

MANUAL INTEGRADO DE GESTIÓN - POLITICA

The **management of MONDRAGON ASSEMBLY S.COOP** has established its Management Policy in order to set out the company's intentions and guidelines, and to **ensure** its compliance, in terms of strategy, people, stakeholders, social responsibility, health and safety at work, the environment, criminal compliance and R&D&I management.

POLICY STATEMENT**1.- REGARDING THE GENERAL STRATEGY:**

- **MONDRAGON ASSEMBLY works closely with the customer, seeking closeness and identification, as well as commitment to their real needs in order to attain their satisfaction.**
- **MONDRAGON ASSEMBLY is an organisation based on people and teamwork.**
- **MONDRAGON ASSEMBLY is committed to innovation and development with the promotion of R&D projects and continuous improvement** as ways to guarantee its future competitiveness and provide added value to its customers and society in a sustainable manner.
- **MONDRAGON ASSEMBLY is committed to integrating the management of Quality, Occupational Health, the Environment, Corporate Social Responsibility, Criminal Compliance and the management of R&D&I in all activities of the company and at all levels of the organisation, defining responsibilities and providing the appropriate resources and training so that they can be carried out with a guarantee of success.**
- **MONDRAGON ASSEMBLY integrates Sustainable Development into its decisions at all levels.**
- **MONDRAGON ASSEMBLY has an international vocation and is open to the world and other cultures, always respecting their uniqueness.**

2.- REGARDING THE PEOPLE OF "M.A.":

- **MONDRAGON ASSEMBLY works on a preventive basis to ensure the health, safety and well-being of all employees** by means of safe work systems and equipment, carrying out inspections and risk assessments on a scheduled basis and, whenever the situation makes it advisable, eliminating hazards and reducing risks, with a firm commitment to ensuring and continuously improving its performance in this area of occupational health and safety by defining and planning actions and objectives.
- **MONDRAGON ASSEMBLY actively monitors the health** of its workers and that of collaborating personnel, ensuring their involvement and participation and maintaining clear and fluent communication.
- **MONDRAGON ASSEMBLY undertakes to ensure compliance with the legal requirements concerning health and safety at work and other requirements defined.**

3.- REGARDING STAKEHOLDERS:

- **MONDRAGON ASSEMBLY has channels of communication** with its priority stakeholders to find out what they think, what their demands are and how they value us.
- **MONDRAGON ASSEMBLY respects** their ideas, expectations, and interests. It identifies and evaluates the relevance of issues in relation to these stakeholders, planning actions and evaluating results through continual feedback with them.

4.- REGARDING SOCIAL RESPONSIBILITY:

- **MONDRAGON ASSEMBLY is committed to compliance with the 10 Principles universally accepted and included in The Global Compact :**

- 1 – "Businesses should support and respect the protection of internationally proclaimed human rights within its scope of influence."
- 2 – "Businesses must make sure that they are not complicit in human rights abuses."
- 3 – "Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining."
- 4 – "Businesses should eliminate all forms of forced and compulsory labour."
- 5 – "Businesses should ensure the effective abolition of child labour."
- 6 – "Business must eliminate discrimination in respect of employment and occupation."
- 7 – "Businesses should support a precautionary approach to environmental challenges."
- 8 – "Businesses should undertake initiatives to promote greater environmental responsibility."
- 9 – "Businesses should encourage the development and diffusion of environmentally friendly technologies."
- 10 – "Businesses should work against corruption in all its forms, including extortion and bribery."

- **MONDRAGON ASSEMBLY is committed to respecting the environment**, using non-harmful products and preventing environmental impact and pollution by reducing the generation of waste and consumption of resources.
- **MONDRAGON ASSEMBLY is committed to the environment and to society**, developing social investment initiatives. **At MONDRAGON ASSEMBLY, there is accountability** on the part of senior management.

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- **At MONDRAGON ASSEMBLY, there is a commitment to transparency and regular communication** about the performance of the organisation, aimed at priority stakeholders.
- To summarise its commitment to the general ideas of Social Responsibility presented in the previous points, MONDRAGON ASSEMBLY has a **Code of Conduct** and Policies such as **a guide for the behaviour to be followed** by all the members of its Group.

5.- REGARDING THE PREVENTION AND COMPLIANCE OF CRIMINAL RISKS (Criminal Compliance):

- *The performance of criminal acts is prohibited at Mondragon Assembly.*
- *All members of **MONDRAGON ASSEMBLY** shall comply with the criminal legislation applicable to the organisation.*
- *No one in **MONDRAGON ASSEMBLY** shall be forced to commit a crime or be persecuted or punished in any way for refusing to do so.*
- *The members of **MONDRAGON ASSEMBLY** shall be required to report any suspicious matters or conduct related to criminal risks, with the guarantee that their confidentiality shall be maintained.*

- **MONDRAGON ASSEMBLY** has carried out (and reviews it periodically and when necessary) an assessment of the criminal risks to which it is exposed, based on the activity it conducts, and in order to take the necessary actions to avoid their occurrence or to reduce to the maximum the probability of such occurrence.
- All aspects related to criminal compliance shall be managed (processes, procedures, supervision, reviews, assessments, reports, etc.) by the **Compliance Body**. The Governing Council (governing body) is committed to adopting, implementing, maintaining and continuously improving a criminal compliance system while promoting a culture of compliance at Mondragon Assembly. The **Governing Council** (governing body) grants authority and independence to the **Compliance Body** for the exercise of its duties.

- *Failure to comply with the contents of the criminal laws and the complementary regulations that affect the organisation, as well as the requirements derived from this criminal compliance policy and the system that supports it, may result in penalties, if the violation is proven, in accordance with the provisions of the **Internal Regulations of the Cooperative**.*

- **MONDRAGON ASSEMBLY** is committed to complying with the legislation, the applicable regulations and other requirements to which the organisation subscribes, in terms of quality, occupational health and safety, corporate social responsibility, the environment, criminal compliance and R&D&I

- **MONDRAGON ASSEMBLY** always works on the **continuous improvement** of this IMS, for which it carries out regular audits in all its processes and areas

The **Management of MONDRAGON ASSEMBLY** shall take this Policy into account in all its activities and decisions, when allocating and securing resources, information, design and operation of work processes and systems, introduction of new technologies, acquisition of equipment and facilities, design and supply of products and services, etc. Each year, in the definition of objectives to be met, the provisions of the Management Policy shall be taken into account, and the management's review of the system shall take into account the possible need for changes in the Management Policy. The Policy is disseminated to the collective and is included in the welcome plans for new hires, as well as being available to interested parties.

Aretxabaleta, 17th February 2022



Firma Mikel Gantxegi Gantxegi
DIRECTOR GENERAL