



POLITICAL PARTIES POLICY



VERSION CONTROL			
VERSION	DATE	RESPONSIBLE PARTY	REMARKS
1.0	18/05/2020	Criminal Compliance	Definition and content of the policy
2.0	30/06/2023	Criminal Compliance	Review and update
	17/04/2024	Criminal Compliance	Review
	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	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. PURPOSE	2
2. BASIC APPLICABLE LEGISLATION	2
3. SCOPE OF APPLICATION	2
4. PERSONAL NATURE OF CONTRIBUTIONS.....	2
5. POLITICAL NEUTRALIT	3
6. USE OF COMPANY RESOURCES	3
7. EXTERNAL POLITICAL ACTIVITIES	3
8. CONFLICT OF INTEREST.....	3
9. FREEDOM OF OPINION AND NON-DISCRIMINATION	3
10. TRAINING AND AWARENESS	3
11. REVIEW	4
12. REPORTING BREACHES AND DISCIPLINARY MEASURES	4
13. COMMUNICATION AND DISSEMINATION OF THE POLICY	4

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 establish the guidelines and regulations relating to employees' membership of and participation in political parties within the workplace. Its objective is to safeguard employees' rights, promote an inclusive working environment and prevent conflicts of interest that may affect the performance and reputation of the company.

2. BASIC APPLICABLE LEGISLATION

- Spanish Constitution.
- Royal Legislative Decree 2/2015 of 23 October, approving the consolidated text of the Workers' Statute.
- Organic Law 6/2002 of 27 June on Political Parties.
- Organic Law 3/2007 of 22 March on Effective Equality between Women and Men.
- Law 31/1995 of 8 November on the Prevention of Occupational Risks.

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. PERSONAL NATURE OF CONTRIBUTIONS

Membership of, affiliation with, or collaboration with political parties or any other entities, institutions or associations pursuing public-interest objectives or objectives beyond those of Grupo Fedola, as well as contributions or services provided to them, must be undertaken in a manner that clearly demonstrates their personal nature and avoids any involvement of Grupo Fedola.

5. POLITICAL NEUTRALITY

Grupo Fedola is committed to maintaining a position of political neutrality and shall neither favour nor discriminate against any employee on the basis of their political affiliation or participation in political parties. All employees have the right to maintain their personal political beliefs, provided that these do not interfere with their work performance or breach company policies.

6. USE OF COMPANY RESOURCES

Employees must not use company resources, whether materials, time or information, for activities related to political parties without the express authorisation of Senior Management. This includes the use of company equipment, corporate email accounts, social media platforms and any other resources owned by the company.

7. EXTERNAL POLITICAL ACTIVITIES

All employees have the right to participate in political activities outside working hours and away from company premises. However, they must ensure that their conduct and actions remain within legal and ethical boundaries. Furthermore, they must not engage in political activities that could adversely affect the company's reputation or commercial interests.

8. CONFLICT OF INTEREST

Employees must avoid any conflict of interest that may arise between their political activities and their professional responsibilities. Before accepting any public office or public appointment, employees of the Group must notify their direct manager, the Human Resources Department and the Criminal Compliance function of the company, so that any incompatibilities or restrictions relating to such position can be assessed.

9. FREEDOM OF OPINION AND NON-DISCRIMINATION

Grupo Fedola respects and values the diversity of opinions and political beliefs held by its employees. No reprisals shall be taken against, nor shall any person be discriminated against because of, their personal political beliefs or affiliation with a political party. Freedom of expression and respectful dialogue are encouraged within the workplace, provided that company policies are not breached and the working environment is not adversely affected.

10. TRAINING AND AWARENESS

The company undertakes to provide information regarding this policy, as well as the general principles of political neutrality and ethical conduct.

In addition, all employees are encouraged to familiarise themselves with the relevant laws and regulations concerning political participation and conflicts of interest.

11.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.

12. 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.

13. 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.