



## **ANTI-CORRUPTION POLICY**

| VERSION CONTROL |            |                     |                                                                                                         |
|-----------------|------------|---------------------|---------------------------------------------------------------------------------------------------------|
| VERSION         | DATE       | RESPONSIBLE PARTY   | REMARKS                                                                                                 |
| 1.0             | 18/05/2018 | Criminal Compliance | Definition and creation                                                                                 |
| 1.1             | 30/06/2023 | Criminal Compliance | Review                                                                                                  |
| 1.2             | 17/04/2024 | Criminal Compliance | Review                                                                                                  |
| 1.3             | 10/02/2025 | Criminal Compliance | Review and inclusion of the new provisions introduced by Law 2/2023 on the Protection of Whistleblowers |
|                 | 19/12/2025 | Criminal Compliance | Amendment of the scope of application                                                                   |

The following is a translation of this policy provided for informational purposes only. In the event of any discrepancy or inconsistency, the Spanish version shall prevail and be considered the sole legally valid and binding text.

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The Board of Directors of Grupo Fedola is entrusted with the responsibility of designing, evaluating and continuously reviewing the Governance and Sustainability System and, specifically, approving and updating corporate policies, which establish the guidelines governing the conduct of the companies forming part of the Group.

### **1. PURPOSE**

The purpose of this policy is to reaffirm Grupo Fedola's commitment to strict compliance with legislation aimed at preventing and combating corruption (offering, promising, granting, receiving, requesting or accepting an unjustified benefit, for oneself or for a third party, in order to improperly favour another party in the acquisition or sale of goods, the contracting of services, or commercial 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 LEGISLATION**

- Organic Law 10/1995 of 23 November, Spanish Criminal Code.
- Law 38/2003 of 17 November, General Subsidies Act.
- Royal Decree 91/2019 of 1 March, regulating the composition and operation of the Advisory Council for the Prevention and Fight against Fraud Affecting the Financial Interests of the European Union.
- Law 2/2023 of 20 February, on the Protection of Persons Reporting Regulatory Breaches and on Combating Corruption.

### **3. SCOPE OF APPLICATION**

This policy applies to all autonomous and legally independent companies (whether currently existing or established in the future) that form part of the "Grupo Fedola" business group.

For the purposes of this policy, "Grupo Fedola" or the "Group" shall mean all the independent companies comprising the Group, to which this policy applies:

GRUPO FEDOLA, S.L.; PREFABRICADOS TEIDE, S.L.; FERRETERÍA 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.; AGRO INNOVACIÓN FEDOLA, 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 and applies a zero-tolerance approach to any breach of this policy.

In order to prevent corruption, Grupo Fedola shall conduct all its activities in accordance with the legislation in force in all areas of operation, respecting both its spirit and purpose, and undertakes to:

- Not seek to influence the will or objectivity of persons outside the company in order to obtain any benefit or advantage through unethical practices and/or practices contrary to applicable law.
- Not give, promise or offer, directly or indirectly, anything of value (cash or cash equivalents, gifts, loans, gratuities, advantages or benefits of any kind) to any natural or legal person for the purpose of obtaining improper advantages for the company.
- Not permit any facilitation payment (a small payment made to junior public officials intended to expedite or facilitate the performance of their duties, such as access to public services, obtaining routine licences or business permits, administrative procedures, police protection, or the loading and/or unloading of goods).
- Not finance, support or otherwise assist, directly or indirectly, any political party, its representatives or candidates.
- Not use donations to conceal improper payments.
- Not improperly request or receive, directly or indirectly, commissions, payments or benefits from third parties in connection with, or arising from, investment, divestment, financing or expenditure transactions carried out by the company.
- Pay particular attention to situations where there are indications of a lack of integrity on the part of individuals or entities with whom business is conducted, in order to ensure that Grupo Fedola establishes commercial relationships only with qualified persons and entities of good repute.
- Accurately and appropriately record all company actions, operations and transactions in its books and records.
- Promote internal training on the prevention of and fight against corruption.

## **5. REVIEW**

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

## **6. REPORTING BREACHES AND DISCIPLINARY MEASURES**

If any employee of the Group's companies becomes aware of or has reasonable grounds to suspect any form of non-compliance, they must immediately report it through the channel established within Grupo Fedola's Internal Information System. This channel is managed privately and with absolute confidentiality.

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

Failure to comply with this policy shall be considered a breach of the Group's internal rules and may result in disciplinary measures. Likewise, the Group's companies reserve the right to take any measures 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 personnel.

## **7. COMMUNICATION AND DISSEMINATION OF THE POLICY**

Employees are informed of the existence of this policy through the Group's internal communication channels.

This policy is available to all stakeholders through the corporate App and the Transparency Portal.