

ANTICORRUPTION POLICY

1. Summary of the Policy

The purpose of this Policy is to determine the measures necessary to prevent, detect and penalise fraudulent acts and the use of the functions and means of Fagor Electrónica Koop. E. for economic or other benefit for the workers, managers or members of its management bodies.

2. Scope

This Policy is applicable to all employees, directors and members of the administrative bodies of Fagor Electrónica Koop. E., including inactive partners and collaborating partners. It refers to individual and/or joint actions performed by or on behalf of any of Fagor Electrónica Koop. E.

This Policy shall include all the activities, processes and relationships established by Fagor Electrónica Koop. E. and their workers (both partners and independent contractors) at all levels, whether they are formally established by a contract, policy, procedure or similar means or applied by custom or customary practice.

3. General Requirements

It is forbidden for any worker of Fagor Electrónica Koop. E., as well as any person or entity that works on its behalf or in its representation, to offer, promise or make, directly or indirectly, payments in money or through any valuable asset to third parties, in an illegal manner, whether they are **natural persons or workers of private entities, domestic or foreign**, in order to obtain or retain any type of business, favour, or interest. Any decision to favour Fagor Electrónica Koop. E. with preferential conditions, or to provide any confidential or private information that may give Fagor Electrónica Koop. E. any dishonest advantage, is included in this prohibition.

The workers of Fagor Electrónica Koop. E., as well as any person or entity working on its behalf or representation, shall not offer, make, promise or authorise the payment of any sum of money or valuable asset, directly or indirectly, to any **natural person, government official, political party, representative, member or candidate of a political party or office**, for the purpose of providing, obtaining or retaining any business, favour, interest or dishonest advantage to Fagor Electrónica Koop. E., or in order to:

- Influence any act or decision of the addressee in the exercise of their position.
- Induce the addressee to act or to stop acting in any way that implies a violation of the legal duties of the latter.
- Induce the addressee to use their influence in the local, autonomous, state or European administration, in the Government, or in a public company, in order to alter or influence any act or decision by them.

Measures for prevention of corruption

- All expenses incurred in the name or on behalf of Fagor Electrónica Koop. E. shall be duly documented by invoices or proof of payment. These expenses shall be reviewed and approved always **by a manager or superior of the worker**, and subsequently reviewed by the accounting department. in order to verify their correct documentation and reasonability in accordance with the expenditure policy.
- Payments of a certain amount shall be made with an invoice sent to Fagor Electrónica Koop. E. Exceptionally, and in the case of unforeseen situations requiring the use of customised payment methods, payment by invoice and proof of payment shall be strictly justified.

- All expenses shall be recorded in the accounts of Fagor Electrónica Koop. E., with the degree of detail required by the application regulations, and their supporting documentation shall be preserved for the legal period established.
- No unjustified payments shall be made to expedite administrative procedures or to obtain permits, licenses, authorisations, or others.
- Any kind of invitation to suppliers, customers, and other third parties in the environment of Fagor Electrónica Koop. E. shall have its transparency and adequacy to the law guarantee and shall, thus, require the express authorisation of the worker's hierarchical superior.
- Any **donation** made shall require authorisation of the administrative body, granted in favour of entities of renowned prestige, with an organisational structure that guarantees the correct administration of resources, and be faithfully reflected in the records and accounting books. They shall not be used as a means to conceal an improper payment or bribe. Fagor Electrónica Koop. E. shall refrain from making donations in favour of political parties or their representatives.
- Any **sponsorship** shall be approved by the administrative body or persons to which the body delegates such responsibility and shall be properly documented. The activity or actions to be sponsored should fall into those defined by Fagor Electrónica Koop. E. as preferred, in compliance with the principles and values of Fagor Electrónica Koop. E.

For compliance with this Policy and the anticorruption laws, Fagor Electrónica Koop. E. shall create and maintain the books, records and accounts of its activity in a regime of absolute transparency, carrying out internal controls for its due fulfilment.

It is strictly forbidden to take retaliatory action against any person who communicates in good faith, to the appropriate officials of Fagor Electrónica Koop. E. or to the authorities, the occurrence of these practices in the scope of Fagor Electrónica Koop. E.

Noncompliance with the Policy

Any incident or query related to this policy should be communicated directly to the HR Director or through the email address: kanaletikoa@fagorelectronica.es.