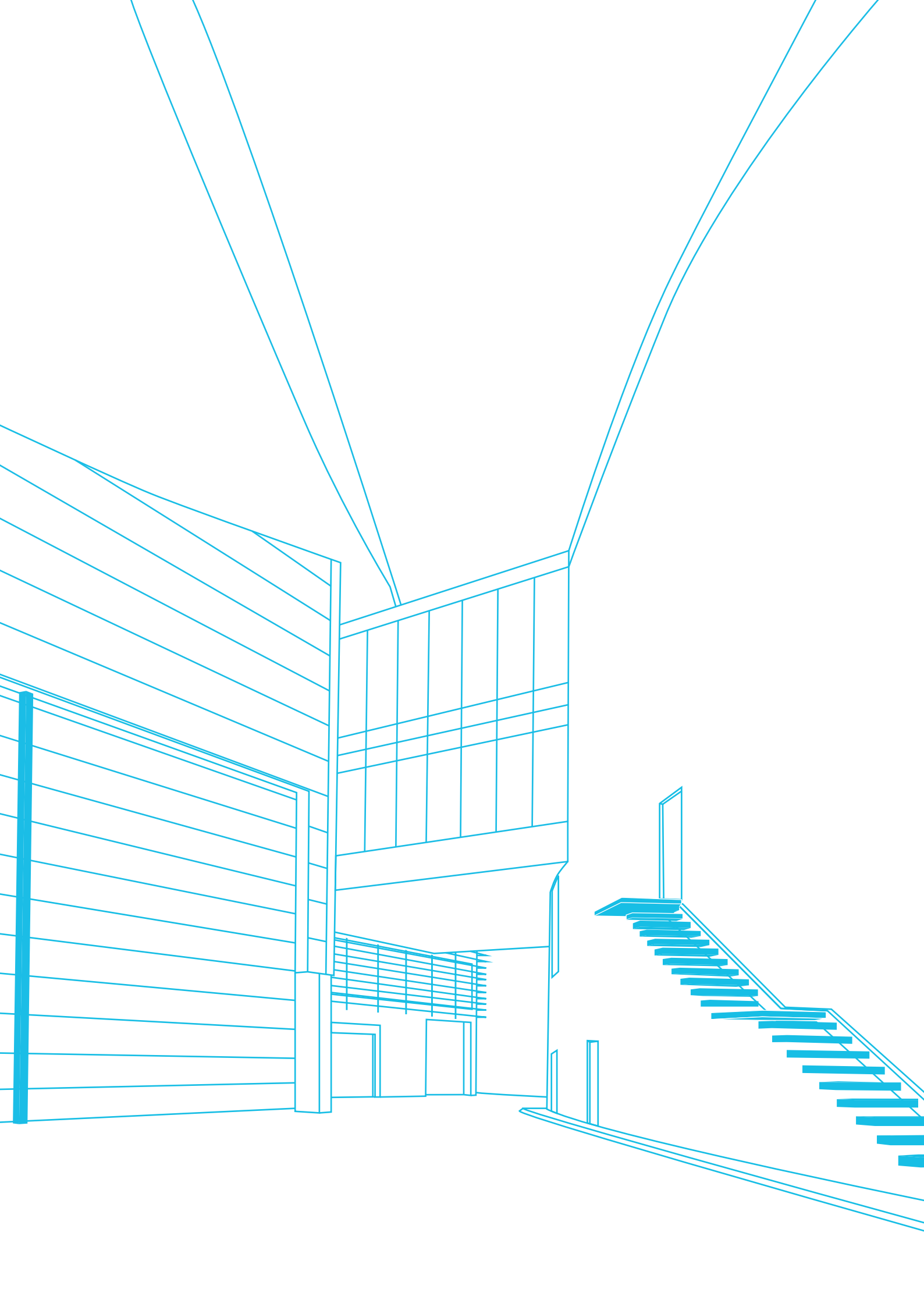


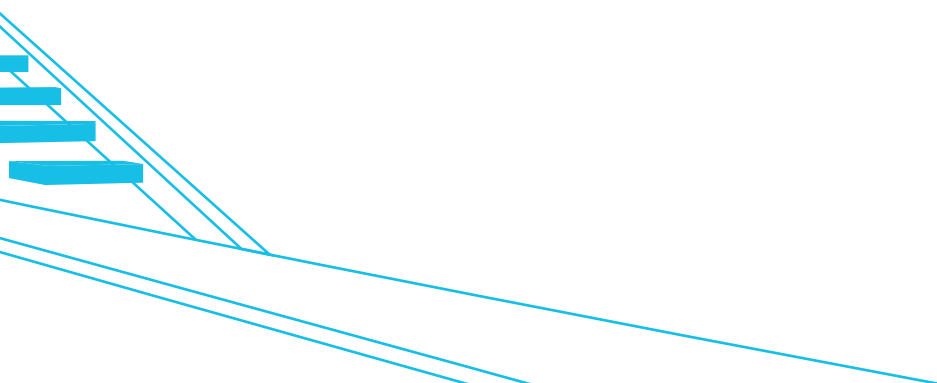
CODE of ETHICS and CONDUCT





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Message from the Board of Directors

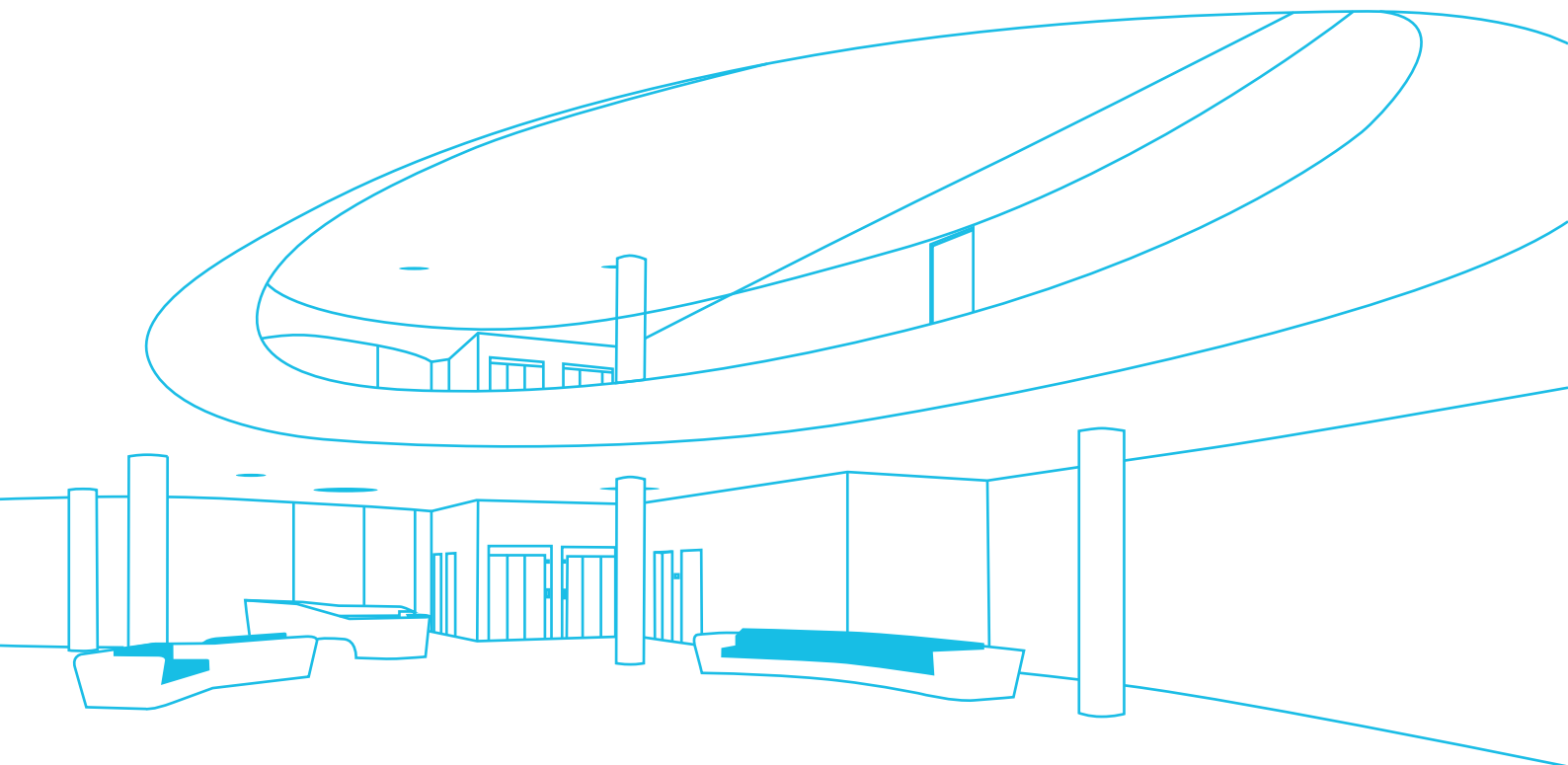
This Code of Ethics and Conduct intends to be a reference to the behaviour of all who work at CEiiA, as well as everyone who interacts with us.

We know that the behavior of the Organization is the result of the actions of every one of us, and that these are the actions that will enable CEiiA to fulfill its mission. As such, we are responsible for reflecting the values and principles presented in the code on our own actions. We are also responsible for acting upon any situation which is not compliant with the code. This code serves also as a reference to the outside community by stating CEiiA's integrity standards in its relation with customers, suppliers and partners. Thus, it encourages the creation of a climate of trust in the interactions between CEiiA and all other external entities.

Board of Directors

MISSION

CEiiA's mission is to establish Portugal as a reference within the mobility industries, particularly in the development of technologies, products and systems, conceived, industrialized and operated from Portugal to the world.



VALUES

CEiiA values represent the principles by which our Institution establishes its activity, the relationship of Employees and Corporate Bodies, CEiiA and the interested parties.



Rigor

We are demanding with ourselves and with our results



Audacity

We challenge and provide constructive criticism to what has been previously defined



Connectivity

Each one of us and we in particular, are part of a whole who evolves through interaction sharing



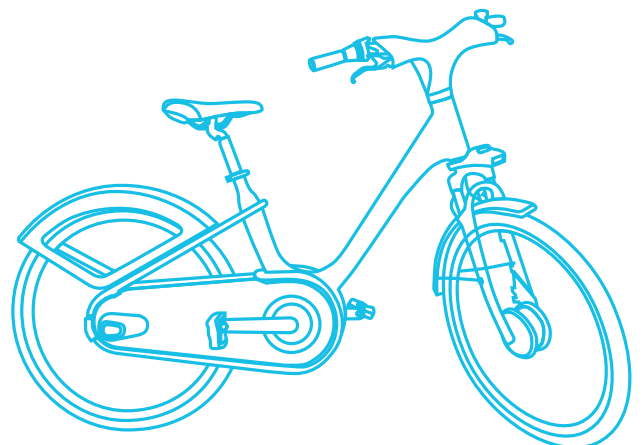
Integrity

Our philosophy of work is based on Transparency of Processes, co-responsibility and respect for people



Creativity

We push the boundaries of what we know, "engineering" the Creativity

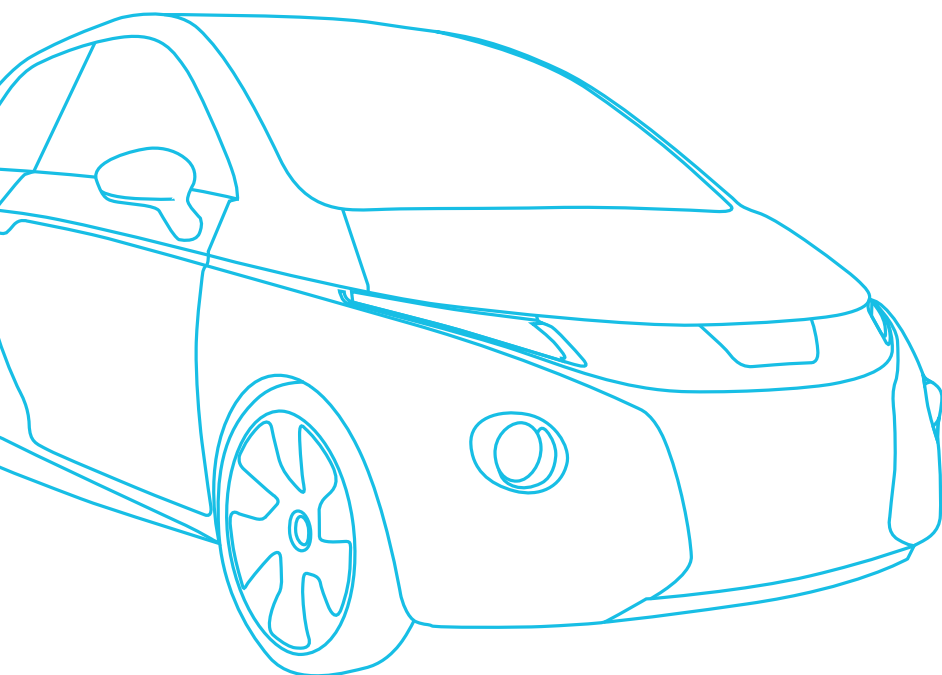


SCOPE

CEiiA's Code of Ethics and Conduct integrates a set of principles governing its activity and a set of rules of ethical and deontological nature to be observed by all employees, being understood as such the members of the respective corporate bodies and other leaders, staff and any person who provides with permanent or occasional service.

This Code was created with the fundamental objective to promote and encouraged the adoption of the acting principles and behavioral rules.

The rules contained in this Code must be accepted, understood and practiced by all Employees wherever they work, regardless of their hierarchical position or their specific duties and responsibilities.



CEiiA's ENGAGEMENT

Personal Development and Professional Progression

CEiiA attributes a great deal of importance to its employees' professional and personal development, promoting continuous training as a driving force for better performance and motivation. The Company's selection, remuneration and career advancement policies are guided by merit and market benchmark practices.

Protection of Individual Rights

CEiiA complies with the principles and values defined in national and international legislation relating to Human and Social Rights. Discriminatory conduct based on gender, race, ethnic group, religious beliefs, political party affiliation or any other consideration is not permitted. Equal opportunities are promoted and integrity and dignity in the workplace are assured.

Health and Safety

CEiiA provides a healthy, safe and pleasant work environment, and promotes well-being and productivity amongst its employees.

Environment

CEiiA and its employees should be committed to protect the environment so that their activities promote sustainable development with respect for the environment with a vision of long-term value creation.

Sustainability

CEiiA is committed to adopt the concept of sustainability in the decision-making process. This behavior should be reflected in the day-to-day practices of CEiiA's management and employees regarding supplier selection criteria and the technical solutions proposed by CEiiA in the projects development.

CEiiA and EMPLOYEES

Training

Professional development and career should be based solely on their merit. In this sense, CEiiA must provide their employees with conditions that contribute to the improvement and upgrading of their professional and personal capacities.

Innovation and Initiative

To achieve collective goals, employees should adopt a committed and proactive attitude, implementing innovative solutions where they exceed the value created if traditional solutions were applied.

Interpersonal relationships

The relationship between all employees and Governing Bodies must be guided by mutual respect, loyalty, cooperation, honesty and clear communication, in the collective pursuit of excellent results.

Integrity and Loyalty

CEiiA's employees must, always assume an honest and dedicated behavior and respect their commitments to other colleagues, superiors and their own institution, committed to safeguard its prestige, professionalism and credibility and always acting in accordance with the law.



ETHICAL PRINCIPLELS

Responsibility

CEiiA's employees should carry out their duties in a responsible, efficient and professional manner.

Confidentiality

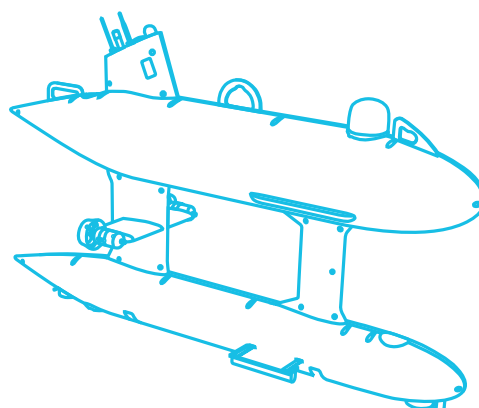
CEiiA's employees are bound to observe professional secrecy, particularly in matters that, by their nature, internal decision or legal imperative, so require, even after ending the performance of their duties or collaboration with CEiiA

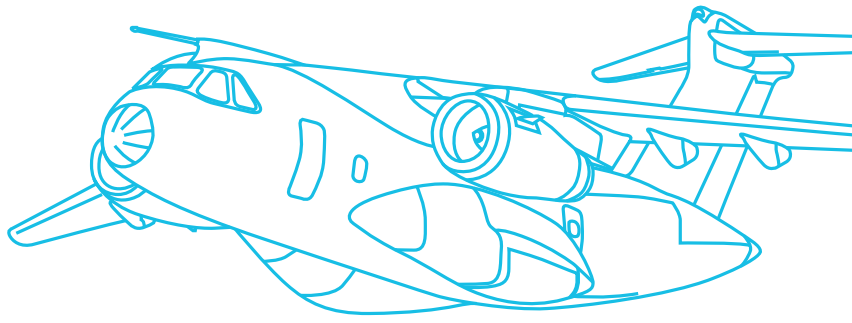
Privileged Information

Employees should use with discretion any information, facts or any other matter within their knowledge or following the exercise of their duties, and respect the existing internal rules of confidentiality and information flow, as well as CEiiA industrial and intellectual property, even after ending their collaboration with CEiiA.

Public statements

All employees should communicate to their superiors any questions requested by people linked to the media, and refrain from doing any public statements or publicly expressing their personal views on matters related to CEiiA activity, without being expressly authorized by the board has well as presentations of communication at conferences, meetings or seminars.





Protection of CEiiA's Assets

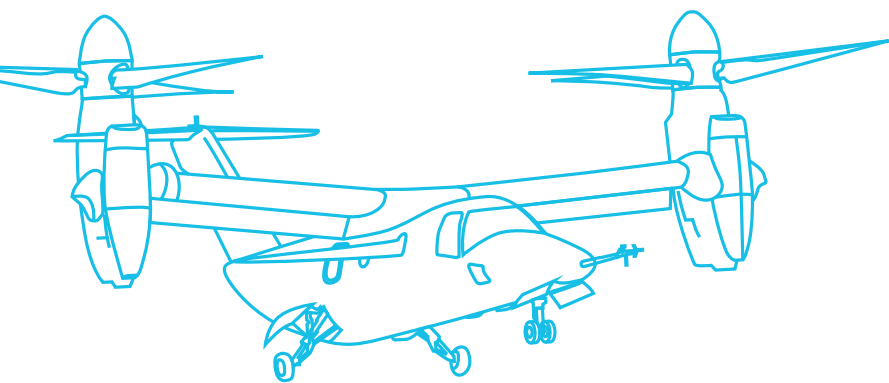
All employees must ensure that CEiiA's physical, financial and intellectual assets are protected and preserved, ensuring that resources are always used efficiently. Whenever possible and recommended, those intellectual assets should be protected by registering and establishing patents.

Employees must act in accordance with the safety guidelines, to prevent accidents and not jeopardize CEiiA's assets. Employees must protect CEiiA's financial resources with diligence, preventing their loss, theft or misuse.

Conflicts of interest

Employees cannot perform any activities outside the institution that jeopardize the fulfillment of their duties at CEiiA without being previously authorized by the Board of Directors.

It is the Institution's Policy that all employees act with good faith and in CEiiA's best interest. For this purpose, employees should not place themselves or place CEiiA in a position that creates the appearance of a conflict of interest.



Unlawful offers

Under the terms and for the purposes of the Law N. 20/2008, of April 21, CEIIA's employees are strictly forbidden to, by itself or through an intermediary, with their consent or ratification, either personally or in the name of the institution, solicit or accept offers, payments, gifts and entertainment or any pecuniary benefits not due to them, by public or private entities, that may violate any laws or affect the professional judgment in the performance of their function. With the same purpose, the employees may not accept benefits offered, directly or indirectly, by other parties who have or intend to have relationships with CEIIA and can configure a favoritism attempt.

Employees must notify the Board for any situation that could reasonably constitute a violation of the laws or the fundamental principles of the institution.

Respect

Employees must maintain and cultivate a correct relationship and cordial conduct among themselves to develop a strong spirit of cooperation and cohesion, using all their capacities to carry out the actions entrusted to them and using loyalty to the institution and the remaining employees.

Application and Follow-up of the Code of Ethics and Conduct

In the first day at work each Employee signs a declaration certifying that he or she is aware of the Code and committed to its compliance.

Any question related to the interpretation or application of this Code must be reported to the Legal and Compliance Department, through the email address djc@ceiia.com.

The Legal and Compliance department have the responsibility, to ensure the monitoring and observance of the code of ethics and conduct, as well as its promotion and dissemination.

