

PRIVACY AND CONFIDENTIALITY POLICY

1. Summary of the Policy

The aim of this Policy is to establish the requirements under which each of the members of "Mondragon Assembly, S.Coop."

(hereafter MA), must process the information originating from within the organisation, protecting such information, as well as preventing its unauthorised disclosure to third parties that could jeopardise the fulfilment of the company's objectives.

The following shall **be considered Confidential Information**:

- Internal information explicitly declared confidential and third party information provided 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 by 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 cover all activities, processes and relationships established by MA and its employees, at all levels, whether formally set out in a contract, policy, procedure or similar, or applied by custom or 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 to it. 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 for in the agreements signed with different customers, cooperatives, suppliers, and other third parties related to MA.
- No employee shall, during the term of their partner/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 provide information on the duty of secrecy and confidentiality, the kind of information deemed to be 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 premises, as well as any other action that implies the publication of material owned by MA, or including its name, shall require the authorisation 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 and Compliance Committee or through the email address gestiónética@mondragon-assembly.com

Approved by the Governing Council in January 2020