



**NEW SOFTWARE COMPLIANCE  
POLICY**

GRUPO FEDOLA  
GF-JURIDICO

## VERSION CONTROL

VERSION	DATE	RESPONSIBLE	COMMENTS
1.0	10/07/2023	Criminal Compliance	Creation and implementation
	18/04/2024	Criminal Compliance	Review
	11/11/2024	Criminal Compliance	Review and adaptation to inclusive language

*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.*

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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. OBJECTIVE**

This **Software Compliance Policy** sets out the guidelines and principles that Grupo Fedola companies must follow in order to guarantee the proper and ethical use of software, as well as respect for intellectual property rights. Compliance with these guidelines is essential to promote legality, transparency, and responsibility in the use of software within the organisation.

## **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. APPLICABLE REGULATIONS**

- **Royal Legislative Decree 1/1996, of 12 April, approving the revised text of the Intellectual Property Law, regularising, clarifying, and harmonising the provisions in force on the matter.**
- **Organic Law 10/1995, of 23 November, on the Criminal Code (Articles 270 to 272, “Offences relating to intellectual property”).**

## **4. PRINCIPLES**

- a) Software shall only be acquired and used from legitimate and reliable sources, respecting the licences and usage agreements established by the suppliers. Before acquiring or using software, its licence shall be verified and it shall be ensured that it complies with legal and compliance requirements.

- b) Software shall be used exclusively for its intended purposes and in accordance with the terms and conditions of the licence. Unauthorised use, illegal copying, unauthorised distribution, or any other activity infringing intellectual property rights related to software is not permitted.
- c) A process shall be established to ensure that software is kept updated with the latest versions and security patches. Measures shall be implemented to ensure that all updates and patches are applied in a timely and appropriate manner.
- d) An up-to-date register shall be maintained of all software assets used within the organisation, including information on licences, suppliers, and expiry dates. **GF-TIC, S.L.U.** is the company responsible for maintaining this register and verifying compliance with licences and the proper use of software.
- e) Regular training shall be provided to employees on software compliance, the risks associated with unauthorised use, and the legal and ethical consequences of infringing intellectual property rights. A culture of compliance shall be fostered, and employees shall be encouraged to report any suspicious activity or software compliance breaches.
- f) Clear procedures shall be established to deal with breaches of software compliance, including the corresponding sanctions and disciplinary consequences. Any breach of software compliance shall be taken into consideration and addressed in a fair and consistent manner.

## **5. RESPONSIBILITY**

All employees are responsible for complying with this policy and ensuring that software is used lawfully and ethically in the performance of their respective duties. Senior management shall support and promote software compliance throughout the organisation.

## **6. 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.

## **7. 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.

## **8. 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**.