SUSTAINABILITY POLICY

VERSION CONTROL			
VERSION	**DATE**	**RESPONSIBLE PARTY**	**REMARKS**
1.0	14/11/2024	Sustainability	Drafting
	30/09/2025	Board of Directors	Approval
	26/05/2026	Sustainability	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.

CONTENTS

1. INTRODUCTION

Grupo Fedola is the parent company of a holding group with 100% family-owned Canary Islands capital, comprising 16 companies and more than thirty commercial brands operating across the main economic sectors of the Canary Islands. All companies are independent and maintain their own tax and accounting structures. Each company has its own development strategy, which must be presented to the Board of Directors of Grupo Fedola for approval.

The Group provides a range of centralised shared services, including administration, financial management, legal services, auditing, marketing and communications, human resources and talent management, innovation and information systems, and sustainability.

Grupo Fedola assigns sustainability its true strategic dimension within the overall management of resources. The Group is convinced that business health can only be achieved through a balance between economic, social and environmental results. For this reason, the company's corporate culture is aligned with the 17 Sustainable Development Goals (SDGs) promoted by the United Nations Global Compact.

The commitment undertaken by Grupo Fedola through this Policy is to meet present needs without compromising the ability of future generations to meet theirs, not only through legal compliance but also by seeking alternatives and solutions that contribute to the well-being of the social, environmental and financial environment.

2. PURPOSE AND SCOPE OF APPLICATION

The purpose of this Policy is to establish Grupo Fedola's commitment and fundamental principles regarding sustainability throughout its business model and to serve as a reference framework for decision-making and actions, recognising their impact on the environment, value creation, stakeholder expectations and contribution to sustainable development through ethical, transparent and responsible behaviour.

This Sustainability Policy applies to all personnel of Grupo Fedola, including employees of the other companies forming part of the Group for accounting consolidation purposes and over which the company exercises management control. This Policy shall also apply to any future companies that may be established within Grupo Fedola. 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.

Persons acting in the name of or on behalf of Grupo Fedola, even where they do not form part of its organisation, undertake to act in accordance with this Policy whenever they act in the name of, on behalf of, or for the account of the entity, and commit themselves to extending these principles throughout the value chain.

This Policy serves as the framework establishing the principles that guide the organisation's sustainable actions in environmental, social and governance matters and is complemented by other Group policies addressing specific issues, such as anti-corruption, human rights, good governance, gender equality and related matters.

3. PRINCIPLES OF ACTION AND COMMITMENTS

In recent years, Grupo Fedola has successfully steered the management of its companies towards a more conscious approach to the environment. The Group promotes actions aimed at reducing greenhouse gas emissions, participates in environmental awareness and educational programmes, and seeks partnerships with companies and institutions that share common goals of respect for the planet.

As an essential part of its Corporate Social Responsibility, the Group actively and voluntarily engages with the communities in which it operates as well as with wider external environments.

Sustainability also requires access to economic and financial resources while maintaining independence in decision-making.

Another strategic and sustainable vision of the Group is its determination always to maintain a presence in the three major economic sectors:

- **Primary sector:** activities that obtain raw materials from the natural environment.
- **Secondary sector:** activities involving the transformation of raw materials.
- **Tertiary sector:** activities that provide services.

Within Grupo Fedola, relationships between governance bodies are established and the rules governing decision-making processes are defined in order to create value, foster business growth and promote the efficient and effective use of resources, as well as transparent and ethical management.

a. Principles of Action

The sustainability principles on which Grupo Fedola is founded are as follows:

- Ensuring economic viability and sustainability, generating value both for the Group and for its stakeholders.
- Strengthening the Group's capacity to become increasingly sustainable through partnerships and collaborations that promote business development, innovation and technology for sustainable development.
- Promoting respect for and preservation of the economic, social and environmental environment in the performance of the Group's activities, going beyond strict legal requirements.
- Integrating sustainability into all business areas and organisational levels, with environmental, social and governance aspects as fundamental pillars.
- Promoting continuous improvement in order to innovate and adapt to change.
- Ensuring transparency and accountability in sustainability matters through economic, social and environmental indicators.
- Contributing directly to regional, national and international action plans promoted by the United Nations through the Sustainable Development Goals (SDGs) and the achievement of the targets established in the 2030 Agenda.
- Creating value through the three fundamental principles established in the Good Governance Policy: transparency, sustainability and equality.

b. Commitments

To ensure the proper implementation of this Policy, Grupo Fedola undertakes the following commitments regarding environmental, social, governance and economic sustainability:

Environmental Commitments

- Establish ambitious greenhouse gas emission reduction targets in order to achieve long-term carbon neutrality.
- Implement energy efficiency measures and increase the use of renewable energy in operations.
- Minimise the environmental impact of facilities and operations by promoting the responsible use of resources and waste management.
- Incorporate circular economy principles into processes and products.
- Implement Management Systems wherever possible.

Social Commitments

- Respect and promote human rights through the implementation of due diligence processes.
- Foster diversity, inclusion and equal opportunities within the workplace.
- Guarantee safe and healthy working conditions for employees.
- Contribute to the development of local communities in which the company operates.
- Promote ethical and transparent business practices throughout the value chain.
- Establish employee development and well-being programmes.

Governance Commitments

- Integrate sustainability criteria into decision-making processes and business strategy.
- Establish corporate governance mechanisms that ensure ethical and responsible management.
- Implement risk management systems that include Environmental, Social and Governance (ESG) aspects.
- Promote transparency through the disclosure of relevant non-financial information.
- Encourage dialogue and collaboration with stakeholders on sustainability matters.
- Continue creating value through the principles established in the Good Governance Policy, following the corporate principles of "We Do, We Dream and We Believe."

Economic Commitments

- Develop innovative products and services that contribute to sustainability.
- Integrate sustainability criteria into supply chain management.
- Measure and manage the social and environmental impact of business activities from an economic perspective.
- Align investments and financial operations with sustainability objectives.
- Contribute to the achievement of the United Nations Sustainable Development Goals (SDGs).

4. PUBLICITY AND DISSEMINATION

This Policy shall be made available to stakeholders on the Grupo Fedola website for information and consultation purposes. Once approved, it shall be communicated through the existing channels to ensure its understanding and application by all persons within its scope of application.

5. APPROVAL AND VALIDITY

Following its presentation to the Management Committee on 23 December 2024, 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, and any withdrawal shall be 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 affect its underlying principles.

Santa Cruz de Tenerife, 30 September 2025

Grupo Fedola Management

Signed: Ana Belén López Fuentes

Vice-Chairwoman of Grupo Fedola

6. SUMMARY SUSTAINABILITY POLICY

Grupo Fedola assigns sustainability its true strategic dimension within the overall management of resources. The Group is convinced that business health can only be achieved through a balance between **economic, social and environmental results**. For this reason, our corporate culture is aligned with the **17 Sustainable Development Goals (SDGs)** promoted by the **United Nations Global Compact**.

The commitment undertaken by Grupo Fedola through this Policy is to meet present needs without compromising the ability of future generations to meet theirs, not only through legal compliance but also by seeking alternatives and solutions that contribute to the well-being of the social, environmental and financial environment.

PRINCIPLES OF ACTION

- Ensuring economic viability and sustainability, generating value both for the Group and for its stakeholders.
- Strengthening the Group's capacity to become increasingly sustainable through partnerships and collaborations that promote business development, innovation and technology for sustainable development within the sector and the wider environment.
- Promoting respect for and preservation of the economic, social and environmental environment in the performance of the Group's activities, going beyond strict legal requirements.
- Integrating sustainability into all business areas and organisational levels, with environmental, social and governance aspects as fundamental pillars.
- Promoting continuous improvement in order to innovate and adapt to change.
- Ensuring transparency and accountability in sustainability matters through economic, social and environmental indicators.
- Contributing directly to regional, national and international action plans promoted by the United Nations through the **Sustainable Development Goals (SDGs)**, thereby helping to achieve the targets established in the **2030 Agenda**.
- Creating value through the three fundamental principles established in the **Good Governance Policy**: **transparency, sustainability and equality**.

COMMITMENTS

Environmental Commitments

- Establish ambitious greenhouse gas emission reduction targets in order to achieve long-term carbon neutrality.
- Implement energy efficiency measures and increase the use of renewable energy in operations.
- Minimise the environmental impact of facilities and operations by promoting the responsible use of resources and waste management.
- Incorporate circular economy principles into processes and products.
- Implement Management Systems wherever possible.

Social Commitments

- Respect and promote human rights through the implementation of due diligence processes.
- Foster diversity, inclusion and equal opportunities within the workplace.
- Guarantee safe and healthy working conditions for employees.
- Contribute to the development of local communities in which the company operates.
- Promote ethical and transparent business practices throughout the value chain.
- Establish employee development and well-being programmes.

Governance Commitments

- Integrate sustainability criteria into decision-making processes and business strategy.
- Establish corporate governance mechanisms that ensure ethical and responsible management.
- Implement risk management systems that include **Environmental, Social and Governance (ESG)** aspects.
- Promote transparency through the disclosure of relevant non-financial information.
- Encourage dialogue and collaboration with stakeholders on sustainability matters.
- Continue creating value through the principles established in the **Good Governance Policy**, following the corporate principles of **"We Do, We Dream and We Believe."**

Economic Commitments

- Develop innovative products and services that contribute to sustainability.
- Integrate sustainability criteria into supply chain management.
- Measure and manage the social and environmental impact of business activities from an economic perspective.
- Align investments and financial operations with sustainability objectives.
- Contribute to the achievement of the United Nations Sustainable Development Goals (SDGs)

Version 1.0

Approved by the Board of Directors of Grupo Fedola on 30 September 2025