

ANTI-CORRUPTION POLICY

1. Summary of the Policy

The purpose of this Policy is to determine the measures required to prevent, detect and sanction fraudulent acts and the use of the functions and resources of "Mondragon Assembly", S.Coop. In Aretxabaleta-Gipuzkoa (hereafter, MA), from MA or from the MA Group.

2. Scope

This Policy is applicable to all partner workers and to any other person who works for or on behalf of MA. It refers to individual and/or joint actions performed by or on behalf of anyone in MA, including those involving another MA Group company.

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 economic implications (gifts, payment for travel, hotel payments, 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 follow-ups, trade fairs, etc.) and facilitated in a spirit of collaboration and courtesy, never with other intentions that, in the cultural and legal context in which they occur, could be considered inappropriate.

It is forbidden for any MA worker, as well as any person or entity working on their behalf, to offer, promise or make, directly or indirectly, payments in money or through any valuable goods to third parties, illegally, whether they are **natural persons or legal entities, Spanish 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.

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 political office**, for the purpose of providing, obtaining or retaining any business, favour, interest or dishonest advantage for 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 personalised 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.
- Any **donation** made shall require the authorisation of the Governing Council (governing body), be granted in favour of entities of recognised prestige with an organisational structure that guarantees the proper administration of the resources and be faithfully reflected 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 and Compliance Committee and the external auditors.

Failure to comply with the Policy

Any incident or query related to this policy should be reported directly to any of the members of the "Conduct and Compliance Committee" or by e-mail to:

"gestionetica@mondragon-assembly.com"