

ACTION POLICY FOR CONFLICT AND HARASSMENT

1. Summary of the Policy

The purpose of this Policy is to define the system that ensures the appropriate treatment of possible conflicts and harassment or psychological bullying that may occur in the workplace and that affects or is performed by workers of Mondragon Assembly, S.Coop. in Aretxabaleta-Gipuzkoa (hereafter, MA).

2. Scope

This Policy is applicable to all partner workers and to any other person who works for or on behalf of MA and refers to individual and/or joint actions developed based on the employment relationship.

3. Descriptions of conflict and harassment

Situations of conflict and harassment are defined according to the following descriptions:

Conflict:

- Interaction between independent people who perceive an opposition of interests, objectives and/or values and who see the other party as an obstacle to their goals.
- When one of the parties experiences a decline in their right to dignity at work and has difficulty defending themselves in said situation.
- Situations that are isolated, merely occasional or derived from reasonable disagreements in an employment relationship shall not be considered a conflict.

Harassment:

Psychological harassment covers all forms of continued behaviour that is abusive, repeated and prolonged in time, including conduct, words, actions, gestures or repetitive or systematic writings that undermine the personality, dignity or psychological well-being of a person.

It occurs in different ways:

- **Discriminatory Harassment.** It is any verbal, physical or organisational behaviour aimed at discriminating, excluding or isolating one or more workers, based on their racial or ethnic origin, ideology, religion, disability, or sexual orientation.
- **Psychological Bullying.** Exposure in the workplace to behaviours of psychological violence targeted, frequently, repeatedly and over time towards one or more workers by another worker or other workers who act against them from a position of power (not necessarily hierarchical).
- **Sexual Harassment.** Any verbal or physical behaviour of a sexual nature that has the purpose or produces the effect of threatening the dignity of a person, particularly when creating an intimidating, degrading or offensive environment.
- **Gender-Based Harassment.** Any behaviour based on a person's sex with the purpose or effect of threatening their dignity and creating an intimidating, degrading or offensive environment.

4. Modes of action in the event of detecting a possible case of conflict or harassment

- In the event that a worker detects a possible case of conflict or harassment in relation to themselves or another MA person, they shall inform the Conduct, and Compliance Committee.

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Communication may be submitted directly to any of its members or through the following email address:

gestionetica@mondragon-assembly.com

The "Conduct and Compliance Committee" shall ensure the confidentiality of the person making the report.

- The Conduct and Compliance Committee shall implement the handling protocol as described in item 5 of the CRIMINAL RISK PREVENTION MANUAL.

5. Guarantees

- Possible cases shall be treated with total confidentiality. No information of this kind shall be communicated or commented with anyone without the permission of the people involved.
- MA guarantees that the workers who accept this policy, as well as those acting as witnesses, experts or technicians, shall be guaranteed their privacy and shall not be subject to intimidation, persecution, discrimination, or reprisals.
- When a person communicates a complaint regarding the resolution of conflicts, the complainant and the defendant shall have the right to be informed about the resolution of the protocol implemented, as well as the reasons for such resolution, always protecting the confidentiality of information such as medical data, etc.
- When the verification of the reported facts is not possible, in no case shall retaliation be taken against the reporting worker, and the situation shall be supervised with special attention to ensure that the facts reported in the complaint do not occur.
- Measures shall be taken against fraudulent claims that may damage the image of third parties according to item 5 of the CRIMINAL RISK PREVENTION MANUAL.