CSV POLICY

(COMPLIANCE SOFTWARE VALUE)

VERSION CONTROL			
VERSION	**DATE**	**RESPONSIBLE PARTY**	**REMARKS**
1.0	10/07/2023	Criminal Compliance	Creation and implementation
	18/04/2024	Criminal Compliance	Review
	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 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.

1. PURPOSE

This CSV Policy (Compliance Software Value) establishes the guidelines and principles that Grupo Fedola companies must follow in order to ensure the appropriate and ethical use of software, as well as respect for intellectual property rights Compliance with these guidelines is essential to promote legality, transparency and accountability in the use of software throughout the organisation.

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. APPLICABLE LEGISLATION

- -Royal Legislative Decree 1/1996 of 12 April, approving the consolidated text of the Intellectual Property Act, harmonising, clarifying and consolidating the legislation in this field.
- Organic Law 10/1995 of 23 November – Criminal Code (Articles 270 to 272, "Offences relating to Intellectual Property").

4. PRINCIPLES

1) Software shall only be acquired and used from legitimate and reliable sources, respecting the licences and terms of use established by software providers.Before acquiring or using software, its licensing status shall be **verified to ensure compliance with all legal and regulatory requirements.**

2) Software shall be used exclusively for its intended purposes and in accordance with the terms and conditions of the applicable licence. Unauthorised use, illegal copying, unauthorised distribution or any other activity that infringes intellectual property rights relating to software is strictly prohibited.

3) A process shall be established to ensure that software remains up to date with the latest versions and security patches. Appropriate measures shall be implemented to ensure that all updates and patches are applied promptly and correctly.
4) An up-to-date register shall be maintained of all software assets used within the organisation, including information relating to licences, suppliers and expiry dates. GF-TIC, S.L.U. shall be responsible for maintaining this register and verifying compliance with licensing requirements and the correct use of software.
5) Regular training shall be provided to employees regarding software compliance, the risks associated with unauthorised use, and the legal and ethical consequences of infringing intellectual property rights. A culture of compliance shall be promoted, and employees shall be encouraged to report any suspicious activity or breaches relating to software compliance.
6) Clear procedures shall be established for dealing with software compliance breaches, including the corresponding sanctions and disciplinary consequences. Any breach of software compliance requirements shall be taken seriously and addressed fairly and consistently.

5. RESPONSIBILITY

All employees are responsible for complying with this Policy and ensuring that software is used legally and ethically within the scope of their respective duties. Senior Management shall support and promote compliance with software value principles throughout the organisation.

6. REVIEW

The Criminal Compliance function shall periodically review the content of this Policy, ensuring that it reflects current recommendations and best practices. 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 companies.

7. REPORTING BREACHES AND DISCIPLINARY MEASURES

If any employee of the Group companies becomes aware of, or has reasonable grounds to suspect, any form of breach of this Policy, 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 companies reserve the right to adopt any measures they deem appropriate against business partners who fail to comply with this Policy.
Grupo Fedola considers compliance with this Policy to be the responsibility of all personnel.

8.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 interested parties through the corporate App and the Transparency Portal.