



Grupo
fedola

ANTI-CORRUPTION POLICY

GRUPO FEDOLA

GF-JURIDICO

VERSION CONTROL

VERSION	DATE	RESPONSIBLE	COMMENTS
1.0	18/05/2018	Criminal Compliance	Scope and creation
1.0	30/06/2023	Criminal Compliance	Review
1.0	17/04/2024	Criminal Compliance	Review
1.0	06/11/2024	Criminal Compliance	Review and adaptation to inclusive language

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The Board of Directors of Grupo Fedola is entrusted with the authority to design, assess, and permanently review the governance and sustainability system and, specifically, to approve and update corporate policies, which contain the guidelines governing the actions of the companies integrated into the Group.

1. OBJECTIVE

The objective of this policy is to reiterate Grupo Fedola's commitment to strict compliance with anti-corruption prevention and control regulations (**offering, promising, granting, receiving, requesting, or accepting an unjustified benefit, for oneself or for a third party, in order to unduly favour another person in the purchase or sale of goods, in the contracting of services, or in business relations**), developing the principles set out in Grupo Fedola's Code of Ethics and extending compliance not only to all employees of the entities, but also to our business partners (**partners, contractors, suppliers, agents, distributors, joint ventures, and other collaborating companies**).

2. BASIC APPLICABLE REGULATIONS

- **Organic Law 10/1995, of 23 November, on the Criminal Code.**
- **Law 38/2003, of 17 November, General Subsidies Law.**
- **Royal Decree 91/2019, of 1 March, regulating the composition and functioning of the Advisory Council for the Prevention of and Fight against Fraud affecting the financial interests of the European Union.**
- **Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption.**

3. SCOPE OF APPLICATION

This policy applies to all companies that form part of the Group and over which it has effective control, within the legally established limits.

For the purposes of this policy, **Grupo Fedola** or **the Group** shall be understood as all the companies that form part of it and to which this policy shall apply:

GRUPO FEDOLA, S.L.; PREFABRICADOS TEIDE, S.L.; FERRETERIA HERMANOS LÓPEZ ARVELO, S.L.U.; OFISABEL, S.L.U.; MASQUECARPAS, S.L.U.; FEDOLA, S.L.U.; BROKER FEDOLA CORREDURÍA DE SEGUROS, S.L.U.; PRICEMESA, S.L.U.; GF-TIC, S.L.U.; CAMULSE, S.L.U.; EXPLOTACIONES SANTONEL, S.L.; FELAHOTEL, S.L.; COSTA ADEJE GRAN HOTEL, S.L.; ISABEL FAMILY HOTEL, S.L.U.; NOELIA PLAYA, S.L.U.

4. COMMITMENTS

Grupo Fedola rejects all forms of corruption, applying a **zero-tolerance** criterion with respect to any breach of this policy.

In order to prevent corruption, Grupo Fedola shall carry out all its activities in accordance with current legislation in all areas in which it operates, in keeping with both the spirit and the purpose of such legislation, and undertakes to:

- **Not influence the will or objectivity of persons outside the company in order to obtain any benefit or advantage through the use of unethical practices and/or practices contrary to applicable law.**
- **Not give, promise, or offer, directly or indirectly, any item of value (cash or cash equivalent, gifts, loans, gratuities, advantages, or benefits of any kind) to any natural or legal person, in order to obtain improper advantages for the company.**
- **Not permit any facilitation payment (a small payment made to lower-ranking public officials intended to expedite or facilitate the performance of their responsibilities, such as access to public services, the obtaining of ordinary licences or business permits, administrative procedures, the provision of police protection, or the loading and/or unloading of goods).**
- **Not finance or provide support or backing of any kind, directly or indirectly, to any political party, its representatives, or candidates.**
- **Not use donations to conceal improper payments.**
- **Not request or improperly receive, directly or indirectly, commissions, payments, or benefits from third parties on the occasion of, or arising from, the investment, divestment, financing, or expenditure operations carried out by the company.**
- **Pay special attention to those situations in which there are signs of a lack of integrity on the part of the persons or entities with whom business is conducted, in order to ensure that Grupo Fedola establishes business relationships only with qualified persons and entities with an appropriate reputation.**
- **Accurately and faithfully record all the company's actions, operations, and transactions in its books and records.**
- **Promote internal training on the prevention of and fight against corruption.**

5. REVIEW

Criminal Compliance shall periodically review the content of the policy, ensuring that it reflects the recommendations and best practices in force at any given time, and shall propose to the Board of Directors any amendments and updates that contribute to its development and continuous improvement, taking into account, where appropriate, the suggestions and proposals made by the professionals of the Group companies.

6. REPORTING NON-COMPLIANCE AND DISCIPLINARY REGIME

If any employee of the Group companies becomes aware of, or has reasonable suspicions regarding, any form of non-compliance, they must report it immediately through the channel enabled in Grupo Fedola's internal information system. This channel is managed privately and in absolute confidence.

Grupo Fedola shall not tolerate any retaliation against anyone who, in good faith, reports facts that may constitute a breach of this policy or of any other policy in force within the company.

Non-compliance with this policy shall be considered a breach of the Group's internal rules and may be subject to disciplinary measures.

Likewise, the Group companies reserve the right to adopt such measures as they deem appropriate against business partners who fail to comply with it.

Grupo Fedola considers compliance with this policy to be the responsibility of all staff.

7. COMMUNICATION AND DISSEMINATION OF THE POLICY

Employees are informed of the existence of this policy through internal communication instruments.

The policy is available to all stakeholders in the corporate App, as well as in the Transparency Portal.