



VERSION CONTROL			
VERSION	DATE	RESPONSIBLE PARTY	REMARKS
1.0	08/09/2025	Criminal Compliance	Definition and content of the Policy
	30/09/2025	Board of Directors	Approval
	19/12/2025	Criminal Compliance	Review and 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 responsible for designing, evaluating and continuously reviewing the Governance and Sustainability System and, specifically, for approving and updating corporate policies, which establish the guidelines governing the conduct of the companies forming part of the Group. The purpose of this document, addressed to all stakeholders, is to establish the guidelines, principles and criteria that guide the Company's actions in relation to the circular economy.

I. DEFINITION OF THE CIRCULAR ECONOMY

The circular economy is a model of production and consumption that involves sharing, leasing, reusing, repairing, refurbishing and recycling existing materials and products for as long as possible in order to create added value. In this way, the life cycle of products is extended. In practice, this means reducing waste to a minimum. When a product reaches the end of its life, its materials are kept within the economy whenever possible through recycling. These materials can then be used productively again and again, thereby creating additional value.

II. OBJECTIVE

The growth in global demand for resources in recent decades has significantly intensified their consumption, making it essential to move away from the traditional linear model — extract, produce, consume and dispose — towards a sustainable model based on reducing, reusing and recycling.

The circular model seeks to optimise the use of resources to the greatest extent possible and minimise waste generation by extending the useful life of materials and products through their reintegration into the value chain at the end of their consumption cycle.

Aware of its responsibility, Grupo Fedola recognises that the transition towards this new paradigm will only be possible through the active participation of all social stakeholders. It therefore undertakes to contribute decisively to sustainable development by reducing the environmental impact of its activities and promoting actions that reinforce this objective.

Through this Policy, Grupo Fedola reaffirms its commitment to integrating the circular economy into its management model, incorporating it across all levels of the organisation in order to promote responsible and sustainable growth.

III. 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.

IV. GUIDING PRINCIPLES

In order to put into practice the circular economy model underpinning this Policy, Grupo Fedola and all its companies adopt the following principles:

- a)** Integrate the circular economy into business strategy and decision-making processes.
- b)** Comply with the waste management hierarchy: prevention, reduction, reuse, recycling, recovery and, as a last resort, disposal.
- c)** Minimise the use of non-renewable natural resources and introduce materials derived from waste into production cycles as secondary raw materials.
- d)** Prioritise the purchase of recycled products.
- e)** Promote the purchase of materials and products designed to be reused or recycled at the end of their useful life.
- f)** Encourage eco-design throughout all stages of the life cycle of products and services.
- g)** Promote resource efficiency by optimising processes, supporting low-emission energy sources and using efficient technologies.
- h)** Implement measures to prevent food waste.
- i)** Support innovation in processes and projects that promote circularity.
- j)** Develop awareness-raising, training and educational initiatives for all stakeholders in this area.
- k)** Maintain continuous and transparent communication regarding actions undertaken in relation to the circular economy.
- l)** Participate in agreements, partnerships and collaborations — whether public or private — that enable commitments and actions aligned with the objectives defined herein.

- m)** Ensure that waste management is carried out by authorised companies and in compliance with current legislation, guaranteeing appropriate treatment.
- n)** Comply at all times with applicable legislation and, where an adequate legal framework does not exist, follow standards, guidelines and commitments related to the circular economy.

V. APPROVAL AND EFFECTIVE DATE

Following its presentation to the Management Committee on 15 September 2025, this Policy was approved by the Board of Directors of Grupo Fedola at its meeting held on 30 September 2025, entering into force on the following day.

This Policy shall remain in force until otherwise communicated, with any withdrawal being announced through the appropriate channels to ensure effective communication.

The Policy shall be reviewed and updated on a continuous basis in order to adapt it to any changes that may arise and affect its underlying principles.

Santa Cruz de Tenerife, 30 September 2025

Grupo Fedola Management

Signed: Ana Belén López Fuentes
Vice-Chairwoman of Grupo Fedola

El modelo de economía circular:
menos materias primas, menos residuos, menos emisiones



Fuente: Servicio de Investigación del Parlamento Europeo

