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CODE OF CONDUCT

—
2022

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1.- Purpose

The Fagor Arrasate Group aims to ensure that its conduct and that of its members complies with current legislation and the values and ethical principles set out in this Code of Conduct. For locations where the law and regulations are unclear or less demanding, this Code of Conduct shall be the reference standard to be met.

Purposes:

- To establish ethical values and principles stemming from the guidelines of conduct which are to be followed regarding professional activity, personal relationships within the Fagor Arrasate Group, and with suppliers, associates, customers, public administrations and society as a whole.
- To cultivate management dynamics which are in accordance with the culture of cooperation and which favor an ethical, sustainable, socially responsible, shared model for procedure.
- To prevent criminal risks for legal persons, included in the legal system of some countries in which the Fagor Arrasate Group operates.

The Fagor Arrasate Group does not tolerate any act which is against this Code of Conduct. All company bodies (Supervisory Committee, Social Council, CSR Committee, Advisory Council and Board of Directors) shall ensure the actual and effective application of the values and ethical principles set out in this Code, and non-compliance shall be managed by the Corporate Social Responsibility Committee (hereinafter CSR Committee).

This Code of Conduct is made public for the knowledge of society in general and for the knowledge and application on the part of the stakeholders of the Fagor Arrasate Group in particular, such as customers, suppliers and auditors.

2.- Scope, Requirements and Commitment to Compliance

The Code of Conduct applies to all the companies that make up the Fagor Arrasate Group (Fagor Arrasate S.Coop. and the companies under its control) and binds all its personnel, regardless of their position or geographic or functional location.

The application of the Code, in whole or in part, may be extended to any natural or legal person related to the Fagor Arrasate Group, when it is convenient for the fulfillment of its purpose and is possible due to the nature of the relationship.

The people who make up the Fagor Arrasate Group are obliged to know and comply with the contents of this Code of Conduct and the values and ethical principles contained in it, whether they have expressly subscribed to it or not.

3.- Group Values

As a founding member of the Mondragon Group, at Fagor Arrasate we base our values on the Basic Cooperative Principles. These principles are a set of ideas forged over the span of more than six decades of cooperative work.

At Fagor Arrasate, we share and apply the Basic Principles of the Mondragon Cooperative Experience in our day-to-day work and we make them our own by means of the Declaration of Principles at the top of our Articles of Association.

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The values with which we seek to define our character, thus creating a sense of identity that fosters cohesion and develops a distinct management philosophy, are:

- **COOPERATION:** the company's employees are owners and protagonists in all the areas of activity of Fagor Arrasate.
- **INNOVATION:** we seek permanent renewal in all the fields of our activity.
- **PARTICIPATION:** participation in and commitment to management by all the people who make up the organization is a right, as well as a commitment.
- **SOCIAL RESPONSIBILITY:** Fagor Arrasate is committed to the distribution of wealth based on solidarity, focusing on having a significant impact on the immediate environment, with whose improvement and development we feel a sense of solidarity.

The daily actions of Fagor Arrasate are summarized below:

- It is based on solidarity commitments and uses democratic methods in its organization and management.
- It promotes the participation and integration of people into their companies' management, results and ownership, which develop a common project thus harmonizing social, business and personal progress.
- Promotes training and innovation for the development of human and technological capabilities.
- It applies its own management model to achieve leadership positions and promote cooperation.

4.- Ethical Principles and Norms of Conduct

4.1 GENERAL RULES OF CONDUCT

- **Professional and Integrity**

The conduct of the people in the Fagor Arrasate Group must be based on professionalism and integrity.

- a) Professionalism: diligent, responsible, sensible and efficient performance.
- b) Integrity: acting loyally, honestly and in good faith, showing respect for oneself and for others in the exercise of one's professional activity.

Individuals shall apply the values and ethical principles set out in this Code to themselves and to others and shall not exercise their professional activity for purposes other than those for which it is intended.

- **Respect for the law, the internal rules and the contracts that bind the Fagor Arrasate Group**

All persons shall carry out their professional activities with respect for current legislation, internal regulations and the contracts that bind the Fagor Arrasate Group and must comply with this Code of Conduct and all the controls included in the Management System.

The members of the Advisory Council, Board of Directors and the rest of the bodies (Supervisory Committee, Social Council, etc.), as well as the persons who manage or lead teams, must:

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- a) Have a thorough knowledge of the legislation, Code of Conduct, controls and contracts that affect their respective areas of activity.
- b) Be a benchmark for the conduct of the Fagor Arrasate Group.
- c) Watch over the people under their management and ensure that they receive adequate information and training to enable them to understand and comply with the legislation, the Code of Conduct, the controls and the contracts linked to the Fagor Arrasate Group which concern them.

- **Conflict of Interest Policy**

It shall be deemed that a conflict of interest exists when the personal interest of someone in the Fagor Arrasate Group clashes with, influences or distorts the interest of the company itself. It shall be understood that a personal interest exists when the matter directly affects the person themselves or another person related or connected with said person.

The following will be deemed as related persons: their spouse or someone with a similar personal relationship; their immediate relatives, siblings and their spouses (or persons with a similar personal relationship); and the companies or enterprises in which the person, or those related to them, are in a situation of control or hold a position related to administration or management, directly or indirectly.

The person facing a conflict of interest shall inform the CSR Committee as soon as possible. The person concerned shall refrain from intervening in or influencing decision-making, from participating in meetings at which such decisions are discussed and from accessing confidential information relating to the conflict.

4.2 UNITED NATIONS GLOBAL COMPACT

The United Nations Global Compact (UN Global Compact) to promote Corporate Social Responsibility (CSR) calls on companies to adopt, support and promulgate - within their sphere of influence - a set of core values in the Human Rights, Labor Standards, Environment and Anti-Corruption areas. To this end, the Fagor Arrasate Group adopts the ten principles of the United Nations Global Compact as their own:

HUMAN RIGHTS

- **Principle no. 1:** To support and respect the protection of internationally proclaimed human rights.
- **Principle no. 2:** To make sure that we are not complicit in human rights abuses.

LABOR FIELD

- **Principle no. 3:** To uphold freedom of association and effectively recognize the right to collective bargaining;
- **Principle no. 4:** To eliminate all forms of forced and compulsory labor.
- **Principle no. 5:** To abolish child labor.
- **Principle no. 6:** To eliminate discrimination in respect of employment and occupation.

ENVIRONMENT

- **Principle no. 7:** To support a precautionary approach to environmental challenges.
- **Principle no. 8:** To undertake initiatives to promote greater environmental responsibility.
- **Principle no. 9:** To encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

- **Principle no. 10:** To work against corruption in all its forms, such as extortion and bribery.

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The guidelines related to these principles are developed below.

4.2.1 HUMAN RIGHTS

• Respect for people

Everyone shall promote relationships based on mutual respect, integrity, cordiality, trust, collaboration and teamwork. They will also foster a respectful work environment in order to achieve a positive work environment.

Disrespect and lack of consideration, offenses, defamations, intimidations, abuses, harassment or any other kind of psychological, physical or sexual aggression is not permitted or tolerated.

4.2.2 LABOR STANDARDS

• Commitment to labor legislation compliance

The Fagor Arrasate Group undertakes to comply with current legislation requirements and to exceed them, wherever possible, in relation to:

- Employment contracts (salary, work hours, work schedule, insurance, etc.)
- Working conditions (healthy, clean and safe environment, etc.)
- Rejection of child labor and forced or compulsory labor
- Non-discrimination and equal opportunities
- Harassment (a procedure is in place to deal with these situations)
- Right to privacy (protection of personal data)
- Respect for the right to association and collective bargaining

• Forced labor prohibition and recruitment policies

Work obtained by forcing the will of the worker by means of threats, punishment, deprivation or the application of slavery or semi-slavery conditions is rejected and is not applied or resorted to, directly or indirectly.

The Fagor Arrasate Group follows a recruitment policy pursuant to current legislation, providing the legally stipulated leave (holidays, illness and accidents, maternity and paternity, retirement, etc.), and establishes a remuneration policy which ensures a decent standard of living.

The work day or schedule of the Fagor Arrasate Group does not exceed the legal limit under any circumstances, and workers are compensated for overtime in accordance with legal provisions.

• Protection of minors

The protection of minors is an Ethical Principle of the Fagor Arrasate Group that implies not resorting to child labor, as it is understood as work that deprives them of their childhood, their potential and their dignity, and which is harmful to their physical and psychological development.

• Equal opportunities and non-discrimination

Effective equality of opportunity and treatment in regard to employment access and professional promotion is upheld and facilitated, ensuring there is no discrimination on grounds of race, sex, ideology, sexual orientation, age, disability, illness or any other circumstance at all times.

Consequently, the people involved in recruitment, selection and/or professional promotion processes will be objectively driven, seeking to identify those people which are most in line with the profile and needs of the post to be filled, thereby promoting equal opportunities.

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• **Workplace health and safety policy**

The Fagor Arrasate Group carries out health and safety risk prevention by integrating preventive activity within the organization and adopting the necessary measures aimed at preventing accidents, injuries and work-related illnesses.

People shall respect the preventive measures applicable to health and safety at work at all times, using the resources established by the Fagor Arrasate Group.

The Fagor Arrasate Group is committed to complying with all current legislation applicable to this area of work.

Fagor Arrasate has a medical care service and complies with a health monitoring plan for all the people in the organization.

Fagor Arrasate has certified its occupational risk prevention management system in accordance with the ISO 45001 standard and is committed to working to maintain this certification (or an equivalent one) and to improve its performance in this area as evidence of its responsibility for the well-being, health and safety of the people in the organization.

• **Continuous training**

We provide the means to contribute to the learning, training and updating of people's knowledge and skills, in order to facilitate their professional progress and provide more value to customers and society in general.

All members of staff must take the training courses taking into account their professional functions and the activities they carry out within the Fagor Arrasate Group and shall make every effort to get the most out of them.

• **Respect for external activities**

The performance of social and public activities is respected, as long as they do not interfere with the professional activity.

The link, membership or collaboration with political parties or other types of entities, institutions or associations outside the professional performance in the company is to be carried out in such a way that its personal nature is clear, thus avoiding any connection with the Fagor Arrasate Group.

4.2.3 ENVIRONMENTAL POLICY

• **Environmental protection, management and responsibility**

The Fagor Arrasate Group is firmly committed to the protection, conservation and improvement of the environment. The company's activity will therefore be carried out in such a way as to minimize adverse environmental impacts.

To this end, people are committed to the efficient use of both materials and energy in the company's facilities and when carrying out the activity, with the aim of preserving natural resources.

The Fagor Arrasate Group is aware of the risks that future generations will have to face if essential life ecosystems are endangered, and is therefore committed to the responsible management of products and manufacturing processes from the point of view of health, safety and the environment.

The Fagor Arrasate Group is committed to complying with current environmental legislation.

In line with this responsibility, Fagor Arrasate has certified its management system in this area according to ISO 14001, a certification that it undertakes to maintain (or an equivalent one), while

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working on the continuous improvement of its performance in this area, as a display of its commitment to sustainable development.

- **Environmentally friendly technologies**

The development and dissemination of environmentally friendly technologies is embraced as a challenge, both for internal use and for incorporation into products for customers. These technologies pollute less, use resources in a sustainable way, recycle more of their waste and products, and handle waste in a more acceptable way than the technologies they replace.

4.2.4 ANTI-CORRUPTION POLICY

- **General Considerations**

The Fagor Arrasate Group is against corruption in all its forms, and will ensure that it does not unlawfully influence the will of people outside the company in order to obtain any benefit or advantage. Acts of corruption or bribery are expressly prohibited, including the direct or indirect offer or promise of any kind of illicit advantage, as well as influence peddling.

Likewise, the people of the Fagor Arrasate Group will not tolerate being pressured into taking decisions that harm the organization and benefit third parties, third parties being any person at the service of any public or private entity.

- **Gift Policy**

No gifts, favors or compensation, in cash or in kind, whatever their nature, may be directly or indirectly given or accepted to unlawfully influence the company relationships. In particular, no employee of the company may offer, grant, request or accept gifts, favors or compensation to or from a natural or legal person with whom the company maintains relationships of any kind that, isolated or added together in the period of a year, have a value greater than 100 euros or its equivalent in local currency. Gifts of cash are expressly prohibited.

- **Public Administrations Relations**

No form of bribery may be received or given to State or foreign authorities, public officials or to political parties.

The Fagor Arrasate Group abstains from making, by itself or through intermediaries, any donation, contribution, not even in the form of a loan or advance, that implies the illegal financing of political parties.

- **Social responsibility in the supply chain**

Nor may we give or receive any form of bribery to or from suppliers, associates or customers. Relationships with supplier companies are guaranteed to exclude corruption and bribery practices.

- **Prevention of money laundering and terrorist financing**

The Fagor Arrasate Group complies with the applicable national and international provisions on money laundering and the financing of terrorism.

Customer identification, information and internal control measures established for this purpose are applied, and maximum cooperation is provided to the competent authorities.

4.3 TRANSPARENCY, INFORMATION AND COMMUNICATION

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• **Business ethics. Transparency Policy**

The Fagor Arrasate Group assumes the commitment to transmit reliable information to the markets and to society in general, faithfully reflecting its equity reality pursuant to accounting principles and international financial reporting standards.

The use of deception in order to mislead third parties is prohibited and, in particular:

- a) In dealings with suppliers, associates, customers and public authorities, no appearance of unreal solvency should be given.
- b) It is forbidden to falsely attribute to oneself powers of disposal that one lacks in order to dispose of, transfer and encumber the assets of the company.
- c) No false pretense regarding the actual characteristics of the goods and/or conditions that are the subject of the contract is made.

The Fagor Arrasate Group draws up and completes contracts pursuant to the principles of transparency, truthfulness and good faith, and includes matters referring to payment conditions, guarantees and the capacity of the signatories to act on behalf of and represent the contracting parties within the drafting of said contracts.

• **Cooperation and transparency with public administrations**

Relations with authorities, regulatory bodies and public administrations are based on the principles of cooperation and transparency. Obligations to the various public administrations must be fulfilled, in particular those duties related to the Public Treasury and Social Security and those related to administrations from which aid or subsidies are received.

Any conduct aimed at avoiding tax obligations or obtaining benefits to the detriment of the Treasury, Social Security and equivalent bodies is expressly forbidden.

4.4 USE OF INFORMATION AND OTHER RESOURCES

• **Protection of privacy. Use of personal data**

The Fagor Arrasate Group respects people's right to privacy in all its forms, as well as in personal communications. In particular, privacy and the right to protection of personal data are respected.

• **Responsible use of assets and resources**

The assets and resources necessary for the individual's professional activity performance are made available to them, including means of communication, computer systems and equipment, technological resources, facilities and financial resources. The people, for their part, will make responsible use of these assets and resources.

• **Policy of confidentiality, treatment and protection of non-public information**

To the Fagor Arrasate Group, information and knowledge are part of its main and essential assets for business management, and are therefore subject to special protection to prevent uncontrolled access to them.

The following is deemed non-public information (confidential, restricted or general):

- All that which has been explicitly declared non-public.
- Information received from third parties under a confidentiality agreement
- Information of the workers, other companies or third parties in a relationship with Fagor Arrasate which has not been made public by its owners

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The non-public information held by the Fagor Arrasate Group will be used with the utmost caution and the necessary means will be put in place to protect it, in accordance with the Information Security Procedure SPM 5.5. All Fagor Arrasate Group employees undertake to maintain discretion and confidentiality with regard to all the information they manage in the performance of their work. No one may disseminate non-public information without receiving authorization pursuant to this procedure. The dissemination, disclosure or transfer of a company secret by whoever has a legal or contract obligation to keep a reservation, or appropriation, disclosure or transfer of data, media or documents to discover a company secret is not allowed.

Information obtained from third parties, including competitors, shall be obtained in a lawful manner, and inappropriately obtained information shall be rejected.

In the event of termination of the employment relationship, people's confidentiality duty shall be maintained, and they shall return documents, storage devices and stored confidential information.

The Fagor Arrasate Group is committed to complying with all current legislation on data protection.

- **Respect for intellectual and industrial property rights**

The people who make up the Fagor Arrasate Group must respect the company's intellectual and industrial property rights and business secrets. The exploitation rights of the intellectual property, industrial property and business secrets are owned by Fagor Arrasate.

Intellectual and industrial property rights and business secrets held by third parties outside the Fagor Arrasate Group must also be respected. In particular, the reproduction, copying or distribution of scientific works, images, trademarks, ... and the installation of software programs without a license or without the authorization of the rights holders will be avoided.

The protection of IT security is ensured in accordance with the provisions of SPM 5.5 Information Security.

4.5 COMMUNITY INVOLVEMENT

- **Cultural Integration**

Local culture and language are promoted in the work centers by integrating them into daily practices, as well as in customers, supplier and public administration relations.

- **Economic resourcing**

Part of the profits generated in the Fagor Arrasate Group is allocated to activities that promote the education, training and development of the inhabitants of the regions where our production centers are located.

- **Protection of free competition and the market**

The Fagor Arrasate Group will comply with antitrust regulations, avoiding any conduct that constitutes or could constitute collusion, abuse or restriction of competition, or alteration of prices. Any conduct that may constitute an abuse or unlawful restriction of competition shall be avoided.

In relation to the participation of the Fagor Arrasate Group in any organization, the principles of action necessary to guarantee respect for the free formation of prices are established.

- **Relationships with suppliers, partners and customers**

Criteria based on sustainability and social responsibility are taken into consideration during the selection processes of supplier companies, thus promoting the application of socially responsible practices throughout the organization's supply chain. All persons must apply criteria of quality, opportunity, cost and sustainability during the selection process of suppliers, associates and clients.

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- **Promotion of the image and reputation of the Fagor Arrasate Group**

The Fagor Arrasate Group has a solid reputation thanks to its extensive experience and to a solvent and loyal team of people who are committed to the values, ethical principles and know-how that make up its culture.

All persons must be extremely careful in all their professional activities so as to preserve the image and reputation of the Fagor Arrasate Group. Likewise, they will monitor the respectful, correct and appropriate use of the corporate image on the part of suppliers, associates and customers.

- **Crime and criminal risk prevention (criminal compliance)**

Criminal compliance is a work area integrated into the management of Fagor Arrasate, area to which it devotes attention and resources.

The Fagor Arrasate Group is committed to complying with current legislation in this respect through the PSG 9.1 Criminal Risk Prevention Manual.

- **Policy on donations, sponsorship and participation in foundations and associations, and political contributions**

The Fagor Arrasate Group does not participate in political activities or make any kind of financial donation of a political nature. All interventions made in activities of a political nature will be personal.

The sponsorships are carried out as consideration for the opportunity to advertise the “Fagor” brand and the dissemination of cooperativism. Sponsorships in money are carried out in a transparent way, that is, the identity of the recipient and the reason and objective of the same must be justified and documented. Likewise, sponsorships are also carried out through the participation of Fagor Arrasate Group personnel in events organized by third parties.

All sponsorships and donations will be approved by the Governing Council.

To the same extent, as a responsible member of society and participant in an organization with a vocation for social transformation, the Fagor Arrasate Group participates in foundations and associations, mainly in the cultural and educational environment, which have a satisfactory impact on the environment. These sponsorships and participation in events, foundations and associations are not carried out in consideration of competitive advantages or other inappropriate purposes that could damage our image and reputation.

5.- Stakeholder Standards

5.1 CLIENTS

The Fagor Arrasate Group seeks stable, long-term relationships with its customers, based on trust and respect, meaning ethical behavior - which takes into account the legitimate interests of each party at all times - is essential.

The Fagor Arrasate Group works to always provide the best quality product and service to its customers, always taking into account ethical, labor, social, safety and environmental criteria. In this sense, Fagor Arrasate has a mechanism for listening to customers at the highest level so as to analyze their needs and expectations and implement actions for improvement.

The Fagor Arrasate Group has ISO 9001 certification in its production plants, which it undertakes to maintain, as a sign of its commitment to the continuous improvement of the quality of its management and the search for excellent performance in all areas of its activity.

The approach to the market and customers is based on ethical advertising and communication messages and the presentation of clear and honest commercial offers, where no doubts about the products or services

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offered arise, including:

- Contract including price, payment and delivery conditions
- Warranty and after-sales service
- Clear channels of communication to ensure a good business relationship, including complaints and claims

5.2 SUPPLIERS

Suppliers are necessary allies that allow the Fagor Arrasate Group to offer customers a good product and service. In the same way as with customers, with suppliers, we seek stable and long-term relationships which are based on mutual respect and ethical behavior.

The Fagor Arrasate Group evaluates its suppliers in terms of quality, price, service and payment conditions and reaches an agreement with them on action plans for the improvement of their performance that will benefit both parties.

The Fagor Arrasate Group will take note of its supplier's compliance guarantees regarding the rights of all workers, non-exploitation of children, non-forced labor, protection of health and safety at work and sustainable environmental management.

5.3 PUBLIC ADMINISTRATIONS

The Fagor Arrasate Group always maintains relationships based on loyalty, mutual trust, transparency, good faith and collaboration with all the different administrations in the places where it operates, complying with its tax obligations.

The Fagor Arrasate Group is committed to complying with all applicable laws and regulations.

5.4 SOCIETY

The Fagor Arrasate Group assumes the principles and values of the Mondragon Cooperative Group and is committed to:

- a fair distribution of wealth
- a desire for social transformation in order to achieve a freer, fairer and more united society
- working with all those who work for economic democracy in the field of social economy, endorsing the objectives of peace, justice and development, which are characteristic of International Cooperation
- the allocation of sufficient human and financial resources to co-operative, vocational and youth education

5.5 COMPETENCE

The Fagor Arrasate Group believes that competition, carried out in compliance with the law and in an ethical manner, favors the improvement of organizations and the economy.

The Fagor Arrasate Group undertakes to compete in a legal and fair manner, without unlawfully or disrespectfully advertising its competitors or third parties.

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The Fagor Arrasate Group undertakes to obtain the information of its competitors in a legal manner.

6.- Communication and Follow-up

6.1 COMMUNICATION AND AVAILABILITY OF THE CODE OF CONDUCT

This document, in its original format and content, is public and is available to anyone in the Fagor Arrasate Group for consultation on the Elkarnet / ElkarDocs / Management System / MSG 9 and on the website, also accessible to all stakeholders.

This document, in its original format and content, is public and is available to any Fagor Arrasate Group employee for consultation at Elkarnet and on the website.

6.2 INTERPRETATION

In the event of any discrepancy between this Code of Conduct and any control by the Fagor Arrasate Group Management System, the Code of Conduct shall prevail. In addition, interpretation of the controls shall be in accordance with the spirit and purpose of this document.

The CSR Committee is responsible for interpreting and resolving any doubts regarding the content of this document.

6.3 THE CORPORATE SOCIAL RESPONSIBILITY COMMITTEE (CSR)

This Committee is the maximum guarantor of the supervision, monitoring and control of the obligations derived from this Code of Conduct and is accredited to request and receive the full collaboration of the organization's remaining bodies. You have direct and immediate access to the Advisory Council (governing body) in case you need to report suspicious conduct or facts or other matters related to your role.

The Governing Council shall define the composition of the CSR Committee and appoint the CSR Officer. Currently they are part of it:

- President of the Governing Council, as CSR Officer
- Human Resources Director
- Vice-president of the Social Council
- Financial Director
- Sustainability Manager

This Committee's scope of responsibility extends to the entire Fagor Arrasate Group and its main responsibilities are as follows:

- the management of the Corporate Social Responsibility System in order to:
 - promote and monitor its implementation and effectiveness
 - provide training support to the members of the organization
 - promote the inclusion of job responsibilities within job descriptions and in the performance management processes of members of the organization
 - identify legal, social, labor and environmental risks (crimes) that may affect the organization, including those related to business partners, in order to assess them and take action to avoid them or reduce their probability of occurrence

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- advise the Board of Directors (senior management) and the Advisory Council (governing body) on suggestions, initiatives and proposals for improvement
- properly disseminate and communicate the Code of Conduct
- answer queries and doubts about the interpretation of all matters related to the Code of Conduct
- investigate communications and complaints received by looking into suspicious situations and communicating their decision with its proposal for action to the Advisory Council (the governing body)
- carry out an annual review of the compliance and content of all matters related to the Code of Conduct management and to propose the pertinent updates to the Board of Directors
- establish performance indicators and measure them for improvement
- report on the results derived from the implementation the Code of Conduct management to the Board of Directors (senior management), the Advisory Council (governing body) and to the organization once a year during the General Assembly
- all those assigned by the Governing Board as the supervisory and control body of criminal compliance

The Committee shall meet at least once every quarter and each time circumstances so require.

6.4 COMPLIANCE ASSESSMENT AND UPDATING

The Code of Conduct's degree of compliance and appropriateness regarding the circumstances will be annually assessed by the CSR Committee.

Any updates that are made must always be validated by the Advisory Council (governing body) and will be communicated to the entire organization.

6.5 NON-COMPLIANCE AND GROUNDS FOR REPORTING

Failure to comply with this Code may give rise to labor or corporate sanctions, without prejudice to any administrative or criminal sanctions that may also be applicable.

Internal channels for reporting non-compliance

Any person who has evidence or suspicions that a crime has been committed or that any of the principles and values recognized in the Code of Conduct and the policies relating to social responsibility have been violated should report it directly to any of the members of the CSR Committee or through the following e-mail address:

canaletico@fagorarrasate.com

The CSR Committee will guarantee: the confidentiality of the person making the report, who will be duly informed on how to proceed and will not suffer any kind of retaliation for this (provided that the report has been made in an honest manner, in good faith).

External channels for reporting non-compliance

Any person external to the Fagor Arrasate Group who has indications or suspicions regarding the perpetration of any crime, or of incorrect, unethical or inappropriate behavior by any person(s) of the

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Fagor Arrasate Group, may communicate it directly to the CSR Committee via the following e-mail address:

ethicalchannel@fagorarrasate.com

Failure to report a breach of which you are aware will be deemed a breach of this Code in and of itself.

6.6 CONFIDENTIALITY OF COMMUNICATIONS AND PROHIBITION OF REPRISALS

The Fagor Arrasate Group, under the duties assumed by the members of the CSR Committee, will guarantee confidentiality of the identity of the people who communicate with the Ethical Channel, respecting the requirements of the regulations relating to the protection of personal data.

Any action constituting retaliation or any type of adverse consequence for having made a communication is hereby forbidden.

The prohibition of retaliation shall not, however, preclude the adoption of disciplinary measures which may be applied if the internal investigation determines that the communication is false.

6.7 ETHICAL CHANNEL MANAGEMENT

The communications made through the Ethics Channel will reach all the members of the CSR Committee. The committee will decide whether to open an internal investigation or not.

During the internal investigation, the CSR Committee may gather all the information and documentation it deems appropriate from any area or business of the Fagor Arrasate Group. In the event that the communication affects a member of said Committee, this person may not participate in the processing and the provisions on Conflicts of Interest shall apply (see section 5.1).

6.8 DISCIPLINARY REGULATIONS

Fagor Arrasate has Internal Regulations, Chapter V of which states: The disciplinary labor regulations details the minor, major and critical offenses that may be committed by an employee in the performance of their work. The penalties for such offenses are detailed in article 96: Penalties for work-related misconduct.

Persons who breach the Code of Conduct shall be subject to the corresponding sanction pursuant to the Internal Regulations provisions, without prejudice to any other liabilities they may have incurred. Sanctions will be imposed by the Advisory Council (governing body).

7.- Preparation and validation

Drafting and updating the Code of Conduct is the responsibility of the CSR Manager of the Fagor Arrasate Group.

The Governing Council (governing body) validates the Code of Conduct.