



Grupo
fedola

GIFTS POLICY

GRUPO FEDOLA

GF-JURIDICO

VERSION CONTROL

VERSION	DATE	RESPONSIBLE	COMMENTS
1.0	29/05/2020	Criminal Compliance	Creation and definition of the policy
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, version control. Creation of the gift form and the gift register.
3.0	17/04/2024	Criminal Compliance	Review
3.0	06/11/2024	Criminal Compliance	Review and adaptation to inclusive language

INDEX

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

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. GENERAL PRINCIPLES

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

For this reason, all persons connected with Grupo Fedola must be aware that gifts, hospitality, donations, and similar benefits may be perceived by a third party as bribery, even where the donor or recipient had no intention that they should serve such a purpose. Therefore, a useful and necessary control mechanism consists of avoiding, as far as possible, any gift, hospitality, donation, or other similar benefit that could be perceived as serving the above-mentioned purposes.

2. BASIC APPLICABLE REGULATIONS

- **Article 424 of Organic Law 10/1995, of 23 November, on the Criminal Code.**
- **Law 2/2023, of 20 February, regulating the protection of persons who report regulatory infringements and the fight against corruption.**

3. SCOPE

This policy applies to all employees, including persons holding management positions and members of the governing body, as well as suppliers and collaborators of Grupo Fedola, and refers both to individual and joint actions carried out by or on behalf of the Group.

It applies to all Grupo Fedola companies, including subsidiaries and temporary joint ventures in which the Group may have a controlling interest.

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

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.

This policy shall cover all activities, processes, and relationships established by the Group and by employees at all levels, whether formally documented by means of a contract, policy, procedure, or similar instrument, or applicable through custom or usual practice.

4. DEFINITION OF GIFT

Any type of gift, service, advantage, favour, arrangement free of charge, or any other physical present or monetary donation (**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 operation or action carried out by the company.

2. No employee of the company may request and/or accept any type of payment, commission, gift, present, or remuneration in connection with their professional activity in the company and coming from clients, suppliers, intermediaries, counterparties, or any other third party.

The following are **not** included within these restrictions:

- a) Promotional items of low value (**merchandising**)
- b) Gifts with a value equal to or less than **150 euros**
- c) Ordinary invitations that do not exceed the limits considered reasonable according to customary, social, and courtesy practices in business relationships
- d) Occasional courtesies for specific and exceptional reasons (**such as Christmas gifts**), provided that they are not cash, are within modest and reasonable limits, and do not exceed **150 euros** in value
- e) Exceptional gifts or courtesies to Grupo Fedola employees on the occasion of completing **25 years** within the business organisation
- f) Gifts given by the company to employees through the draw held on the occasion of the **“Christmas Party”**

3. Except for the cases permitted in the previous section, employees must consult Criminal Compliance in advance regarding the appropriateness of giving and/or accepting gifts and invitations from third parties, and its authorisation shall be required for the giving or acceptance of the relevant item or invitation. Likewise, the

approval of the governing body of each company shall also be necessary. Therefore, this involves a **two-level control process**:

- **first, authorisation from Criminal Compliance**
- **and then, authorisation from the governing body of the relevant company**

4. Any invitation, gift, or courtesy which, due to its frequency, characteristics, or circumstances, could be interpreted by an objective observer as having been made with the intention of affecting the impartial judgement of the recipient, shall be rejected and reported to Grupo Fedola's Criminal Compliance.

6. PROHIBITION ON GIVING OR ACCEPTING GIFTS FROM PERSONNEL SERVING THE PUBLIC ADMINISTRATION

1. It is prohibited to deliver, promise, or offer any kind of payment, commission, gift, or remuneration to any authority, public sector employee, or members of the management of public companies or bodies, whether directly to them or indirectly through persons or entities connected to them, and whether addressed to the public sector person themselves or to another person designated by them. This prohibition applies both to public sector personnel in Spain and in any other country.

2. Such deliveries, promises, or offers are prohibited whether made directly by any company of Grupo Fedola or indirectly through partners, collaborators, agents, intermediaries, brokers, advisers, or any other intermediaries.

3. The following are **not** included in this restriction regarding personnel serving the public administration:

- a) Promotional items of low value (**merchandising**)
- b) Invitations to social, sports, or cultural events sponsored by Grupo Fedola, or by any of its companies

4. Employees must reject and report to the company's Criminal Compliance any request from personnel serving the public administration for payments, commissions, gifts, or remunerations of the kind mentioned in point 1 above.

7. GIFT REGISTER

In order to guarantee transparency in all areas of activity, every gift that is accepted, offered, made, or rejected must be recorded in a "**Gift Register**", with the exception of promotional items or merchandising and business meals.

Criminal Compliance shall be responsible for keeping the register up to date, and it shall be the obligation of the employee who receives or gives the gift to complete the corresponding form.

The register includes the following fields, which must be duly completed:

- **Registration Number**
- **Date of receipt of the form**
- **Received or offered**
- **Sender (name and position)**
- **Recipient (name and position)**
- **Concept/Description of the gift**
- **Estimated value**
- **Reason**
- **Authorised**

8. 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.

9. 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.

10. COMMUNICATION AND DISSEMINATION OF THE POLICY

Employees are informed of the existence of this policy through internal communication instruments. Likewise, the persons responsible for each company shall be reminded annually of the existence of the policy and its content.

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