

PRIVACY AND CONFIDENTIALITY POLICY

1. Summary of the Policy

The objective of this Policy is to establish the requirements under which each of the members of Mondragon Assembly, S.Coop. (hereinafter, MA) shall treat the information originated in the scope of the organisation, protecting said information, as well as avoiding any unauthorised disclosure to third parties that may jeopardize compliance with the company's objectives.

The following shall be considered **confidential information**:

- Internal information explicitly declared as confidential and that belonging to third parties and delivered to MA under a confidentiality agreement.
- Data relating to workers, cooperatives, suppliers and other third parties related to MA that have not been publicly disseminated by MA or the owners of said data.
- Documentation related to the activities of the different MA areas that has not been publicly disseminated by them.

2. Scope

This Policy is applicable to all MA workers and refers to individual and/or joint actions performed by or on behalf of the company.

This Policy shall include all the activities, processes and relationships established by MA and its workers, 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

Duty of discretion, secrecy and confidentiality

The dissemination of confidential information, either intentionally or accidentally, may cause serious damage to the image of MA and in relations with workers and third parties related thereto. Therefore, in order to ensure that the information is used with the necessary degree of secrecy and confidentiality, the following guidelines are established:

- All workers shall comply with the duty of discretion, secrecy and confidentiality in relation to the Confidential Information made available to them for the exercise of the tasks inherent in their work or those corresponding to their participation in the different committees or existing groups at MA.
- The information shall be used for legitimate purposes and in an honest and responsible manner and shall comply with the provisions of the Organic Act on Data Protection and other regulations that ensure the confidentiality of information.
- Compliance with the duty of confidentiality shall be ensured, as provided in the agreements signed with different customers, cooperatives, suppliers, and other third parties related to MA.
- No employee shall, during the term of their corporate/employment relationship, or following the termination thereof, divulge confidential information without the due authorisation of MA.
- The hierarchical superior shall be informed immediately regarding:
 - Any use, dissemination and/or publication of confidential information by other workers.
 - Any attempt made by a third party outside of MA to obtain confidential information from any employee.

4. Mechanisms established to guarantee confidentiality

- Signing of a confidentiality commitment at the time of hiring of a worker by MA. The document shall inform of the duty of secrecy and confidentiality, the kind of information deemed confidential, etc. Signing is mandatory and implies the acceptance of the obligation by the worker.
- Incorporation of a confidentiality clause in agreements signed by MA.
- Signing of a confidentiality document by contractors, subcontractors, consultants, and other external individuals or entities, who have access to private and confidential information on it, in the development of their work.
- Restricted access to the information available on the internal computer network.

Dissemination of information

- The dissemination of confidential information not previously published by the relevant officers of MA shall require the authorisation of the Board.
- The diffusion of printed or digital material produced by MA for any purpose, capture of photographic images or filming of any type in the facilities, as well as any other action that implies the publication of material owned by MA, or including its name, shall require the authorization of the Board.

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 30/10/2017