



GIFTS POLICY

VERSION CONTROL			
VERSION	DATE	RESPONSIBLE PARTY	REMARKS
1.0	29/05/2020	Criminal Compliance	Creation of the policy and definition of scope
2.0	02/12/2021	Criminal Compliance	Update of maximum gift value
3.0	17/11/2022	Criminal Compliance	Inclusion of general principles, scope, gift register, non-compliance, communication and dissemination of the policy, and version control. Creation of the Gift Form and Gift Register.
3.1	17/04/2024	Criminal Compliance	Review
3.2	10/02/2025	Criminal Compliance	Review and inclusion of the new provisions introduced by Law 2/2023 on the Protection of Whistleblowers
	15/01/2025	Criminal Compliance	Review and inclusion of gifts awarded through prize draws
	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.

INDEX

1. GENERAL PRINCIPLES	2
2. BASIC APPLICABLE LEGISLATION	2
3. SCOPE OF APPLICATION	2
4. DEFINITION OF A GIFT	3
5. GIFTS POLICY (LIMITS, AUTHORISATIONS AND PROHIBITED CONDUCT)	3
6. PROHIBITION ON GIVING OR ACCEPTING GIFTS FROM PUBLIC OFFICIALS..	4
7. GIFT REGISTER	5
8. REVIEW	5
9. REPORTING BREACHES AND DISCIPLINARY MEASURES	5
10. COMMUNICATION AND DISSEMINATION OF THE POLICY	6

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. GENERAL PRINCIPLES

Corruption is defined as bribery and any other conduct involving persons entrusted with responsibilities in the public or private sector that breaches the duties arising from their position or responsibility in order to obtain undue advantages for themselves or for third parties, whether through an offer, promise or reward (financial or otherwise).

Accordingly, all persons associated with Grupo Fedola must be aware that gifts, hospitality, donations and similar benefits may be perceived by a third party as a bribe, even where neither the donor nor the recipient intended them to serve such a purpose.

Therefore, a useful and necessary control mechanism is to avoid, wherever possible, any gifts, hospitality, donations or similar benefits that could be perceived as having the aforementioned purpose.

2. BASIC APPLICABLE LEGISLATION

- Article 424 of Organic Law 10/1995 of 23 November, Spanish Criminal Code.
- 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 employees, including persons holding management positions and members of governing bodies, as well as suppliers and collaborators of Grupo Fedola, and covers both individual and joint actions carried out by or on behalf of the Group.

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:

GIFTS POLICY

Page **4** of **8**



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.

This policy covers all activities, processes and relationships established by the Group and its employees at all levels, whether formally documented through contracts, policies, procedures or similar instruments, or applied through custom or established practice.

4. DEFINITION OF A GIFT

Any type of present, service, advantage, favour, gratuitous benefit, physical gift or monetary donation (including payments and commissions).

5. GIFTS POLICY (LIMITS, AUTHORISATIONS AND PROHIBITED CONDUCT)

1. It is expressly prohibited to give and/or accept any type of payment, gift, commission, present or remuneration in connection with any transaction or activity carried out by the company.
2. No employee of the company may request and/or accept any form of payment, commission, gift or remuneration relating to their professional activities within the company from customers, suppliers, intermediaries, counterparties or any other third party. The following are excluded from these restrictions:
 - a) Promotional items of nominal value (merchandise).
 - b) Gifts with a value of €150 or less.
 - c) Ordinary invitations that do not exceed the limits considered reasonable according to customary social and business courtesy practices.
 - d) Occasional gestures for specific and exceptional occasions (such as Christmas gifts), provided they are not cash gifts, remain modest and reasonable, and do not exceed a value of €150.
 - e) Exceptional gifts presented to Grupo Fedola employees in recognition of 25 years of service within the organisation.

GIFTS POLICY

Page **5** of **8**



- f) Gifts awarded by the company to employees through the prize draw held during the annual Christmas Party.

3. Except for the situations permitted above, employees must consult the Criminal Compliance function in advance regarding the appropriateness of giving and/or accepting gifts and invitations from third parties. Approval from the Criminal Compliance function is required before any such gift or invitation may be given or accepted. In addition, approval from the governing body of the relevant company is also required.

Accordingly, a two-tier approval process applies:

- First, authorisation from the Criminal Compliance function.
- Secondly, authorisation from the governing body of the relevant company.

4. Any invitation, gift or hospitality which, due to its frequency, characteristics or circumstances, could reasonably be interpreted by an objective observer as intended to influence the impartial judgement of the recipient shall be refused and reported to Grupo Fedola's Criminal Compliance function.

6. PROHIBITION ON GIVING OR ACCEPTING GIFTS FROM PUBLIC OFFICIALS

1. It is prohibited to provide, promise or offer any type of payment, commission, gift or remuneration to any authority, public-sector employee or member of the management of public companies or public bodies, whether directly or indirectly through associated persons or entities, and whether intended for the public official personally or for another person designated by them.

This prohibition applies to public-sector personnel in Spain as well as in any other country.

2. Such payments, promises or offers are prohibited whether made directly by any Grupo Fedola company or indirectly through partners, collaborators, agents, intermediaries, brokers, advisers or any other third parties acting on its behalf.

3. The following are excluded from these restrictions relating to public officials: a) Promotional items of nominal value (merchandise).

b) Invitations to social, sporting or cultural events sponsored by Grupo Fedola or any of its companies.

GIFTS POLICY

Page **6** of **8**



4. Employees must refuse and report to the company's Criminal Compliance function any request made by public officials for payments, commissions, gifts or remuneration of the types referred to in paragraph 1 above.

7. GIFT REGISTER

In order to ensure transparency in all areas of activity, every gift that is accepted, offered, given or declined must be recorded in the "Gift Register", with the exception of promotional items, merchandise and business meals.

The Criminal Compliance function shall be responsible for maintaining the register and ensuring it remains up to date. Employees who receive or give a gift are responsible for completing the corresponding form.

The register includes the following fields, all of which must be properly completed:

- Registration Number
- Date of receipt of the form
- Received or Offered
- Sender (name and position)
- Recipient (name and position)
- Gift Description
- Estimated Value
- Reason
- Authorised

8. 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.

9. 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.

GIFTS POLICY

Page **7** of **8**



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.

10. COMMUNICATION AND DISSEMINATION OF THE POLICY

Employees are informed of the existence of this policy through the Group's internal communication channels. In addition, those responsible for each company shall be reminded annually of the existence and content of this policy.

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