



CIKAUTOXO GROUP

Code of conduct

Revision N.: 4

Date: 23/07/2021

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REVIEW REGISTER TABLE

TABLE RECORD REVIEWS		
REV	DATE	MODIFICATION
0	09/04/2012	First edition.
1	18/02/2014	General review.
2	21/11/2019	General review.
3	03/07/2020	Inclusion anti-competitive policies.
4	23/07/2021	General review.

1. INTRODUCTION

1.1 OBJECTIVE

This Code of Conduct falls within the Compliance Program of Cikautxo Group.

The purpose of this Code is to define and implement in the Cikautxo Group advanced practices in the areas of Corporate Social Responsibility, ensuring at all times compliance with the legislation and regulations in force in all countries in which the Group operates, as well as the Ethical Values and Principles set out in this Code of Conduct. It should also serve as an example and a driving force for all stakeholders involved in the group.

The Cikautxo Group Code of Conduct also aims to:

- a) Establish the Ethical Values and Principles, as well as the guidelines or standards of conduct of the Cikautxo Group that serve as a guide for the performance of people in their professional activity in the Cikautxo Group and in their relations with the rest of the people of Cikautxo Group, as well as with Suppliers, Interested parties, Business Partners, Customers, Public Administrations and the society.
- b) Prevent the commission of criminal behaviors and any unlawful conduct of Persons in the performance of their professional activity, providing a common model of action to achieve appropriate ethical behavior.
- c) Consolidate a business culture that already exists in Cikautxo Group.

Compliance with the clauses of this Code is based on cooperation, trust, respect and confidential treatment of all observations, discussions and communications between third parties and relevant persons designated by Cikautxo Group.

The Cikautxo Group does not tolerate any act contrary to this Code of Conduct. The actual and effective application of the Ethical Values and Principles established in this Code of Conduct shall be ensured, and the Non-Compliances shall be managed by the Compliance Committee through the Ethical Channel.

2. SCOPE

The Code of Conduct applies throughout the Cikautxo Group at GLOBAL level, and, as far as possible, to the activities of the Cikautxo Group in any geographical area, without prejudice to respect for any local legislation that may reinforce the minimum and mandatory requirements described here.

2.1 Persons covered by the Code

All Persons of the Cikautxo Group, including Societies Controlled by Cikautxo, S. Coop., extending as far as possible to other Participating Companies, to Suppliers, stakeholders, Business Partners and Customers.

2.2 Communication of the Code

The communication of this Code of Conduct is addressed to all new workers in the Cikautxo Group through the Induction Plan established for this purpose. For the Personnel integrated at the date of approval of the Code of Conduct, disclosure shall be made through the intranet, portal of persons or specific documentation provided for that purpose. For third parties or interested parties, the disclosure of the Code of Conduct will be made through the web or specific publications. It will be the responsibility of the Management of each Controlled Society to ensure that the Code of Conduct is effectively deployed.

2.3 Employee engagement

All people are required to have knowledge and compliance with the Code of Conduct, as well as behavior according to the Ethical Values and Principles contained therein.

Likewise, the members of the Governing Board, the Governing Council, the Social Council, the Monitoring Committee and the Compliance Committee shall set an example of knowledge and compliance with this Code of Conduct.

2.5 Commitment to suppliers

Compliance with the Code of Conduct is an obligation for suppliers of Cikautxo Group, which reserves the right to terminate any contract with suppliers not complying with this Code of Conduct.

3. IMPLEMENTATION OF THE CODE, COMMUNICATION AND MONITORING

3.1 Entry into force

This code of conduct has been in force since the approval by the Governing Council of Cikautxo, S. Coop., 23/07/2021 and shall remain in force unless expressly agreed to repeal or enter into force of another replacing it.

It provides for the updating, modification and development of this Code of Conduct in accordance with internal and/or external requirements and for subsequent versions.

All breaches of the Code of Conduct and suggestions for improvement should be brought to the attention of the Compliance Committee, which is the body that ensures compliance with the Code of Conduct and its proper application throughout the Cikautxo Group.

Compliance Committee

The Compliance Committee is the body responsible for ensuring that the members of the Cikautxo Group comply with the Code of Conduct.

The Compliance Committee has competence in all the relevant matters of the compliance function, which is why it is responsible for interpreting and resolving doubts about its content. Its interpretative criteria are binding on all its addressees.

In the event of a discrepancy between this Code of Conduct and any Comprehensive Compliance Program, the Code of Conduct shall prevail. Moreover, the interpretation of the Controls will be carried out in accordance with the spirit and purpose of this Code of Conduct.

This Committee elaborates and proposes the content of this Code of Conduct, as well as the set of Implementation Protocols in the event of non-compliance with any point, which once approved by the Governing Council of Cikautxo, S. Coop. is bound by all interested parties with which the Cikautxo Group collaborates.

3.2 Non-compliance and communication to the Ethical Channel

Failure to comply with this Code of Conduct constitutes an infringement and may result in labour or social sanctions, without prejudice to the corresponding administrative or criminal sanctions.

To facilitate compliance with the Code of Conduct, there is an Ethical, Confidential and Internal Channel (complaints will be allowed from outside Cikautxo) through which:

- Any doubts about interpretation or practical application of the Code of Conduct are addressed.
- Possible infringements of this Code are reported.

Any employee belonging to the Cikautxo Group, or any other interested party, who is aware of a proposal for improvement, non-compliance with this Code of Conduct or the Protocols supporting it, shall communicate it to the Ethical Channel.

The concealment of an incident or an infringement related to any point of the Code of Conduct shall not be understood as an action in the interest of Cikautxo Group.

The communication may be made by one of the following means:

- Sending an email to the compliance committee via the ethics channel (or its alternative posted on the Cikautxo webpage)
- Sending a letter or I.0821 form to the attention of the Compliance Committee.
- Subsidiaries may scale in the event of a conflict of interest to the email address ethicchannelckgroup@cikautxo.com

The Communicant will be informed about the progress made with respect to communication to the Ethical Channel.

3.3 Confidentiality of communications and prohibition of retaliation.

The Cikautxo Group guarantees confidentiality about the identity of people who make communications to the Ethical Channel.

All communications and procedures related to this Ethical Channel shall be carried out in compliance with the requirements of the internal subprocess on the protection of personal data. However, the data of the persons who make the communications to the Ethical Channel may be provided to the administrative or judicial authorities to the extent that they are required by them as a result of any procedure arising from the communication.

It shall be prohibited to retaliate with any or any negative consequences to Persons who make a communication. Any retaliation shall be considered a breach of this Code of Conduct.

The prohibition of reprisals shall not prevent the adoption of disciplinary measures, where appropriate, where the internal investigation determines that the communication is false and formulated in bad faith.

3.4 Ethical Channel Procedure

The Compliance Committee shall keep a record of all communications received through the Ethical Channel. These will be registered in the specific Collaboration Area for this purpose, to which only the members of the Compliance Committee will have access.

Upon receipt of a communication, the Compliance Committee shall initiate an internal investigation in order to collect all necessary information and documentation.

If the Compliance Committee considers that the communication is manifestly unsubstantiated or relates to matters outside the Code of Conduct, it shall record in the communications register the receipt and decision not to initiate the investigation. This decision shall not prevent the subsequent initiation of an investigation if further information is received.

In the internal investigation by the Compliance Committee, the Compliance Committee may request any information and documentation it deems appropriate from any areas or business of the Cikautxo Group.

If the communication concerns a person who is a member of the Compliance Committee, the Compliance Committee may not participate in the processing and the rules on Conflict of Interest provided for in Paragraph 5.4 below shall apply.

Any investigation procedure initiated shall conclude with a resolution by the Compliance Committee containing a proposal to be approved by the relevant Administrative Board of the Cikautxo Group. The Proposal shall, where appropriate, lay down the appropriate disciplinary measures in accordance with the labour law applicable to persons in the Cikautxo Group, without prejudice to any administrative or criminal penalties which may also result.

4. OUR PROJECT: VALUES, MISSION AND VISION

4.1 VALUES

The people who make up the Cikautxo Group share the following values:

- People: self-confidence and the promotion of mutual respect. A proactive attitude to change is maintained. Risk-taking is encouraged by encouraging personal initiative. Efforts and contributions are recognised. Training and information are promoted.
- Customer Satisfaction: This is the main priority. That is why the Cikautxo Group exists. Customers' needs will guide strategies.
- Social commitment: The Cikautxo Group contributes to job creation and to the economic and human development of the social environment, respecting environmental conditions.
- Continuous improvement: Cikautxo Group aspires to make, every day, with safety and proper working conditions, the best products, at the lowest cost and in the right time. The Cikautxo Group aims to identify and eliminate any form of waste in processes and operations.
- Cooperation: only through personal involvement and teamwork can the objectives be achieved.
- Excellent work: Both Internal and External Customers need it. This is the only way to achieve the Mission. It measures preparation, professionalism, effort, but above all, responsibility and respect for others. The Cikautxo Group is constantly seeking to learn and implement new and better ways of carrying out the work. All this with integrity and committed to the general objectives of the Cikautxo Group.

4.2 MISSION

The mission of the Cikautxo Group is to build an excellent, first competitive cooperative company, integrated into MONDRAGON, which will contribute to meet the needs of Customers, staff satisfaction and the development of the area.

4.3 VISION

The vision of the Cikautxo Group is to transform its business fabric, improving the competitive position of business and the commitment and cooperative identity of people, managing to be a business group with profitable and sustainable businesses, to generate value-added employment.

5. ETHICAL PRINCIPLES AND GENERAL RULES OF CONDUCT

Full Professional Conduct

The conduct of the people of Cikautxo Group must be based on professionalism and integrity.

- a) Professionalism is the diligent, responsible, prudent and efficient action.
- b) Integrity is the loyal, honest and in good faith, respecting oneself and others in the exercise of professional activity, corresponding to the trust placed in the Person.

Individuals shall apply for themselves and for others the Ethical Values and Principles established in this Code of Conduct, and shall not pursue their professional activity for purposes other than those entrusted to them.

Compliance with existing legislation and respect for international standards

Cikautxo Group will comply with the laws and regulations of the countries where it carries out business.

Individuals shall respect the obligations and commitments of the Cikautxo Group in their contractual relations with third parties, as well as the uses and good practices of the countries in which they engage in their professional activity.

The lack of knowledge of the legislation, the Code of Conduct, the Controls or contracts which bind the Cikautxo Group, as well as the argument that this is a widespread infringement within the Cikautxo Group, will not justify its non-compliance.

Indications or orders contrary to legality, the Code of Conduct, Controls or contracts that bind the Cikautxo Group that may be received in the performance of the professional activity do not discharge responsibility to persons acting according to such indications or orders.

The Directing Persons and those managing or directing Personal Teams shall:

- a) Be the main connoisseurs of legislation, the Code of Conduct, Controls and contracts affecting their respective areas of activity.
- b) [Reference of the conduct of the Cikautxo Group].
- c) Ensure and ensure that the Persons who depend on them receive adequate information and training to enable them to know and comply with the legislation, Code of Conduct, Controls and contracts linked to the Cikautxo Group that affect them.

United Nations Global Compact

The Cikautxo Group is committed to and linked to human rights, labour standards, the environment and the fight against corruption, and in particular the principles underlying the Global Compact to promote Corporate Social Responsibility (RSC). To this end, the Cikautxo Group assumes as its own the principles of the United Nations Global Compact.

Image and Reputation

The Cikautxo Group has a strong reputation thanks to its long experience and a sound and loyal technical team, committed to Ethical Values and Principles and the knowledge to make them the culture of Cikautxo Group.

All people must take the utmost care to preserve the image and reputation of the Cikautxo Group in all its professional actions. They will also monitor the proper and proper respect and use of corporate image and reputation by Suppliers, interested parties, Business Partners and Customers.

Linking, belonging or collaborating with political parties or other entities, institutions or associations for public purposes outside professional performance in the Cikautxo Group will be done in such a way as to clarify their personal character, thus avoiding any relationship with the Cikautxo Group.

5.1 COMMITMENT TO EMPLOYEES

Privacy, use of personal data and confidentiality

The Cikautxo Group respects the privacy of individuals in all their manifestations, as well as their personal communications via the Internet and other media. In particular, the privacy and confidentiality of personal data shall be respected. Access to such data is limited.

Accordingly, the Cikautxo Group undertakes to protect all information related to the Persons who make up it and other third parties concerned, and not to disclose personal data except with

the consent of the persons concerned and in cases of legal obligation or compliance with judicial or administrative decisions. Personal data may under no circumstances be processed for purposes other than those provided for by law or contract.

Occupational Safety and Health

The Cikautxo Group is committed to providing the organization's people and all its interested parties with a safe and healthy working environment, both in their processes and in their facilities. It therefore has a management system for occupational safety and health based on ISO 45001 which ensures compliance with the legislation and is committed to continuous improvement.

All persons performing their functions in the facilities of the Cikautxo Group have an obligation to know and comply with policies, standards and to use the established resources related to safety and health at work, in a safe, responsible manner, in order to prevent and minimize occupational risks. The Cikautxo Group provides its working people with a safe, clean and healthy workplace, in compliance with applicable legislation.

Persons are provided with the means necessary to perform their professional activity with appropriate safety, ergonomics and hygiene measures, so as not to endanger the life, health or physical integrity of persons.

Persons shall at all times respect the applicable preventive measures in the field of occupational safety and health, using the resources established by the Cikautxo Group and ensuring that the members of their teams perform their activities in safety conditions.

The Cikautxo Group ensures that its employees are sufficiently trained to perform their work safely.

The Cikautxo Group promotes healthy living among its employees by disseminating good practices and behaviors in the field of food, physical exercise, smoking and personal health care...

5.2 COMMITMENT TO THE ENVIRONMENT

Environment

Cikautxo Group is committed to minimizing the environmental impact of its activity. It therefore has an environmental management system certified according to ISO 14001, which ensures compliance with the legislation and is committed to continuous improvement.

People of the organization should strive to minimize the environmental impact resulting from the use of the facilities, assets and resources made available to them. They are also actively and responsibly committed to the conservation of the environment, being aware of all activities, products and services in which the Cikautxo Group can influence or impact the environment, and must be aware of and comply with the policies, procedures and instructions of the Environmental Management System in place of work and in the field of its responsibility. The Cikautxo Group is committed to improving the environmental conditions of installations.

Special care is given to the handling, possession and transport of explosives, flammable or corrosive substances, toxic or suffocating substances, or any other materials, apparatus or appliances which may endanger the health of persons or the environment.

The actions developed by the Cikautxo Group relating to urbanization, construction or building shall be carried out with the utmost respect to the urban and administrative legislation applicable in each case.

Commitments to sustainable development and commitment to society

Cikautxo Group is committed to a sustainable use of resources throughout its productive and non-productive processes by means of continuous analysis and monitoring of consumption, and by defining and implementing measures to improve the efficiency of its use and the improvement of facilities and their energy efficiency, with the ultimate aim of producing with the least carbon footprint possible.

Cikautxo Group believes in the need to return to the environment some of the benefits that have contributed to its development by supporting the social initiatives most identified with the personality of the cooperative and contributing to the social transformation of the environment.

5.3 SOCIAL AND PERSONNEL ISSUES

Working conditions and relations:

Contracts: compliance with existing legislation

The Cikautxo Group will recruit its employees in compliance with the legislation in force in each country, with a valid contract or document.

Wage conditions

The Cikautxo Group will guarantee remuneration in accordance with external context standards, in compliance with the legislation in force in each country.

The Cikautxo Group shall keep records of the payment of wages and hours worked by each employee.

Working hours and overtime

The working day or calendar of the working persons of the Cikautxo Group must not exceed the legal limit in any case.

All working persons shall be provided at least one day off in each seven-day period, except in the event that special timetables are defined to ensure rest in attendance schedules, in any case in compliance with the applicable legislation of the country and the established rest time.

Overtime Compensation

The Cikautxo Group, if necessary, will compensate for overtime worked by its employees according to the country's legal requirements and internal regulations.

Permits

The Cikautxo Group will guarantee the right to leave for its working people in accordance with the laws in force and applicable to each country and to domestic regulations.

Benefits

The Cikautxo Group should provide its employees with at least the benefits to which they are entitled by law (health insurance, social security, pensions, etc.).). It will also distribute to its employees a percentage of the profits obtained by its company/plant in the form of annualized variable remuneration.

Prohibition of discrimination and harassment

All employees, regardless of race, nationality, social origin, possible disability, disease, sexual orientation, political or religious conviction as well as their gender or age, or any other circumstance likely to be a source of discrimination, will be treated strictly according to their skills and qualifications in any employment decision, including but not limited to hiring, promotion, compensation, benefits, training, dismissal and termination of contract.

Social dialogue and collective agreements

The Cikautxo Group is committed to respecting the right of working people to freedom of association and collective bargaining.

The Cikautxo Group will systematically establish communication actions to promote social dialogue by maintaining a live information flow among the People who make up the organization serving as information support, dissemination and negotiation.

Hiring policy

The Cikautxo Group is pursuing a policy of employment in accordance with the legislation in force in each country in which it operates, including, in accordance with it, everything that gives the right to social protection, that demonstrates a commitment to stable and quality employment, and that establishes a remuneration policy to meet a decent standard of living.

Cikautxo Group guarantees a rigorous and systematic selection policy in accordance with the above-mentioned point on non-discrimination, exclusively on the academic, personal and professional merits of the candidates and the needs of the Group.

Equality and a respectful working environment

The Cikautxo Group aims to create a working environment in which trust and mutual respect prevail for what all people will promote at all professional levels, relationships based on equality, mutual respect, integrity, cordiality, trust and collaboration, and teamwork effort, fostering a respectful working environment. Disrespect and consideration, offense, defamation, intimidation, abuse, harassment or any kind of psychological, physical or sexual assault are unacceptable and will not be allowed or tolerated at work.

The Cikautxo Group also encourages family reconciliation, enabling employees to strike a balance between their professional and personal lives by responding to specific needs that may arise in their case.

5.4 BUSINESS ETHICS

Prohibition of child and forced labour

Any form of child labour is prohibited. Unless a higher age limit is established by local law, the Cikautxo Group may not employ any person under the age of 18, except under the conditions provided for by ILO Convention No. 138 and trainees with whom an employment contract is concluded. Trainees who are under the age of 18 should not engage in hazardous work and should be restricted from night work with educational needs.

Any form of forced labour is prohibited. This includes forced prison work, labor servitude or otherwise.

Prohibition of trafficking in human beings and protection of foreign citizens

The Cikautxo Group assumes the protection of foreign citizens by complying with the relevant regulations on aliens.

Persons who are members of the Cikautxo Group shall not cooperate in a person who is not a national of a State of the European Union entering, staying or transiting in the State in a manner which infringes the applicable legislation on the entry or transit of aliens.

Economic and financial information

The economic and financial information of the Cikautxo Group will faithfully reflect its heritage reality, committing itself to being transparent in its operations, complying with the current regulation applicable in its activity in each country and territory where it operates in accordance with applicable laws and regulations, as well as generally accepted accounting principles and applicable international financial reporting standards. For this purpose, the Cikautxo Group's annual accounts are audited, both individually and in a consolidated manner.

Accounting records and internal registers should clearly, accurately reflect and integrate transactions at a level of detail sufficient to ensure proper decision-making. All must comply with the accounting and reporting rules applicable in each case.

No Person shall conceal or distort information from the accounting records and reports of the Cikautxo Group, which shall be truthful and accurate.

The Cikautxo Group is committed to providing reliable information to the markets and to society at large, enabling a faithful image of the Cikautxo Group to be formed.

Cikautxo shall establish the necessary measures to ensure that information is not falsified, or that deliberate errors are made in the preparation, registration or maintenance of records, state and financial audits

Anti-corruption policy

Cikautxo Group is opposed to corruption and bribery in all its forms and to unlawfully influence the will of people outside the Cikautxo Group to gain some benefit or advantage. Extortion and bribery are expressly prohibited, including the offering or direct or indirect promise of any kind of illicit advantage, as well as the trafficking of influence.

Consequently, persons in their relations with public administrations, both nationals and third countries and with companies and/or international organizations, must behave in such a way that they do not induce a private individual, authority or public official to violate their duties of impartiality or any legal precept. The prohibitions set out in this paragraph also extend to persons closely linked by family ties or friendship to the individual, authority or public official concerned.

Anti-competitive policies

Cikautxo Group is opposed to any person linked to the Group being involved by action or omission of any practice that might be considered anti-competitive. This will affect agreements with competitors or disclosure of confidential information to third parties that may adversely affect the interests of other competitors and/or potential customers. The Cikautxo Group complies with the competition rules, avoiding any conduct constituting or likely to constitute a collusion, abuse or restriction of competition or price disruption.

The activities of the Cikautxo Group and its competitors or third parties shall not be unfair or misleading or denigrant.

Prohibition of smuggling

Import and export activities shall comply with the duties imposed by the applicable legislation, the internal rules of the Cikautxo Group and the external rules imposed by other operators.

Consequently, actions that may be related to smuggling are expressly prohibited. In view of the existence of doubts as to the possible incursion into a prohibited activity, the Compliance Committee should be consulted.

Gift policy

Gifts or presents are intended to promote the brand image of the Cikautxo Group. Consequently, it is allowed to offer gifts or presents of limited economic value, such as propaganda objects of low value or courtesy gifts.

Neither the direct personnel nor the other members of the Cikautxo Group may offer, grant, request or accept, directly or indirectly, gifts, invitations, favors or compensation, in cash or in kind, whatever their nature for purposes not legal or contrary to this Code of Conduct.

Any invitation, gift or attention that by its frequency, characteristics or circumstances may be interpreted as being made with the will to influence the objectivity of the recipient, shall be rejected or returned, and brought to the attention of the directly responsible and the Compliance Committee as soon as possible.

If it is not possible to return it, it will be delivered to the Financial Department, which will include it in the inventory of gifts for social interest purposes.

Prevention of money laundering and terrorist financing

The Cikautxo Group shall comply with the applicable national and international provisions on money laundering and terrorist financing. Customer identification, information and internal

control measures established for this purpose shall be applied and maximum cooperation shall be provided with the competent authorities.

In order to prevent and prevent money-laundering or terrorist financing operations, Individuals should pay particular attention to the prevention of conduct that might be related to such unlawful conduct.

Conflicts of Interest

The Cikautxo Group considers that the relationship with the people who integrate it must be based on the loyalty that derives from the common interests in it. Therefore, people should avoid any situation of Conflict of Interest. In general, it will be prohibited to contract or promote the hiring of services with family business in which there is a conflict of interest.

Conflict of Interest shall be considered to exist in situations in which external, financial, family, political or personal business interests may interfere with the judgment of the members of the Cikautxo Group when carrying out their tasks in the organization.

The Person facing a Conflict of Interest shall, as soon as possible, inform the person holding the Director of the Conflict of Interest in which he or she is incurred. In case of doubt as to whether there is a conflict of interest, it shall be submitted to the interpretation of the Compliance Committee. In addition, the Person affected by the Conflict of Interest shall refrain from intervening or influencing the decisions affected by the Conflict of Interest, from participating in meetings in which such decisions are raised and from accessing information affecting the Conflict of Interest.

Political activity

Any person of the Cikautxo Group has the right to participate individually in political matters, but his participation in politics will not be related to the Group.

No society in the Cikautxo Group may illegally finance candidates or political parties.

Access to funds and credits of public origin is strictly prohibited without prior authorization from the Financial Directorate of the Cikautxo Group.

Grants

The application for grants by any of the companies of the Cikautxo Group will always be supervised by the Financial Corporate Area of the Group, which will ensure the correct application of the relevant regulations, with external advice for management and ensuring the correct justification of them through external audits.

Cikautxo Group shall ensure that the aid applied for or received from public administrations is appropriately used, avoiding distortion of the conditions for obtaining it or giving it a different use than that for which it was granted.

5.5 SUPPLIERS

The suppliers shall respect the protection of human rights, minimum working conditions, environmental responsibility and avoidance of corruption. Accordingly, the supplier expresses zero tolerance to the offences and its commission is expressly prohibited both directly and through third parties, in relation to the execution of the Contract.

It also undertakes not to carry out any corruption, including bribery, influence trafficking and money laundering, and to prevent such conduct from occurring within its organization. These events affect both the supplier and its entire staff, as well as all subsequent sub-suppliers, subcontractors and any persons related to the Provider.

5.6 INFORMATION SECURITY

The information generated in the performance of the professional activity of the people of the Cikautxo Group (technical, financial, commercial, etc.) is owned by the Cikautxo Group and should therefore be protected. Anyone who is not the property of the Cikautxo Group must be used in accordance with the legal provisions.

Information of a non-public nature held by the Cikautxo Group, whether in digital form or in any other form, shall generally be considered as confidential information. Accordingly, any person of the organization must respect the principle of professional secrecy.

The persons of the Cikautxo Group are under an obligation to ensure the confidentiality of such information with the utmost caution and shall provide sufficient means to protect it, without its content being provided to third parties, unless expressly authorized by the person or body of the Cikautxo Group that is competent in each case or unless required by law, judicial or administrative authority.

For this purpose, all internal rules on the use of information and confidentiality that exist in the Cikautxo Group during the development of projects should be known and complied with.

Third party information shall be obtained by law. Persons shall reject the information obtained improperly or in breach of the confidentiality under which it is maintained by their legitimate owners.

Where confidential information belongs to third parties outside the Cikautxo Group, Individuals shall comply with the confidentiality agreements that the Cikautxo Group has signed with them.

In case of termination of the employment relationship with the Cikautxo Group, the duty of confidentiality of the Persons shall be maintained and the Persons shall return the documents and storage means or devices, as well as the information stored in their computer terminal related to the confidential information.

5.7 USE OF THE ORGANIZATION'S ASSETS

The people of the Cikautxo Group have the means they need to develop their professional activities. The assets that the Cikautxo Group makes available to its employees include but are not limited to physical property, confidential information and intellectual property.

Both the misuse and inappropriate use of the assets of the Cikautxo Group constitute fraud.

Employees of the Cikautxo Group must protect and make responsible use of the resources and assets that the company makes available to them, avoiding their damage, loss, theft or improper use. The resources of the Cikautxo Group should be used exclusively for the discharge of the responsibilities assigned.

5.8 PROTECTION OF INDUSTRIAL PROPERTY - INTELLECTUAL PROPERTY.

Industrial or intellectual property developed by the staff of the Cikautxo Group is a heritage to be protected.

The rights to exploit the intellectual, industrial and business secrets generated by the persons during the performance of their professional activity in the Cikautxo Group shall be the ownership of the latter.

Intellectual property and industrial property rights (copyright, patents, industrial designs and other rights) as well as business secrets held by Customers or any other third parties with which the Cikautxo Group relates shall also be respected. Accordingly, all persons should endeavour to protect information subject to intellectual property rights, industrial property and business secrets by collecting, in each case, licences or authorisations from the legitimate holders of such rights, including in relation to the use of trademarks, logos and other distinctive signs of third parties.

Cikautxo Group is working towards maximum protection of computer security. Consequently, the use of software not authorized for all persons in the Cikautxo Group, as well as the installation of software in the same malicious software, or any other software or software not expressly authorized by the IT department of Cikautxo, is prohibited.

The Cikautxo Group makes available to its employees the assets and resources necessary for the development of its activity. It will be the responsibility of each person to custody, as well as to manage their access passwords, applying the protocols defined for this purpose.

It is the responsibility of every employee of the organization to make good use of computer means in order to avoid causing damage to other property, such as unusing or deleting data, software or computer documents.

In Berriatua 23 of July of 2021



Iñigo Laskurain

General Manager



Javier Principe

President

