



Code of ethics

GROUP COMPANIES



1. MESSAGE

CHAIRMAN

Globalia is currently undergoing a process of significant and substantial changes that are ushering in a new era marked by major challenges and opportunities that respond to the expectations of today's society.

In this new cycle, we wish to make known our commitment and our intention as a Group that has always acted in accordance with the values and ethical principles that have enabled us to strengthen our corporate identity.

Through this Code of Ethics, we consolidate our corporate culture based on compliance with current legislation, demonstrating a firm commitment to our employees, suppliers, customers and society in general.

Nowadays, we encounter many situations that can hinder the performance of our duties and cause ethical dilemmas that we do not know how to deal with. That is why I am leading this change aimed at promoting immersion in a culture based on ethical principles and values. We must work to internalise them so that we can continue to show ourselves as the leading national tourism group that we are.

This Code of Ethics lays the foundations for a regulatory framework within Globalia and is therefore the general framework to be applied in the performance of each of our duties and responsibilities within the Group.

The Code of Ethics is a tool that allows us to unify and strengthen a single way of acting in each and every one of the companies and professionals that make up Globalia, based on principles and guidelines of conduct aimed at to guarantee ethical and responsible behaviour, which also includes the criminal prevention obligations established within the framework of criminal liability of legal persons.

Likewise, Globalia's management, committed to society and to the highest standards of compliance with the regulations that affect us, has implemented an Integrated Compliance Management System designed to ensure strict compliance with these regulations. Our Integrated Management System not only meets the requirements for criminal liability of legal entities, but is also based on international best practices and recognised standards, such as UNE/ISO compliance standards.

As a reflection of this commitment, Globalia has created an Ethics Channel through which we respond to all queries and concerns regarding conduct that may conflict with the principles and rules of conduct set out in this Code of Ethics, respecting at all times the principles of confidentiality, integrity and availability of information.

With all of the above, Globalia reaffirms its commitment to ethics, integrity in business and strict compliance with current legislation. Our goal is to strengthen our corporate culture and consolidate our position as a benchmark in compliance.

We are convinced that everyone's efforts to develop our values and build a solid reputation based on honesty and integrity will enable us to be a more successful company, generate value for our partners and thus strengthen the trust of our customers and society as a whole.

Globalia presents itself to its stakeholders as an honest, transparent, modern business group committed to society, reaffirming its dedication to acting with responsibility and excellence in all its activities.

I appreciate your involvement in continuing to develop our process of improvement and commitment to society.

Madrid, June 2025



Signed: Juan José Hidalgo


2. PURPOSE AND SCOPE

The Code of Ethics is a guide whose fundamental objective is to establish the values and principles that govern the way we work at Globalia, based on a commitment to compliance with principles and guidelines designed to ensure ethical and responsible behaviour. It also covers the new criminal prevention obligations established within the framework of criminal liability of legal persons.

It is therefore aimed at each and every employee of

Globalia, regardless of their position, responsibility or function within the company. It also applies to all persons with powers of representation and administration within the GROUP.

This Code of Ethics applies to all companies that make up Globalia, including subsidiaries and investee companies over which Globalia exercises effective control or holds a 50% or greater interest.



From a personal point of view, the Code of Ethics shall apply to all levels of Globalia, including administrative bodies, management positions and control bodies.

It shall also extend, as far as possible, to Globalia's suppliers, collaborators, contractors and customers.

From a geographical point of view, it shall apply to the activities carried out by Globalia in any geographical area, both locally and internationally.

3. MISSION, VISION AND VALUES OF ACTION

3.1

Mission and Vision

Our mission is to be the leading national tourism group in meeting customer satisfaction in a profitable manner and always in accordance with the principles of ethics and professionalism.

With the vision of collaborating and improving the economic and social progress of all the people we serve and interact with, providing our customers with service based on transparency and integrity.



3.2 Values

Values are the convictions that we at Globalia consider to be essential, as they determine our way of being, guide our culture and help us to improve:

·NORMALITY

We are committed to acting normally and treating our employees, customers and suppliers in accordance not only with the rules but also with our principles and corporate culture in order to achieve the objectives demanded by a modern society.

·HONESTY

Globalia's goal is for the people and entities that interact with us to perceive that we act with honesty, sincerity and consistency. This way of being, in addition to being profitable, is infinitely more solid and sustainable.





·ADAPTABILITY

Throughout our professional history, we have been a group that has known how to adapt to the circumstances of the society we serve and to customer demands. Today, Globalia is very clear that the fundamental characteristic of our daily work is knowing how to read what society demands, not only what it needs, but also how it needs it, and responding with the necessary resources.

·TEAMWORK AND PROFESSIONALISM

We believe that improvement can only come from within and from all of us at Globalia. Our staff is the backbone of our group. Thanks to their experience, professionalism, knowledge and commitment to our values, we have become the leading tourism group in Spain. We encourage our employees to strive for excellence, promote equal opportunities and provide training so that our staff can develop their full potential.

· INTEGRITY

Globalia is an honest group that can be trusted and has respect for itself and the people who make it up. We are rigorous in our compliance with our principles and values, which enables us to remain firm in the commitments we have made.

·**LEADERSHIP:** As leaders in the tourism sector, we want to show how ethics and values make companies stronger. Our goal is to maintain, strengthen and improve this leadership every day.

·**TRANSPARENCY:** At Globalia, transparency is a fundamental pillar of our corporate culture, as it generates trust and peace of mind among our employees, our customers and everyone we interact with. We are committed to disseminating information, both internally and externally, in a truthful, accurate and clear manner, with a particular focus on ensuring the reliability of financial information.

4. RULES OF CONDUCT

The code incorporates basic guidelines of conduct that all employees must internalise as their own and ensure are upheld within the organization.

4.1 Preventing fraud, bribery and corruption

Globalia prohibits any action committed within its sphere of activity based on the abuse of power by persons in positions of authority that could alter the proper functioning of the Group. To this end, Globalia, as part of its commitment to comply with applicable laws and regulations, will establish adequate controls to ensure compliance with its tax obligations, establishing measures to ensure the integrity of its accounting and financial system.

Globalia ensures the traceability of its transactions, collections and payments, identifying the parties involved and establishing measures to prevent money laundering and terrorist financing.

It also expresses its commitment to work closely with internal audit units, external auditors and competent authorities, cooperating at all times with the Administration of Justice.

Similarly, it will not use misleading or false information for the purpose of obtaining subsidies or any other type of aid or advantage.

Globalia bases its relations with the public and private sectors, both national and international, on the principles of transparency and equal opportunities, rejecting any action aimed at gaining an advantage over its competitors based on illegal means. In this regard, Globalia has developed rules and policies on gifts and commercial incentives, the requirements and limits of which must be respected by all Globalia staff. Examples of this are the Anti-Corruption Policy, the Gifts and Invitations Policy and the Donations and Sponsorship Policy. In addition, Globalia will apply a protocol to verify the actual destination of funds allocated to donations, sponsorships and patronage. The process will be based on the principles of transparency, honesty and traceability.

4.2 Commitment to our employees

4.2.1 Occupational Health and Safety

Globalia is firmly committed to ensuring a safe working environment that avoids any risk to the health and physical integrity of its employees and complies with all safety specifications and specific regulations applicable to the sector. All levels of Globalia are committed to this objective, and each job position undergoes a prior risk assessment to identify the safety measures to be implemented in compliance with occupational risk prevention regulations. Similarly, training in occupational risk prevention is mandatory for all levels of the Group. Globalia's commitment in this regard has been recognised with the award of OHSAS 18001 certification for some of its divisions.

Globalia staff are prohibited from handling, transferring or collaborating in the transport of any substance or item that could constitute a criminal offence.

In addition, Globalia monitors its suppliers, contractors and, in general, all its collaborators, promoting the adoption of advanced practices in occupational health and safety.

4.2.2 Human Rights

It is essential for Globalia to adopt a responsible ethical approach that is reflected in the following aspects:

- Comply with current legislation in each and every country where it operates, adopting international standards where there is no legal framework. The regulatory instruments taken as a reference include national and international legislation, the Universal Declaration of Human Rights, the principles enshrined in the United Nations Global Compact, the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy, and the OECD Guidelines for Multinational Enterprises.

- Human rights shall be respected, rejecting child labour, forced labour and all forms of exploitation or taking advantage of situations of need or vulnerability.

Internal control is established through the Compliance Committee to recognise and justify any decision regarding regulatory compliance, so that the decision is in line with internal and external standards and can be justified and verified by internal and external controls or third parties.

4.2.3 Equal Opportunities and Non-Discrimination

- The principle of equal opportunities and non-discrimination is a guiding principle of our HR policies. Globalia prohibits any conduct that may cause hostility, discrimination or violence against a group or person on the basis of their ideology, religion or beliefs; their ethnicity, race or nationality; their gender; their sexual orientation; family situation; illness or disability; legal or trade union representation of workers; or the use of any of the official languages of the State.
- Only criteria such as professional ability, effort, knowledge, experience and capacity will be taken into account when hiring new employees and promoting existing ones.
- The necessary resources are provided for employee training and updating their knowledge, with the aim of helping them to develop professionally and personally.
- Furthermore, through its policies, Globalia is committed to promoting actions to enable a balance between personal and professional life.

4.2.4 Prevention of Workplace Harassment

- Globalia pays special attention to preventing situations of harassment that may arise within the organisation. Such situations of defencelessness, as well as the fear of reporting them, are managed by putting in place the necessary mechanisms to bring them to the attention of the company, guaranteeing the absolute confidentiality of the information and the investigation of the complaint.
- Likewise, any conduct or act that violates the sexual freedom of individuals is prohibited.

4.3 Information processing, transparency and confidentiality

Globalia protects and respects the integrity, availability and confidentiality of the information and personal data provided by the individuals or entities with which it interacts. This protection extends to employees, customers, suppliers, collaborators and contractors, among others. The same applies to information and knowledge generated within the Group or owned by it.

For Globalia, the security of its information assets is a structural issue and, in this regard, it has implemented security policies and procedures that are mandatory for all personnel, aimed at preventing the misuse of information and ensuring its availability. Globalia complies with the requirements established in current regulations on the protection of personal data and the information to which it has access. Once again, Globalia's commitment in this regard is reflected in the achievement of ISO 27001 certification in some of its divisions.

Similarly, controls are established over its suppliers, contractors and entities with which it collaborates, which will be proportional to the information security risk they present.



4.4 Commitment to the environment



Globalia conducts its business with respect for the environment, complying with current regulations and going even further in some of the Group's divisions with the implementation of internationally recognised voluntary standards such as EMAS and ISO 14001.

The companies in the Group are committed to minimising and managing risks caused by waste, emissions, spills, radiation, noise, vibrations, explosives and any other agent that may have an impact on the environment.

Globalia also expresses its commitment to the conservation of natural resources, public property and places of recognised scenic, ecological, artistic, historical and cultural value.

All our employees must bear in mind this code of ethics regarding environmental protection in the performance of their duties. Globalia is responsible for communicating each of the measures, policies and procedures that help to improve and prevent potential negative risks to the environment and is committed to acting in a manner that promotes sustainability and respect for the environment.

In addition, Globalia establishes controls over the activities of suppliers, contractors and collaborators, requiring compliance with the environmental procedures and requirements applicable in each case.

4.5 Relations with stakeholders

4.5.1 Media and social networks

Transparency and honesty are the cornerstones of GLOBALIA's communication policy. All information that must be disclosed through the media and social networks will meet the criteria of truthfulness, confidentiality, appropriateness and consistency. Globalia will establish policies and procedures to articulate how to communicate relevant news, actions and developments. In this regard, relations with the media and social networks will be carried out by the persons and channels established for this purpose.

GLOBALIA professionals, through their social media profiles, shall refrain from communicating information obtained in the course of their professional activity or publishing information, opinions or personal statements that may harm the interests of the Group.

4.6 Political neutrality and association

Globalia carries out its activities and relations with the Government, Administration, Institutions and Political Parties under the principle of political neutrality. Furthermore, it recognises and respects the right of its staff to freedom of expression, thought and association, as well as their right to participate in public life, provided that such participation does not involve associating Globalia with a specific political opinion or party.

4.7 Use of assets

The assets (property, information systems and communications, etc.) owned by the Organisation shall be made available to employees so that they may carry out their work properly. However, they must use them in accordance with the general rules of use set out below:

- Employees and managers shall take the utmost care of the assets made available to them by the Organisation and use them for activities directly related to the interests of the Organisation and for its direct benefit.
- The Organisation's assets shall not be used for private or non-professional purposes, except where strictly reasonable in accordance with the principle of good faith.
- Similarly, employees and managers are not permitted, among other things, to send threatening or abusive emails, use inappropriate language, make inappropriate comments that could offend a person or damage the image of the Organisation, or browse websites with inappropriate content.
- The image, brand and reputation of Globalia shall be preserved, cared for and protected by employees and managers in the course of their professional activities, avoiding any conduct that could damage or jeopardise them. Self-employed workers, freelancers or third parties with a similar relationship with the Organisation shall act in the same manner.

4.8 Commitment to the market


4.8.1 Protection of intellectual and industrial property

At Globalia, we respect our own and others' intellectual property, including, among other things, advertising campaigns, brochures, slogans, presentations, speeches, reports, projects, computer programmes and any other protected work, even if the copyright symbol does not appear.

The same protection shall apply to assets protected by industrial property rights, such as trademarks, domain names, patents, industrial designs and other protected intangible assets.

At Globalia, we pay special attention to software protection. In this regard, all programmes installed on the Group's equipment have the corresponding user licences. Likewise, professionals shall not install or use programmes or applications on the computer systems provided by Globalia whose installation may be contrary to intellectual property rights.





4.8.2 Market and consumer protection

At Globalia, we are committed to competing fairly in the market, avoiding any conduct that could harm consumers or constitute collusion, abuse or restriction of competition. In this regard, we are making considerable efforts to adapt to the new PCI-DSS security standards.

Information from third parties, and in particular from competitors, will be obtained legally and fairly.

Likewise, under no circumstances will misleading advertising or offers that could cause harm to consumers be made. Similarly, it is strictly prohibited to spread false news or rumours about other people or companies, especially competitors.

Pre-contractual or contractual relations with customers, especially when they are consumers, shall be conducted in accordance with the principles of transparency and accurate information. In this regard, contracts with customers shall be drafted in clear and simple language.

5. COMPLIANCE COMMITTEE

Globalia has a compliance management structure comprising a Compliance Committee for each of the divisions that make up the GROUP. These Committees will be responsible for promoting and making decisions related to compliance with the values and standards of conduct established in this Code of Ethics. These Committees will also be responsible for implementing, supervising and controlling Globalia's Integrated Compliance Management System and for its continuous improvement through regular updates of the Organisation's risk maps and the Anti-Corruption Policy.

The Compliance Committee shall be responsible for promoting, monitoring and controlling compliance with the values and standards of conduct established in the Code of Ethics.

These Committees are specific to each division and are managed independently within the GROUP. All Committees report to the corresponding Governing Body under the supervision of the Compliance Officer and the Management Body.

6.

REPORTING OF INCIDENTS AND IRREGULARITIES

An incident is considered to be any event that affects a business in such a way that it raises doubts about the application of the provisions of the Code of Ethics.

Any person affected by this Code of Ethics (employees, suppliers, stakeholders) who wishes to communicate with the intention of contributing possible improvements to the provisions herein, or who wishes to report possible incidents or irregularities that affect compliance with this Code of Ethics, the Anti-Corruption Policy or other internal or external regulations applicable to Globalia, may do so through Globalia's Ethics Channel or Internal Information System.

All communications must always be made in good faith, avoiding false or unfounded accusations.

Communications may even be made anonymously if the informant so wishes.

These communications may be made through the Ethics Channel by means of a face-to-face meeting, videoconference or telephone call with the Compliance Officer.

In the case of the AIR DIVISION, they may also be made through the following channels:

- <https://aireuropa.canaletico.es/>
- By sending an email to canaletico@aireuropa.com
- Via <https://staff.aireuropa.com>
- Postal mail to:

Departamento de Cumplimiento
Calle Enrique Granados 6
Edificio A
28024 Pozuelo de Alarcón
Madrid

For the rest of the GROUP's DIVISIONS, returns can be made through the following channels:

- <https://globalia.canaletico.es/>
- Email: cumplimos@globalia.com
- Postal mail to:

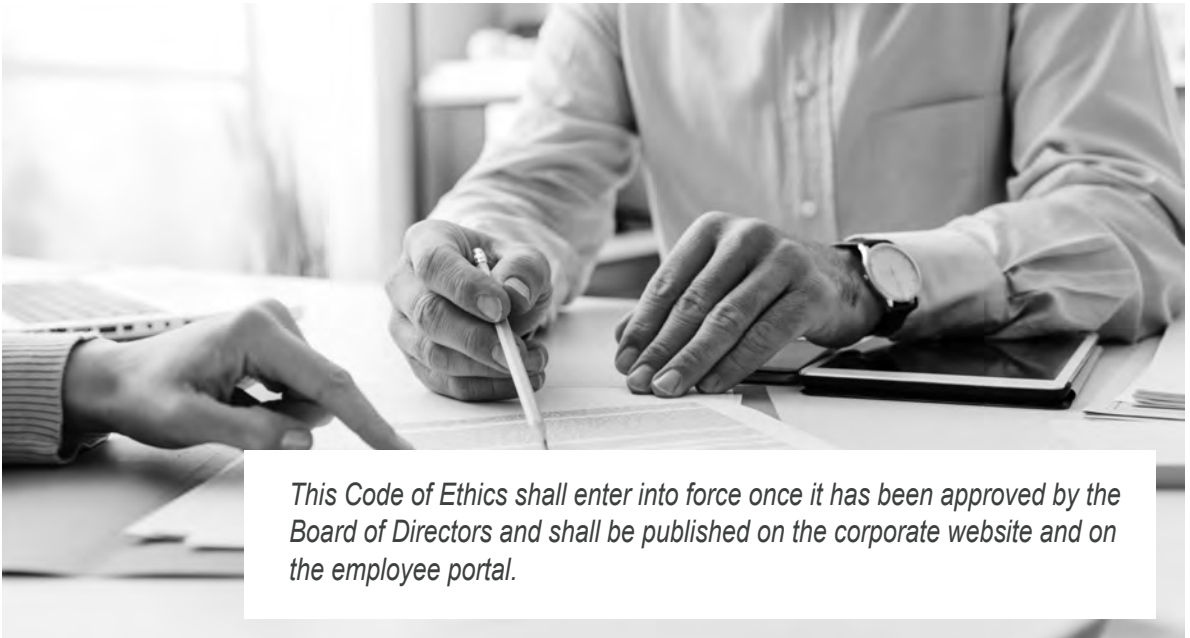
Departamento de Cumplimiento
Calle Enrique Granados 6
Edificio A
28024 Pozuelo de Alarcón
Madrid

7.

APPROVAL OF THE CODE OF ETHICS

Globalia guarantees its commitment to respect the absolute confidentiality of the data of the person making the report and the facts communicated, as well as the total absence of reprisals. All persons who have to deal with the incident or irregularity are subject to a confidentiality agreement.

Notwithstanding the above, the data of a complainant may be provided to the administrative or judicial authorities, at their request, in compliance with the legislation on the protection of personal data.



This Code of Ethics shall enter into force once it has been approved by the Board of Directors and shall be published on the corporate website and on the employee portal.

8. SUPERVISION AND COMPLIANCE

This Code of Ethics is mandatory for all employees of the Group, and the Compliance Committees will be responsible for ensuring that it is accepted and internalised by each employee, ensuring that it is complied with and kept up to date. Likewise, all employees of the Organisation undertake to comply fully with this Code of Ethics, regardless of the activity they carry out, the place where they operate and their contractual relationship with Globalia.

Any breach of the provisions of this Code of Ethics will be investigated and will result in disciplinary action being taken by Globalia in accordance with internal procedures, collective agreements and applicable legislation, without prejudice to any administrative, civil or criminal penalties that may arise.



Factory 1
Factory 2
Factory 3
Factory 4
Factory 5

Business Report



