



Grupo
fedola

**POLITICAL PARTIES
POLICY**

GRUPO FEDOLA

GF-JURIDICO

VERSION CONTROL

VERSION	DATE	RESPONSIBLE	COMMENTS
1.0	18/05/2020	Criminal Compliance	Scope and content of the policy
2.0	30/06/2023	Criminal Compliance	Review and update
2.0	17/04/2024	Criminal Compliance	Review
2.0	06/11/2024	Criminal Compliance	Review and adaptation to inclusive language

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The Board of Directors of Grupo Fedola is entrusted with the authority to design, assess, and permanently review the governance and sustainability system and, specifically, to approve and update corporate policies, which contain the guidelines governing the actions of the companies integrated into the Group.

1. OBJECTIVE

The purpose of this policy is to establish the guidelines and regulations related to employees' membership in and participation in political parties within the company's working environment. The aim is to safeguard employees' rights, promote an inclusive working environment, and avoid conflicts of interest that may affect the company's performance and reputation.

2. BASIC APPLICABLE REGULATIONS

- **Spanish Constitution.**
- **Royal Legislative Decree 2/2015, of 23 October, approving the revised text of the Workers' Statute Law.**
- **Organic Law 6/2002, of 27 June, on Political Parties.**
- **Organic Law 3/2007, of 22 March, for the effective equality of women and men.**
- **Law 31/1995, of 8 November, on Occupational Risk Prevention.**

3. SCOPE OF APPLICATION

This policy applies to all companies that form part of the Group and over which it has effective control, within the legally established limits.

For the purposes of this policy, **Grupo Fedola** or **the Group** shall be understood as all the companies that form part of it and to which this policy shall apply:

GRUPO FEDOLA, S.L.; PREFABRICADOS TEIDE, S.L.; FERRETERIA 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.; 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

Any connection, membership, or collaboration with political parties or with other types of entities, institutions, or associations with public purposes or purposes

beyond those of Grupo Fedola, as well as contributions or services to them, must be carried out in such a way that their personal nature is clear and any involvement of Grupo Fedola is avoided.

5. POLITICAL NEUTRALITY

Grupo Fedola undertakes to maintain a position of political neutrality and shall neither favour nor discriminate against any employee on the basis of their affiliation with or participation in political parties. Everyone has the right to maintain their personal political beliefs, provided that these do not interfere with their work performance or violate 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, social media, and any other resource owned by the company.

7. EXTERNAL POLITICAL ACTIVITIES

Everyone has the right to participate in external political activities outside working hours and outside company premises. However, they must bear in mind that their conduct and actions must remain within legal and ethical limits. Likewise, they must not engage in political activities that may negatively affect the company's reputation or business interests.

8. CONFLICT OF INTEREST

Employees must avoid any conflict of interest that may arise between their political activities and their work responsibilities. Before accepting any public office, Group employees must inform their direct manager, the Human Resources department, and the company's Criminal Compliance function, in order to determine whether any incompatibilities or restrictions exist regarding the exercise of such office.

9. FREEDOM OF OPINION AND NON-DISCRIMINATION

Grupo Fedola respects and values the diversity of opinions and political beliefs of its employees. No reprisals shall be taken, nor shall anyone be discriminated against, because of their personal political beliefs or their affiliation with a political party. Freedom of expression and respectful dialogue are encouraged within the

workplace, provided that company policies are not infringed and the working environment is not harmed.

10. TRAINING AND AWARENESS

The company undertakes to provide information about this policy, as well as about the general principles of political neutrality and ethical conduct. In addition, all employees are encouraged to familiarise themselves with the relevant laws and regulations related to political participation and conflicts of interest.

11. REVIEW

Criminal Compliance shall periodically review the content of the policy, ensuring that it reflects the recommendations and best practices in force at any given time, and shall propose to the Board of Directors any amendments and updates that contribute to its development and continuous improvement, taking into account, where appropriate, the suggestions and proposals made by the professional teams of the Group companies.

12. REPORTING NON-COMPLIANCE AND DISCIPLINARY REGIME

If any employee of the Group companies becomes aware of, or has reasonable suspicions regarding, any form of non-compliance, they must report it immediately through the channel enabled in Grupo Fedola's internal information system. This channel is managed privately and in absolute confidence.

Grupo Fedola shall not tolerate any retaliation against anyone who, in good faith, reports facts that may constitute a breach of this policy or of any other policy in force within the company.

Non-compliance with this policy shall be considered a breach of the Group's internal rules and may be subject to disciplinary measures.

Likewise, the Group companies reserve the right to adopt such measures as 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 staff.

13. COMMUNICATION AND DISSEMINATION OF THE POLICY

Employees are informed of the existence of this policy through internal communication instruments.

The policy is available to all stakeholders in the corporate App, as well as in the Transparency Portal.