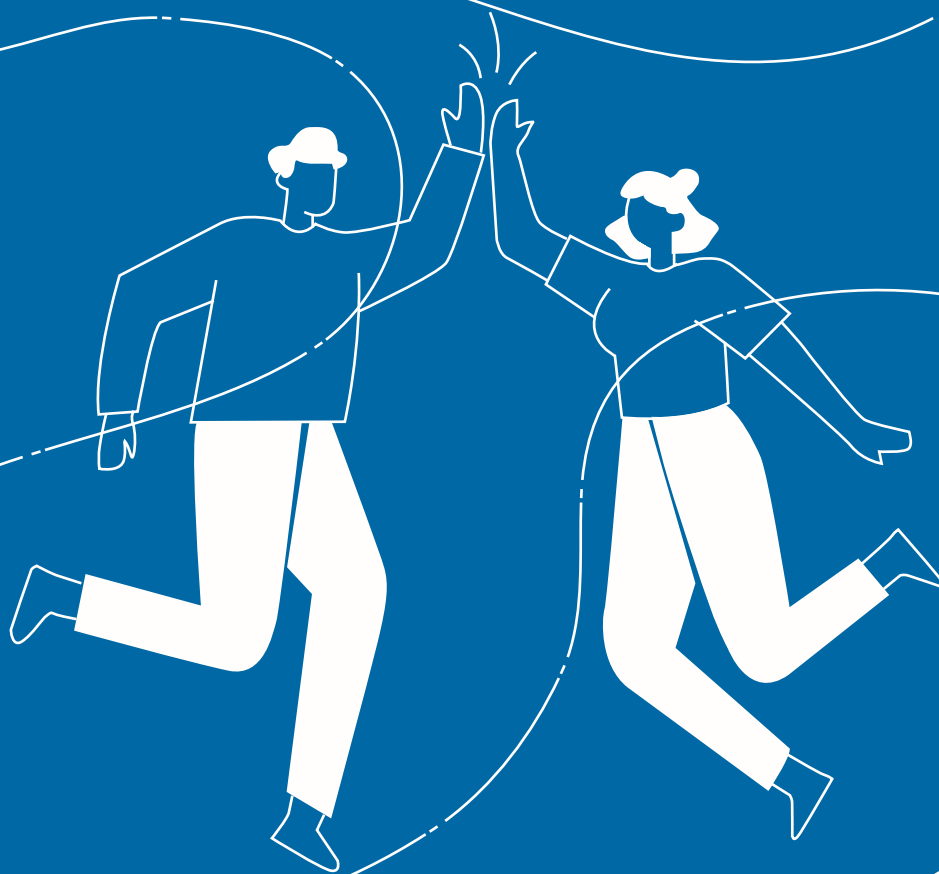


# Code of Ethics



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# Objective, Scope and Definitions

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## Objective

The Code of Ethics is an instrument that aims for the fulfilment of the principles and mission of the ERT Group. Its main purpose is to establish a business conduct respected by everyone that belongs to the organization. As such, the present code aspires to guide and clarify ERT members about which rules, behaviours and attitudes must be followed within the organization, regardless of time or location, towards costumers, clients, suppliers or any other interested(ed) part(s).

The Code of Ethics establishes the values and ethic boundaries regarding the ERT Group anywhere in the World, as well as its responsibilities regarding interested parts.

## Scope

The code of Ethic concerns and applies to all ERT Group Members (now assumed as ERT), which withstands every society that may have a relationship with the Group.

The administration can and will use all means at its disposal to enforce the obedience and respect of the norms contained in this code

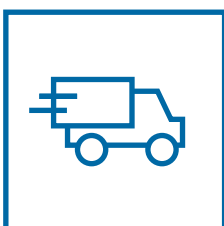
## Definitions

“ERT Group” comprehends ERT Automotive, ERT Industrial, HOUSPRNG, WTEX, KLEBERT, LÍDIO BRANDÃO, XVISION and UOU.



### Collaborators

Includes every member of social organs and all collaborators of ERT Companies under any title or any form of connection.



### Suppliers

Single or collective individuals that provide products or services to ERT.



### Clients

Single or collective individuals to whom ERT sells products.



### Interested Parts

Also referred as *stakeholders*, concerns any person, entity or group that affect or can be affected by ERT activities or associated performance, including collaborators, shareholder, Clients, Suppliers, Counterparts, Business Partner, Competitors, Public Authorities and Local Authorities.

## Mission and Values

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### Mission

We thrive to be a reference of Corporate Innovation, prospecting an unremitting improvement of resource management, outcome excellency, people's qualifications and knowledge use that allows the Innovation Effect.

### Values

ERT Members must consider values such as:

#### Market Orientation

Promote client satisfaction and fidelity.

#### Creation of Value

Constant performance improvement through investigation and innovation.

#### Responsibility

Respect the foundations of sustainable economic, social, and environmental development.

#### Human Resources Motivation

Create conditions for organizational success.

## Actuation Principles

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ERT Group, which headquarter is in São João da Madeira, has developed is activity since 1992 and maintained, since then, an incessant activity throughout the different countries.

Aiming to correspond to the market requirements of the market and its clients, through a sustained business model, qualified and motivated resources, producer of economic, social, and environmental value, beholding an attractive return to the shareholders.

Its history and dimension have determined responsibilities towards its external environment, its collaborators, partners, those who establish a relationship with ERT and, obviously, society in general.

Regarding ERT's actuation, the following values are, at any given time or moment, fulfilled:

- a) Respect for the Universal Statement of Human Rights.
- b) Rebuff to any kind of Child Labour.
- c) Obedience to any legal imposition in countries in which ERT performs activities.

- d) High standards concerning ethics and integrity in business leading.
- e) Responsible Social Conduct.
- f) Environmental Reverence.

ERT and its collaborators must guide their actuations through honesty, integrity, transparency, and professional diligence principles, as well as respecting the following norms:

### **Confidentiality and Professional Secrecy**

All collaborators, even after ceasing their functions within the ERT Group, are imperilled to professional secrecy, in particularly to those matters which, by their nature, objective significance, internal decisions or legal imposition, must not be of general knowledge.

All collaborators are obliged to, irrespective of time or location, safeguard any fact or information that may have been acquired during their job. Respecting those rules that circumscribe ERT universe is mandatory, not allowing ERT intervening's to use such data to their favour or benefit.

ERT proprieties include any sort of confidential information including intellectual property such as commercial secrecy, patents, brands (including logos, emblems or insignias), author rights, photographic pictures, business, marketing plans and services, politics and procedures, manuals, projects, databases, wages, financial evidence and reports. The unauthorized distribution of such matters violates ERT principles and can constitute a legal violation that may incur a civil or criminal penalty.

### **Conflict of Interests**

All collaborators must avoid situations susceptible of generate conflict of interests, striding back of intervein or influence any decision made by entities with which may (or not) have collaborated with ERT, not disregarding individuals that can, in any form, be related to them. Beholding such impossibility, they are impelled to communicate such information to their responsible.

All collaborators must abstain to realize any role in societies that are not part of ERT Group when such positions are able to compromise their performance and dedication to ERT Group, or in any kind of organization, institute or entity which intentions may collide or hinder with those stipulated by ERT.

All collaborators are prohibited to use ERT´s name, logo, information, equipment's, time, or other resource to enrol in activities that were not approved by ERT.

All collaborators external activities must be kept away from work.

All collaborators must withhold to negotiate, for personal purposes, in any contracts or transactions that differ from those who are considered normal. This standard also applies to entities whit whom ERT preserves a relationship, namely in loan negotiations, obtention of discounts or payment periods.

### **Professional Pride**

All collaborators must perform with professional pride, applying their knowledge and know-how most convergent whit their assignment, employing the proper effort to conclude the tasks inherent to their work.

## Loyalty

All ERT collaborators must safeguard, under any circumstance, maintain a positive image, credibility and prestige of the ERT Group, assuring that their public manifestation regarding the organization, either by written or spoken language are not considered as official comments about the company. When taking part in events sponsored by ERT or their providers / suppliers, they must guarantee their upmost professional behaviour when considering their representing ERT.

Under no circumstance are ERT collaborators authorized to emit commentaries concerning any legal matter in which ERT Group may be involved. Any comment made on this matter must be forwarded to ERT's administration.

## Equality

The ERT Group assumes its commitment to treat all collaborators fairly, neglecting any difference related to race, gender, nationality, religion, incapacity, sexual orientation, job hierarchy or association to unions or labour associations.

Equality in opportunities means:

- Treat all persons fairly, without partialities.
- Create and sustain a free work environment, without intimidation, repression, or harassment.
- Encourage, support, and develop capacities in collaborators to maximize their contributions towards ERT.
- Ensure that all collaborators have equal opportunities to develop their capacities and can access in their careers according to their potential.

ERT Group acknowledges that Equal Opportunities is essential to achieve success:

- Improvements in safety and quality.
- Improvements in individual performance.
- Improvements in client service and public image (reputation).
- Improvements in R&S processes.
- Improvements in utilizing and evaluating performance and individual capabilities.
- Improvements in absenteeism and diseases prevalence.

## Responsibilities

All collaborators must care for maintaining ERT's buildings and equipment in good condition, employing efficiently the resources and avoiding waste. Samey, collaborators must withdraw from using ERT's possessions in self advantage.

ERT's information services, where computers, email accounts, internet access, mobile phones and voicemail are included, are propriety of such company, and, consequently, must only be used for professional purposes.

Text messages, emails, and other types of communication, sent or received by ERT collaborators during their functions, can be acceded by ERT, within legal limits, if such information represents the need to.

## Corruption and Bribe

It is expressly prohibited, to all ERT collaborators, to practice any kind of corruption, either in passive or active form; omission or creation and maintenance of irregular situations.

ERT collaborators compromise to:

- Refuse to receive or to emit any offer that may be considered as an attempt to influence to obtain unlawful advantage. In case of doubt the situation must be communicated, by written message, to the collaborator's responsible. The offer must be refused if the monetary value offered is disproportioned or if someone's intentions are not obvious.
- Respect, in its relationship with employees and public entities, for the exemption duties to which they are subjected to, withdrawing from offering any type of benefit that does not apply to them.

## Transparency

All ERT collaborators must take acknowledgement of the existence of any situation pertaining to the organization which disclosure is susceptible of causing negative impacts of economic, social, and environmental nature.

They compromise to report and sustain their decisions e professional behaviours, guaranteed by professional secrecy obligation.

## Relationships with Stakeholders

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ERT recognizes the importance of interests' conciliation between the company and its stakeholders and, as such, adopts a collaborative attitude towards them. This posture is manifested through the acceptance of the stakeholder's rights to be heard, to be respected, to demonstrate their legitimate concerns and to converge with their expectations.

ERT provides its stakeholders real-time information about the challenges that arise linked to human rights principles fulfilment.

## Relationships with clients and Suppliers

ERT and respective collaborators will promote, next to its clients and suppliers, the importance of complying with safety practices, granting special attention to precautionary measures.

All ERT collaborators are required to bound their behaviour in an ethical, loyal, and respectful way, promoting urbanity, friendliness, and professional pride in their relationship with clients and suppliers. Equally, they must demonstrate respect towards rights and sensibility, observing and demanding contractual obligations, keeping the relationship within the boundaries of good costumes and deontological commercial practices.

The process of selecting and hiring suppliers must obey to unambiguous criteria, fair and impartial, monitoring not only commercial conditions but also ethical and professional behaviour.

ERT compromises not to establish or maintain relations with clients or suppliers that are not aligned with ERT's principles or values, to sensitize actively its collaborators in referred way and to take adequate and necessary measures every and any time ethical disapproving conducts occur.

## Relationships with Shareholders

The main objective assumed by ERT is to create value to its shareholders, endorsed in performance excellency and business sustainability obtained through the balance between the social, economic, and environmental dimension.

## Relationships with Collaborators

### Interpersonal Relationship

ERT collaborators must observe and obliged to various principles such as loyalty, integrity, cooperation, urbanity and respect for co-workers and hierarchy, guiding their relationships through a respectful, professional, and cordial treatment. A dialogue is ought to be developed, sustained on its own openness and frontality with total respect for opinion divergency.

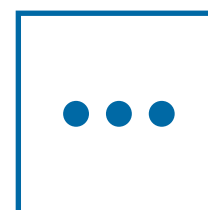
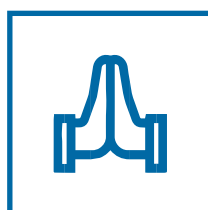
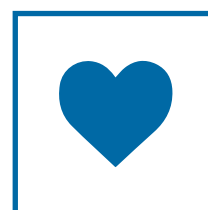
Consequently, all collaborators should:

- Promote the participation of different knowledge and information and encourage cooperation between different teams and sectors, promoting the team-spirit.
- Perform highly in a cooperation and respectful way, promoting a good work environment, acting correctly and urbanely throughout the organization.
- Implement their supervisor’s decisions according to the organization plans and urge their subordinates in its employment.

### Non-Discrimination

Discrimination is the act to treat somebody in an unfair or inequal based on prejudice or individual characteristics.

ERT promotes a work environment in which every individual is treated equally with both respect and dignity. It is a Group that fosters opportunities and does not discriminates its collaborators based on:





## Religion

ERT is compromised with actions and politics that reassure a fair job, including equally of treatment in hiring, promoting, personal development, remuneration and terminating and will not tolerate discrimination towards any person.

### Integrity and Loyalty

It is forbidden, to all ERT collaborators, to use their respective hierarchal position, image or ERT's brand name, towards obtaining personal gain. During their professional roles and concerning both internal and external relationship, all collaborators must embrace a dignified and suitable behaviour, upholding ERT's Group prestige.

### Gifts and Commercial Offers

ERT does not encourage the practice of boon or the acceptance of gifts and commercial offers. ERT's collaborators must not accept, for own benefit, goods, services or any other kind of advantages whose value exceeds 50€ (including Christmas Presents) from clients, suppliers, service providers or any other entity, individual or collective that has had or purposes to have commercial relationships with ERT.

The above condition does not apply to offers or payments of goods and services, such as visits, meals, accommodation or displays that may assigned to the collaborator as a consequence of its own professional role, within the scope of it or in ERT's interest. These exceptions must be transmitted to the collaborator's supervisor as soon as possible.

The offering of goods performed by an ERT's collaborator towards any external entity is only applicable when, cumulatively, such presenting is made under ERT'S representation, related to the organization activity and correspondent to the sector's good practice. It also must be approved by the collaborator's supervisor.

It is expressly prohibited the offer or reception, under any circumstance and regardless of value, of money, check, ad any other goods that may be subjected to legal restrictions.

### Harassment

Religion

Disability

Any other status  
legally predicted /

protected

It is an undesirable behaviour, performed with some level of reiteration and aims to affect a person's dignity or to create and intimidating, hostile, degrading, humiliating and destabilized working environment. It holds some characteristics such as:

- Sexual harassment.
- Moral harassment.
- Offensive language or puns.
- Racist, ethnical, gender or religious slurs.

- Depreciating commentaries.
- Intimidating or threatening behaviour.
- Express hostility towards others due to individual characteristics.

ERT pursues a working environment free of harassment or any other type of offensive and disrespectful conduct and will not tolerate any harassment perpetrated by any Collaborator, Client or Supplier.

Any ERT Collaborator cannot ever act in an intrusive manner or cause any type of discomfort to his co-workers. It is important to remind that harassment is determined by someone's actions and the consequence that referred actions have upon others, regardless of one's intentions. Therefore, our code forbids any type of harassment within workplace.

## Sexual Harassment

Sexual Harassment is illegal and ERT Collaborators are strictly forbidden of taking part in any behaviour of sexual harassment.

Sexual Harassment translates as an undesired sexual behaviour, either visual, verbal or physical and can include (although not limited to), unwanted sexual development, sexual favours or request do dates not appreciated, suggestive or undesired contact, explicit sexual language, sexual jokes, written text messages or emails, suggestions, explicit sexual comments regarding appearance, insinuations, suggestive looks or exhibit of sexual suggestive or pornographic content.

## Moral Harassment

It is an undesirable behaviour, performed with some level of reiteration and aims to affect a person's dignity or to create and intimidating, hostile, degrading, humiliating and destabilized working environment. It may include verbal attacks with offensive and humiliating nature, physical or more subtle ones, which can entail physical or psychological violence targeting to reduce that person's self-esteem.

It is considered moral harassment, among others, any of the following acts:

- To promote social distancing between colleagues or subordinated.
- To ridicule, direct or indirectly, any physical or psychological trait inherent.
- To ridicule, direct or indirectly, any physical or psychological trait inherent.
- Made recurrent threats.
- To despise, ignore or humiliate colleagues or co-workers, enforcing their seclusion from other colleagues or superiors.
- Systematically disperse rumours, harsh comments or critics directed to co-workers, supervisors, or subordinates.
- Steadily comment about one's personal life and insinuate that such individual has mental or familiar problems.
- Frequently jest about offensive content.

If anyone is subjected to discrimination or harassment, such person must immediately report the situation.

It should be noted that exercising legitim hierarchical or disciplinary power, within referred limits and within the organization premises, does not constitute any kind harassment.

## Health and Safety

ERT is committed to provide a safe and healthy working environment in conformity with laws, rules, and regulations. All ERT collaborators must be aware of internal politics and safety matters that concern their workstations, other collaborators, and the community as one. All collaborators, by acknowledging any circumstances that may affect either health or safety of their workspaces or community must act conformably, acting immediately to solve such situation or to communicate to their respective hierarchy.

## Substance Abuse

ERT is committed to provide a safe and healthy working environment, free of substance abuse. It is expected that all collaborators perform their function with responsibility and professionally avoiding, to the most of one's possibilities, being under drug or alcohol effect. For safety and health reasons, if one Collaborator observes or suspects that someone is working under one of these substances, such information must be instantly transmitted to appointed supervisor.

## Duty to Develop

All ERT collaborators assume to continuously seek knowledge improvement, withdrawing most of the training opportunities presented to them and recommender by the organization, aiming to develop their competences and to improve performance in their functions.

## Innovation and Initiative

To achieve the collective goals, a proactive compromised individual attitude should be adopted, implementing innovative solutions that surpass the value created by traditional solutions.

## Wage Payment

ERT is responsible of assuring that the payed wages match either the legal contract or the collective negotiation, whichever is highest. Regardless of such condition, each salary must assure the satisfaction for themselves and their respective family basic needs and or any other individual that may be considered of reasonable need. ERT, its suppliers and subcontractors should not proceed to retentions and / or wage deductions without any motive unpredicted on the labour legislation or without expressive authorization from the respective worker.

ERT, as well as its suppliers and subcontractors should provide to all workers: written, detailed and understandable information during the recruitment process regarding their salary; guarantees concerning the payment of their wages and other benefits or subsidies without delay and ensuing applicable laws. All payments should adopt the methodology that most beneficiates the collaborator.

## Relationship with Rivals

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Both ERT and its collaborators respect legal obligations and market criteria, promoting a healthy and loyal rivalry, obeying the anti-rivalry legislation as well as intellectual property rights. The relationship with competitors complies with cordiality and mutually respect.

## Relationships with the Community

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ERT contains actively politics concerning social responsibilities and contributes to enhance those communities in which their businesses are established, demonstrating strong environmental concerns, economic and social wellbeing, and human knowledge development.

ERT aims to keep an open dialogue with the diversity of entities that constitute the community since such dialogue is fundamental for long term success. The existence of communication channels throughout the community helps to easily identify those aspects that demonstrate a need to improve.

ERT compromises to act respecting the principle of precaution when their activities can result in irreversible and serious damage to human life or health, to the environment; conducting continuously measures to avoid or lessen such risks.

## Final Dispositions

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### **Application and Accompaniment**

This Code of Ethics applies immediately after its approval from the Administration Council.

In case of doubt, all collaborators must contact their respective hierarchy supervisor.

### **Compliance of Commitment**

All ERT collaborators must subscribe to the knowledge of referred document, assuming to have knowledge and to behave according to such Code.

### **Non-Compliance**

Those collaborators that do not comply with this Code are subjected to disciplinary action according to the reglementary terms applicable to the conducted violations.

All suppliers and service providers to whom the Code is applicable are subjected to sanctions legally predicted or derived from evaluation and qualification procedures presented in ERT.

## Non-Retaliation Compromise

Any retaliation against ERT's goodwill will not be tolerated. If any complain is made regarding any legal violation, rule, regulation, internal policy, or this exact Code, ERT will act accordingly.

Every complaint will be investigated and approached according to its nature. If any collaborator perceives himself as a victim of retaliation, such fact must be immediately exposed.

## How ERT responds to an inappropriate conduct

It is expected that each one of ERT's cooperates to guarantee that violations of this code are promptly aborted. We uninterruptedly aim to protect the confidentiality of those who expose possible unappropriated conducts, applying the highest legal penalty correspondent to such situation.

Accordingly to the applicable law, anytime that ERT acknowledges any alleged situation of the violation of this Code, it will proceed to a disciplinary process, which may culminate in a disciplinary sanction to the offender when such behaviour is considered as a violation of such Code. All hierarchical chiefs, by force or accordingly to their attributions, may be equally subjected to referred disciplinary action for not having adequately controlled any unappropriated conduct performed by their collaborators.

ERTs response to this code violations depends on multiple factors, including if an individual's behaviour consists in an illegal conduct. Any truly statement or, inversely, the absent of expressing all information regarding a situation will be entirely considered when evaluating a possible misconduct.

**Some violations presented in this Code may also constitute legal violations and can lead to criminal procedures and, in case of convictions, penalties and / or prison.**

## Communication of Irregularities

Communication regarding eventual irregularities or infractions of this Code of Ethics must be forwarded, using written language in paper or digital support (electronic address with restricted access: [etica@ertgrupo.com](mailto:etica@ertgrupo.com)), to the president of the Administration Board by any ERT collaborator, Client, Supplier or any other identity directly related.

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João Brandão  
CEO

