

# OUR CODE OF ETHICS

## REDUCED VERSION

MONDRAGON Corporate Centre has behavioural guidelines in place to direct the everyday work of its people in relation to the various stakeholders. The code of ethics highlights the following aspects:

***General standards of conduct.***

They revolve around our cooperative values and principles and they emphasise teamwork, service vocation, capacity for response and demanding the best of oneself.

***Legal and regulatory behaviour.***

Which compels compliance with the laws, regulations and internal standards that apply to the organisation and its specific activities.

***Labour relations.***

In order to guarantee a safe working environment for its workers free from risks that may impair their physical and psychological health and safety.

***Conflicts of interest.***

The organisation respects the participation of its workers in other types of activities, provided that they are legal and do not involve unfair competition or conflict with their responsibilities in the Corporate Centre.

***Responsibility concerning the corporate image and reputation.***

People from the Corporate Centre must take the utmost care to protect the corporate image and reputation in all their professional activities.

***Measures to combat bribery and corruption.***

Which reject unethical practices to influence the will of third parties in order to obtain some benefit for the organisation or for themselves.

***Political contributions, sponsorships and participation in other entities.***

These matters are regulated by defining the scope of each one of them.

***Confidential information.***

This affects the discretion, secrecy and confidentiality of any information that is managed by people from the Corporate Centre in the performance of their activities.

***Financial integrity.***

All Corporate Centre transactions, deeds and events shall be reflected clearly and accurately.

And for compliance with all these rules, a series of reference documents has been developed: Policy for Action in the event of Conflict and Harassment, Policy on Prevention of Conflicts of Interest, Anti-corruption Policy, Policy on Subsidies, Privacy and Confidentiality Policy, and Information Security Policy.