



CODE OF ETHICS AND BUSINESS CONDUCT



INDÚSTRIA DE CALÇADO CELITA, LDA

Guimarães, April 17th 2019

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1. Identification of the Organization/Company

ORGANIZATION

Social Designation Indústria de Calçado Celita, Lda.

Address Rua Cidade de Guimarães, São Torcato 187, 4800-858 - GMR

Activity Manufacture of Footwear

2. Preamble

The current ethics code and business conduct results from the involvement and contributions of the employees of Indústria de Calçado Celita, Lda, henceforth named by AMBITIOUS, and materializes a set of principles and standards of behavior, based on organizational values, with the purpose of inspiring, influencing and guiding the performance of those who carry out their activity, within the scope of the execution of their mission.

This document aims to inform all the stakeholders of AMBITIOUS the values and principles that guide the action of AMBITIOUS and also to clarify all the rules of conduct that should guide the exercise of their professional life, obtaining an individual and collective commitment.

AMBITIOUS, aware of its role, considers important to put ethics and conduct rules as a priority of its strategy and intervention. This document focuses on ethical principles and rules of behavior, relationships and action, reflecting values, principles and organizational culture. It is intended that each of us make a commitment to comply with the principles and norms, with a view to self-responsibility.

This code corresponds to a letter of moral rights and duties, through which AMBITIOUS defines its own ethical, social and environmental responsibilities, internal and external, and constitutes a guide of conduct which aims to consolidate the organizational image in terms of responsibility, transparency, independence and accuracy.

In this sense, AMBITIOUS assumes that only through an ethical and socially responsible conduct it can be possible to contribute to social strengthening and to a truly sustainable development.

3. Scope of Application

The Code of Ethics and Business Conduct applies to all employees who perform functions at AMBITIOUS, regardless the employment contract or hierarchical position, and must observe the principles and norms contained therein in the scope of their professional activity.

All workers must therefore identify themselves with the code and commit themselves to their observance, guiding their behavior by ethically sustained behavior, not neglecting the impact that their decisions, forms of acting and behavior, by action or omission, may have on all those involved.

This code also aims to contribute to the reinforcement of the organizational culture, promoting a policy of social responsibility through the setting, in an objective and clear way, of rigorous ethical behavior accepted and practiced by all parties involved.

Its proper application depends, above all, on the professionalism, awareness and capacity of discernment of AMBITIOUS workers, in particular those in positions of leading positions, coordination or leadership, who should have an exemplary role in the application and promotion of the principles and values established in the code and which, in addition to being linked to the principles of the code, must play a crucial role in promoting and disseminating the ethical culture of the organization.

This instrument is complementary to the promotion of the values and legal norms applicable to the field of activity and the international declarations of Human Rights, as well as other norms and / or internal policies ruling AMBITIOUS.

The adoption of this Code of Ethics and Conduct is one of the pillars for the prevention and mitigation of error and fraud risk, with the aim of promoting a proactive, structured and prevention-oriented approach to fraud risk management through adoption of a set of proportional and objective measures.

4. Relationship with Stakeholders

4.1. Contributors

- SHARING KNOWLEDGE AND PERSONAL DEVELOPMENT

AMBITION places high value on the professional and personal development of its employees and promotes the constant renewal of ideas and knowledge. Employees should take advantage of all the opportunities presented to them in order to achieve personal and professional development. It is AMBITIOUS's goal to provide them with the necessary training and support in order to reach their full potential, maximizing their capabilities and motivation.

- INNOVATION AND INITIATIVE

New ideas are actively encouraged as a means to get innovative and more effective ways to achieve business goals.

- RESPECT, RESPONSABILIZATION AND COOPERATION

Relations with employees are based on respect for the individual. It is expected that the relationship between employees is based on mutual respect, education and justice, and that they adopt principles of cooperation, teamwork and accountability in the pursuit of excellence and self- fulfillment.

- CONFIDENTIALITY AND RESPONSIBILITY

Employees are obliged to protect the confidentiality of the business information to which they have access, namely to AMBITIOUS, its customers and suppliers, and must not use any kind of internal knowledge to obtain personal benefits. Employees are required to protect society's assets through sensible and rational use of resources.

- SUSTAINABILITY

Sustainability is seen as a duty shared by all employees and each manager is responsible for ensuring that the same is carried out on his team.

- CONFLICT OF INTERESTS

Involvement in activities that may compete with AMBITIOUS activities should be avoided and, in case of a potential conflict of interests, employees should immediately communicate in writing to their superior and the human resources department

- HEALTH AND SAFETY

AMBITIOUS aims to provide a healthy and safe working environment for all employees.

- SOCIAL AWARENESS

AMBITIOUS adopts global principles defined under international law and international declarations of Human Rights. No discriminatory behavior is tolerated and equal opportunities for all are promoted, as is the right to moral integrity and dignity in the workplace.

- COMPLIANCE

Such compliance with the rules contained in this code and applicable laws by all employees is expected. Failure to comply may have disciplinary consequences, as provided by law.

4.2. Relationship with Governments and Local Communities

- ETHICAL BEHAVIOR

AMBITIOUS is obliged to comply with all national and international laws in force. The code will be reviewed regularly and, where necessary, updated to incorporate all relevant changes in legislation and any new issues or issues that are deemed to merit attention and guidance in terms of business behavior.

- SOCIAL AWARENESS

The concerns of the community in which AMBITIOUS is active should be taken into account, including national and local interests, and support should be given to the community.

- FISCAL GUIDELINE

AMBITIOUS complies with all its tax obligations, recording and declaring all transactions performed.

- ENVIRONMENTAL AWARENESS

AMBITIOUS is committed to conserving the environment and recognizes that resources must be used responsibly.

4.3. Relationship with Business Partners

- CUSTOMERS FOCUS

The activity of AMBITIOUS should be oriented to the needs of the market and consequently of its customers, always looking for their satisfaction, providing them a product according to their expectations, through simple interactions and increasing ease and convenience for the client.

- INTEGRITY

AMBITIOUS believes that in the relationships it establishes with its business partners, acting with integrity is a prerequisite for a long-term success relationship. Employees are expected to act with integrity, honesty, and transparency. No restrictive business practices or abuse of any dominant market position is permitted.

- ETHICAL BEHAVIOR

Gifts or other reduced value benefits may be accepted or offered if deemed to be in accordance with local business practices. However, if the nature or value of the present is excessive and may influence the outcome of a business decision, it should be refused or avoided. If an employee receives a gift, regardless of its value, he / she must communicate this fact to his / her superior and to the human resources department.

- TRANSPARENCY

Business decisions must be made on the basis of rational criteria such as quality and competitive prices. AMBITIOUS is a defender of transparent and fair business practices and does not tolerate any active or passive form of bribery or corruption.

No employee may, individually or jointly with third parties, engage in any act that violates national or foreign laws relating to money laundering, such as converting, transferring, assisting or facilitating any transaction for the conversion or transfer of benefits

obtained by him or herself. third parties, directly or indirectly in order to conceal their origin.

4.4. Relationship with Competitors

- OBSERVANCE OF COMPETITION LAWS

All employees must promote legal competition and are required to comply with applicable local and international competition laws.

- ETHICAL BEHAVIOR

AMBITIOUS can not unjustifiably prejudice the reputation of any competitor, either directly or through insinuations.

5. Report Contacts

The clarification of doubts or expressions of concern related to this code shall be communicated in writing addressed to the human resources department through:

Email: agostinho@ambitious-shoes.com

Address: Rua Cidade de Guimarães, N° 187, São Torcato, 4800-858 Guimarães

Guimarães, April 17th 2019

Approved

Administration,
