



CONFLICT OF INTEREST POLICY

VERSION CONTROL			
VERSION	DATE	RESPONSIBLE PARTY	REMARKS
1.0	18/05/2020	Criminal Compliance	Definition and content of the policy
2.0	03/07/2023	Criminal Compliance	Review and update
2.1	18/04/2024	Criminal Compliance	Review
2.3	11/02/2025	Criminal Compliance	Review and inclusion of the new provisions introduced by Law 2/2023 on the Protection of Whistleblowers
	19/12/2025	Criminal Compliance	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 (hereinafter referred to as the “Group”) 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. GENERAL DEFINITION

Conflicts of interest are situations in which a person's judgement, in relation to a primary interest, and the integrity of their actions, may be unduly influenced by a secondary interest, which is frequently of a personal or financial nature.

2. 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.

3. SITUATIONS GIVING RISE TO A CONFLICT OF INTEREST OR BUSINESS OPPORTUNITY

1. General Rules

Employees of Grupo Fedola companies shall always act in such a way that their personal interests, those of their relatives, or those of any persons connected with them do not prevail over the interests of the company or its clients.

This principle of conduct shall apply both to relationships between employees and the company itself, and to relationships maintained with the company's clients, suppliers or any other third parties.



2. Relationship with Other Companies within the GRUPO FEDOLA Business Group

1. Employees may maintain customer relationships with the various entities within Grupo Fedola, provided that such relationships are consistent with the corporate purpose of the respective entity and are conducted under normal market conditions (or under conditions generally established for employees).

In this regard, the Human Resources and Criminal Compliance functions shall ensure the transparency of the transaction and equal access for other interested parties, as well as ensuring that the transaction is conducted under market conditions and does not constitute a conflict of interest or involve access to or use of privileged information.

2. Employees shall refrain from participating, whether in decision-making processes or in representative functions on behalf of the company, in any transaction carried out by the company in which they, or any person connected with them, have a personal interest.

Accordingly:

a) They shall neither participate in nor influence procedures relating to the procurement of products or services from companies or individuals with whom the employee has any financial or family connection.

b) They shall not provide special treatment or special working conditions based on personal or family relationships.

4. 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 professional teams of the Group's companies.



5. 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.

6. 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.



ANNEX TO THE EMPLOYMENT CONTRACT

ANTI-CORRUPTION CLAUSE REGARDING CONFLICTS OF INTEREST

The employee signing this annex to the employment contract expresses their absolute rejection of any form of corrupt or criminal practice, even where such conduct may generate significant benefits for the company.

The employee also acknowledges and accepts the obligation to inform their superiors of any situation involving a conflict of interest as soon as it arises, or whenever there is any doubt as to whether such a conflict may exist.

In Santa Cruz de Tenerife, on the day of 20....

Employee Name:

Employee ID Number (DNI/NIE):

Employee Signature _____

Company Stamp _____