

ANTI-CORRUPTION POLICY

1. Summary of the Policy

The objective of this Policy is to determine the necessary measures to prevent, detect and sanction fraudulent acts and the use of the functions and resources of "Mondragon Assembly", S.Coop. de Aretxabaleta-Gipuzkoa (hereinafter, MA), by its workers, managers or members of the administrative bodies, for their own benefit or that of MA or the MA Group.

2. Scope

This Policy applies to all working partners and any other person working under contract for or on behalf of MA. It refers to individual and/or joint actions performed by or on behalf of any one from MA, including actions involving another company from the MA Group.

This Policy shall include all the activities, processes and relationships established by MA and its workers (both associates and independent contractors), at all levels, whether formally written under an agreement, policy, procedure or a similar instrument, or are applicable by custom or usual practice.

3. General rules of behaviour

Any action with financial implications (gifts, payments for travel, payments for hotels, commissions, etc.) that takes place between MA and a third party (person, organisation, institution, etc.) must be clearly and strictly linked to the working relationship (negotiations, project monitoring, exhibitions, etc.) and its provision must be in the spirit of collaboration and courtesy, never with any other intentions that, in the cultural and legal context in which it occurs, might be considered inappropriate.

It is forbidden for all MA workers, as well as any person or entity working on their behalf, to offer, promise or perform, directly or indirectly, payments in cash or through any valuable goods to third parties, illegally, whether they are **natural persons or legal entities, domestic or foreign**, in order to obtain or retain any type of business, favour, or interest. Any decision to favour MA with preferential conditions, or to provide confidential, private information that may give MA a dishonest advantage, is included in this prohibition.

The MA workers, as well as any person or entity working on their behalf, shall not offer, make, promise or authorise the payment of any sum of money or valuable assets, directly or indirectly, to any **individual, government official, political party, representative, member or candidate of a political party or office**, for the purpose of providing, obtaining or retaining any business, favour, interest or dishonest advantage to MA, or for the purpose of:

- Influencing any act or decision of the recipient in the exercise of their work.
- Inducing the recipient to act or to stop acting in any way that involves a violation of the legal duties of the latter.
- Inducing the recipient to use their influence in the local, autonomous, state, European, or government administration, or in a public company, with the purpose of changing or influencing any act or decision by these entities.

4. Control mechanisms for corruption prevention

- All expenses incurred in the name or on behalf of MA shall be duly documented by means of invoices or proof of payment. These expenses shall be reviewed by the accounting department to verify its correct documentation and reasonableness in accordance with the expense policy.
- Payments shall be made against an invoice sent to MA. This rule shall be especially applicable to the expenses relating to travel, stay, meals, representation, etc. Exceptionally, and in case of unforeseen situations that require the use of customised payment methods, payment by invoice and proof of payment shall be strictly justified.

- All expenses shall be recorded in the accounting of MA, with the degree of detail required by the applicable regulations, their supporting documentation must be maintained for the legal period established.
- No payments shall be made to streamline administrative procedures, or to obtain permits, licenses, authorisations, or similar documents.

- All **donations** made shall require the authorisation of the Governing Council (governing body), granted in favour of renowned entities with an organisational structure, ensuring the proper administration of resources their faithful inclusion in the records and accounting books. They shall not be used as a means to cover an undue payment or bribe. MA shall refrain from making donations in favour of political parties or their representatives.
- All **sponsorships** shall require the approval of the Governing Council (governing body) and be properly documented. The activities that are sponsored shall be consistent with the principles of social responsibility that guide MA.

To comply with this Policy and the anti-corruption laws, MA shall create and maintain the books, records and accounts of its activity, in a regime of absolute transparency, subject to the scrutiny of the Conduct, Social Responsibility and Compliance Committee and the external auditors.

Failure to comply with the Policy

Any incident or query related to this policy shall be communicated directly to any member of the Conduct, Social Responsibility and Compliance Committee or through the email address:

gestionetica@mondragon-assembly.com

Approved by the Governing Council on 22/05/2018