



Grupo
fedola

CONFLICT OF INTEREST 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	03/07/2023	Criminal Compliance	Review and update
	18/04/2024	Criminal Compliance	Review
	06/11/2024	Criminal Compliance	Review and adaptation to inclusive language

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The Board of Directors of **Grupo Fedola** (hereinafter, the “**Group**”) 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 DEFINITION

Conflicts of interest are those situations in which a person’s judgement, in relation to a primary interest for them, and the integrity of their actions, tend to be improperly influenced by a secondary interest, which is often of an economic or personal nature.

2. 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.

3. SITUATIONS IN WHICH A CONFLICT OR BUSINESS OPPORTUNITY ARISES

1. General rules

Employees of the companies within **Grupo Fedola** shall always act in such a way that their personal interests, those of their relatives, or those of other persons connected to them do not take precedence over those of the company or its clients.

This rule of conduct shall apply both in employees’ relations with the company itself and in the relations they maintain with its clients, suppliers, or any other third party.

2. Relationship with the other companies of the GRUPO FEDOLA business group

1. Employees may maintain customer relationships with the various entities of **Grupo Fedola**, provided that these are typical of the corporate purpose of the respective entity and under market conditions (**or under conditions generally established for employees**).

In this regard, the **Human Resources** and **Criminal Compliance** functions shall ensure the transparency of the transaction and equal access for other interested persons, as well as that it is carried out under market conditions and does not constitute a conflict of interest or possible access to or use of privileged information.

2. Employees shall refrain from participating (**whether in decision-making or in functions representing the company**) in transactions of any kind carried out by the company in which they, or any related person, have a personal interest. Consequently:
 - a) They shall neither participate in nor influence procedures for the procurement of products or services from companies or persons with whom the employee has any economic or family connection.
 - b) They shall not give special treatment or working conditions based on personal or family relationships.

4. 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.

5. 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.

6. 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.

ANNEX TO THE EMPLOYMENT CONTRACT

ANTI-CORRUPTION CLAUSE AGAINST CONFLICTS OF INTEREST

The employee signing this annex to the employment contract expresses their absolute rejection of any type of corrupt or criminal practice, even if the company were to obtain significant benefits from it.

Likewise, the employee is aware of and accepts the obligation to inform their superiors of any situation involving a conflict of interest at the moment it arises, or whenever there is doubt as to whether it might arise.