

MA- INTEGRATED MANAGEMENT SYSTEM MANUAL
SUSTAINABILITY POLICY

The management of **MONDRAGÓN ASSEMBLY S.COOP** has established its Sustainability Policy in order to set out the company's intentions and guidelines, and to ensure compliance with them, in terms of the company's strategy and sustainability.

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 and Criminal Compliance 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.
- **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.

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 and wellness** of its workers and that of collaborating personnel, ensuring their involvement and participation and maintaining clear and fluent communication.
- **MONDRAGON ASSEMBLY monitors and works preventively to ensure the health and safety of the users of its product**, by means of operational controls and quality audits based on the standards and regulations in force on machine safety.

3.- 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 the environment and to society**, developing social investment initiatives. **At MONDRAGON ASSEMBLY, there is accountability** on the part of senior management.

MONDRAGON ASSEMBLY is committed to extending a living wage to its workers in order to ensure the income necessary to cover basic needs.

- **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.

4.- REGARDING THE ENVIRONMENT AND CLIMATE CHANGE:

- **MONDRAGON ASSEMBLY is committed to the objectives and goals of sustainable development** of the United Nations, through various actions carried out in the organisation, trying to incorporate these objectives in all the organisation's activities.
- **MONDRAGON ASSEMBLY is committed to the environment** by carrying out appropriate annual Carbon Footprint measurements in all its scopes.
- **By 2025, MONDRAGON ASSEMBLY will have a roadmap** for reducing its Carbon Footprint.
- With the aim of reducing emissions, **MONDRAGON ASSEMBLY is committed to reducing emissions to ZERO in Scope 2**. 100% of electricity consumption will be renewable, whether by purchase or self-generation.
- With the target set for **2030, MONDRAGON ASSEMBLY is committed to being 100% carbon neutral in scopes 1 and 2**, having reduced 42% of absolute emissions in these scopes and 25% of absolute emissions in scope 3.
- **MONDRAGON ASSEMBLY is committed to being 100% neutral in all its scopes by 2050**.
- Furthermore, throughout the whole process, **MONDRAGON ASSEMBLY** will adopt measures to reduce the waste generated, making it 100% reusable and/or recyclable.
- In turn, **MONDRAGON ASSEMBLY** will buy and use products that are not harmful to the environment, these products being environmentally friendly (recycled, reused, etc.).

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

- **MONDRAGON ASSEMBLY** undertakes to ensure compliance with the legal requirements relating to health and safety at work, the environment, product and service quality, criminal compliance, human rights, and gender equality, as well as any other requirements it may define.
- **The commission of criminal acts is prohibited at Mondragón Assembly**, with the scope of all financial and non-financial control management activity necessary to mitigate the criminal risks identified by the organisation, in the development of design and production activities of production systems for automatic 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.

SUSTAINABILITY POLICY

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 considered, 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, 1ST February 2024



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DIRECTOR GENERAL