

*Excerpt from the document "IDEKO CODE OF ETHICS (November 2023)", Section "4. General Rules of Professional Conduct", Subsection "4.4. Fight Against Fraud":*

#### **4.4. Fight Against Fraud**

- IDEKO ensures that its activities are conducted in compliance with the law and in the fight against corruption in all its forms. In this regard, IDEKO expressly reaffirms its strong commitment to refraining from engaging in practices that could be deemed irregular, including those related to money laundering, in dealings with client companies, suppliers and service providers, as well as with competitors and authorities.
- In this respect, IDEKO professionals shall not, either directly or through an intermediary, offer or grant, request or accept, any undue advantage or benefit with the immediate or indirect purpose of obtaining a present or future gain for the Cooperative, themselves, or third parties. In particular, they shall not give or receive any form of bribe or commission from or to any involved party, including but not limited to public officials—domestic or foreign—personnel of other companies, political parties, authorities, clients, suppliers, or shareholders. Bribery, which is strictly prohibited, includes the direct or indirect offer or promise of any improper benefit, any instrument used for concealment thereof, as well as influence peddling.
- It is also prohibited to personally receive money from client or supplier companies, even in the form of loans or advances.
- Regarding gifts or any other form of compensation, such items are forbidden unless they may be deemed customary tokens of courtesy in accordance with local customs and practices.
- Moreover, professionals must avoid any potential conflict of interest, whether direct or indirect, between their personal interests and the interests of IDEKO. In such cases, the professional shall report the matter to the Cooperative through their immediate supervisor so that it may be brought to the attention of the Compliance Committee, which shall take appropriate measures to resolve the conflict.
- If an IDEKO's employee becomes aware of any conduct that may be unlawful or contrary to the principles of the Code, they are required to promptly report it or request guidance through their immediate supervisor and/or the Compliance Committee

Rafael Lizarralde  
General Manager



Elgoibar, 1 January 2025