



Code of Ethics

GROUP COMPANIES



which also addresses the criminal prevention obligations established within the framework of a legal entity's criminal liability.

1. MESSAG

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CHAIRMAN

Globalia is undergoing a process of significant and substantial changes that mark the beginning of a new era characterized by major challenges and opportunities that address the expectations of today's society.

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

Through this Code of Ethics, we are strengthening our corporate culture, which is based on compliance with current legislation, and demonstrating a firm commitment to our employees, suppliers, customers, and society at large.

Today, we encounter a multitude of situations that can hinder the performance of our duties and may give rise to ethical dilemmas that we do not know how to address. For this reason, I am leading this change aimed at fostering a culture rooted in ethical principles and values; we must work to internalize them so that we can continue to demonstrate that we are the leading national tourism group.

This Code of Ethics lays the foundation for a regulatory framework within Globalia and, therefore, serves as 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 reinforce, across each and every company and professional that makes up Globalia, a single way of acting—based on principles and guidelines of conduct designed to ensure ethical and responsible behavior—

Likewise, Globalia's management, committed to society and to the highest standards of compliance with the regulations that apply to 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 regarding the criminal liability of legal entities but is also based on international best practices and recognized standards, such as the UNE ISO compliance standards.

As a reflection of this commitment, Globalia has established an Ethics Hotline through which we address all inquiries and concerns regarding conduct that may conflict with the principles and standards of conduct set forth in this Code of Ethics, while respecting the principles of confidentiality, integrity, and availability of information at all times.

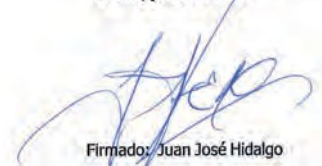
With all of the above, Globalia reaffirms its commitment to ethics, business integrity, and strict compliance with applicable laws. Our goal is to strengthen our corporate culture and establish ourselves as a leader in compliance.

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

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

I thank you for your involvement in continuing to advance our process of improvement and our commitment to society.

Madrid, junio de 2025



Firmado: Juan José Hidalgo

2. PURPOSE AND SCOPE OF APPLICATION

The Code of Ethics serves as 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 adhering to principles and guidelines of conduct designed to ensure ethical and responsible behavior. It also addresses the new criminal prevention obligations established within the framework of criminal liability of legal entities.

It is therefore intended for each and every employee of

Globalia, regardless of their position, responsibility, or role within the company. It also applies to all individuals with powers of representation and management within the GROUP.

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

From a personal standpoint, the Code of Ethics applies to all levels of Globalia, including the governing bodies, executive positions, and oversight bodies.

Likewise, it shall extend, to the extent possible, to Globalia's suppliers, collaborators, contractors, and customers.

Geographically, it applies to all activities carried out by Globalia in any geographic area, whether local or international.

3. MISSION, VISION, AND VALUES GUIDING PRINCIPLES

3.1

Mission and Vision

Our mission is to be the leading national tourism group that meets customer satisfaction in a profitable manner, always guided by the principles of ethics and professionalism.

Our vision is to collaborate and contribute to the economic and social progress of all the people we serve and with whom we interact, providing our customers with service based on transparency and integrity.



3.2 Values

Values are the convictions that we at Globalia consider indispensable, as they define who we are, shape our culture, and help us excel:

·NORMALITY

We strive to act with integrity and treat our employees, customers, and suppliers in accordance not only with regulations but also with our principles and corporate culture, in order to achieve the goals demanded by a modern society.

·HONESTY

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





·ADAPTABILITY

We are a group that, throughout our professional history, has been able to adapt to the circumstances of the society we serve and to our clients' needs. Today, Globalia is fully aware that the fundamental aspect of our daily work is knowing how to interpret what society demands—not only what it needs, but also how it needs it—and responding with the necessary resources.

·TEAMWORK AND PROFESSIONALISM

For us, improvement is only possible from within and through the collective efforts of everyone 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 the country. We encourage employee initiative, equal opportunity, and training so that our staff can reach their full potential.

·INTEGRITY

Globalia is a group of integrity that can be trusted, with respect for itself and for the people who make it up. We are rigorous in upholding our principles and values, which enables us to remain steadfast in the commitments we have made.

· **LEADERSHIP:** As leaders in the tourism sector, we aim to demonstrate how companies become stronger through ethics and values. 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 builds trust and peace of mind among our employees, our customers, and everyone we interact with. We are committed to sharing information—both internally and externally—in a truthful, accurate, and clear manner, with a special focus on ensuring the reliability of financial information.

4.

CODE OF CONDUCT

The code includes basic guidelines for conduct that all employees must internalize as their own and ensure are followed within the organization.

4.1 Preventing Fraud, Bribery, and Corruption

Globalia prohibits any action taken within its sphere of activity that involves the abuse of power by individuals in key positions and that could disrupt the proper functioning of the Group. To this end, Globalia—as part of its commitment to complying with applicable laws and regulations—will establish appropriate controls to ensure compliance with its tax obligations and implement measures to safeguard the integrity of its accounting and financial systems.

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

Furthermore, it expresses its commitment to collaborate closely with internal audit units, external auditors, and competent authorities, cooperating at all

at all times with the judicial system. Similarly, it will not use misleading or falsified information for the purpose of obtaining grants or any other type of aid or advantage.

Globalia bases its relationships with the public and private sectors—both nationally and internationally—on the principles of transparency and equal opportunity, rejecting any action aimed at gaining an advantage over its competitors through unlawful means. In this regard, Globalia has developed rules and policies regarding gifts and business incentives, the requirements and limits of which must be respected by all Globalia personnel; examples of this include the Anti-Corruption Policy, the Gifts and Invitations Policy, and the Donations and Sponsorships Policy. In addition, Globalia will implement 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's unwavering goal is to ensure a safe environment that prevents any risk to the health and physical well-being of its employees and complies with all safety specifications, as well as with the specific regulations applicable to its sector. All levels of Globalia are committed to this objective, and each workstation undergoes a preliminary risk assessment that identifies 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 is demonstrated by the attainment of OHSAS 18001 certification for some of its divisions.

Globalia personnel are prohibited from handling, transporting, or assisting in the transport of any substance or item that could constitute a criminal offense.

In addition, Globalia monitors its suppliers, contractors, and, in general, all its partners, 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:

- Complying with applicable laws in each and every country where it operates, adopting international standards where no specific legal framework exists. Among the regulatory instruments used as references are 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 the OECD Guidelines for Multinational Enterprises.

- Human rights will be respected, and the company rejects child labor, forced labor, and any form of exploitation or taking advantage of situations of need or vulnerability.

An internal control mechanism is established through the Compliance Committee to review and justify any decision regarding regulatory compliance, ensuring that such decisions align with both internal and external standards and are justifiable and verifiable through both internal and external audits or by third parties.

4.2.3 Equal Opportunity and Non-Discrimination

The principle of equal opportunity 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 individual based on their ideology, religion, or beliefs; membership in an ethnic group, race, or nation; gender; sexual orientation; family status; illness or disability; legal or union representation of employees; or the use of any of the state's co-official languages.

Only criteria such as professional competence, effort, knowledge, experience, and ability will be considered when hiring new employees or promoting current ones.

The necessary resources are provided for employee training and the updating of their knowledge, with the aim of helping them develop both professionally and personally.

Furthermore, through its policies, Globalia is committed to promoting initiatives that 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 occur within the organization; such situations of vulnerability, as well as the fear of reporting them, are addressed by establishing the necessary mechanisms to bring them to the company's attention, guaranteeing absolute confidentiality of the information and a thorough investigation of the complaint.

Likewise, any conduct or act that infringes upon an individual's sexual freedom is prohibited.

4.3 Information Handling, 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, among others, to employees, customers, suppliers, partners, and contractors. 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 fundamental aspect of its operations. To this end, the company has implemented security policies and procedures that are mandatory for all staff, designed to prevent the misuse of information and ensure its availability. Globalia complies with the requirements set forth in current regulations regarding the protection of personal data and the information to which it has access. Once again, Globalia's commitment in this regard is demonstrated by the fact that some of its divisions have obtained ISO 27001 certification.

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



4.4 Commitment to the Environment



Globalia conducts its business with respect for the environment, complying with current regulations, and going above and beyond in some of the Group's divisions by implementing internationally recognized voluntary standards such as EMAS and ISO 14001.

The Group's companies adhere to standards of conduct aimed at minimizing and managing risks arising from, among other things, waste, emissions, discharges, radiation, noise, vibrations, or explosives, as well as any other agent that may have an environmental impact.

Furthermore, Globalia reaffirms its commitment to the conservation of natural resources, public assets, and sites of recognized scenic, ecological, artistic, historical, and cultural value.

All our employees must keep this code of conduct regarding environmental protection in mind when carrying out their duties. Globalia is responsible for communicating each of the measures, policies, and procedures that help improve environmental conditions and prevent potential negative environmental impacts, 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 partners, requiring compliance with the environmental procedures and requirements applicable in each case.

4.5 Relations with Stakeholders

4.5.1 Media and Social Media

Transparency and honesty are the cornerstones of GLOBALIA's communication policy. All information to be disclosed through the media and social media will meet the criteria of accuracy, confidentiality, appropriateness, and consistency. Globalia will establish policies and procedures to outline how to communicate relevant news, actions, and updates. In this regard, relations with the media and social media will be managed by the individuals and channels designated for that purpose.

GLOBALIA professionals, through their social media profiles, shall refrain from sharing information obtained in the course of their professional activities or from posting personal information, opinions, or statements that could harm the Group's interests.

4.6 Political and Associational Neutrality

Globalia conducts its activities and maintains its relationships with the government, public administration, institutions, and political parties in accordance with the principle of political neutrality. Furthermore, it recognizes and respects its employees' right to freedom of expression, thought, and association, as well as their right to participate in public life, provided that such participation does not imply associating Globalia with a specific ideology or political party.

4.7 Use of Assets

- Employees and executives must safeguard the assets made available to them by the Organization with the utmost care and use them for activities directly related to the Organization's interests and for its direct benefit.
- The Organization's assets shall not be used for personal or non-work-related purposes, except to the extent strictly reasonable in accordance with the principle of good faith in contractual relations.
- Likewise, employees and executives 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 Organization's image, or browse websites with inappropriate content.
- Globalia's image, brand, and reputation shall be preserved, safeguarded, and protected by employees and executives in the course of their professional activities, avoiding any conduct that could harm or jeopardize them. The same applies to independent contractors, freelancers, or third parties with a similar relationship to the Organization.

4.8 Commitment to the Market

4.8.1 Protection of Intellectual and Industrial Property

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

The same protection applies 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 software installed on the Group's computers is covered by the appropriate licenses. Furthermore, employees do not install or use any software or applications on the computer systems provided by Globalia whose installation may infringe upon 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 a restriction of competition. In this regard, we are making a considerable effort to comply with the new PCI-DSS security standards.

The collection of information from third parties, and in particular from competitors, will be conducted in a lawful and fair manner.

Furthermore, 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 rumors about other individuals or companies, especially competing companies.

Pre-contractual or contractual relationships with customers—especially when they are classified as 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 consisting of 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. Furthermore, these Committees will be responsible for implementing, supervising, and monitoring Globalia's Integrated Compliance Management System and ensuring its continuous improvement through periodic updates to the Organization's risk maps, as well as to the Anti-Corruption Policy.

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

Thus, these committees are specific to each division and operate independently within the GROUP. All committees report to the corresponding Governing Body under the supervision of the Compliance Officer and the Executive Board.

The Compliance Unit, which reports to the Compliance Committee, receives reports of incidents and irregularities and manages them accordingly.

6. REPORTING OF INCIDENTS AND IRREGULARITIES

Any person subject to this Code of Ethics (employees, suppliers, groups of interest) who wishes to submit a report with the intention to suggest possible improvements regarding what provisions set forth therein, or to report possible incidents or irregularities affecting both the compliance with this Code of Ethics, as well as the Anti-Corruption Policy or other internal or external regulations applicable to Globalia, you may do so through Globalia's Ethics Channel or Internal Reporting System. All communications must always be made in accordance with the

in good faith, avoiding false or unfounded accusations.

Reports may even be made anonymously if the whistleblower so desires.

These reports may be submitted through the Ethics Channel via an in-person meeting, a videoconference, or a phone call with the Compliance Officer.

Globalia guarantees its commitment to maintaining the absolute confidentiality of the whistleblower's personal information and the facts reported, as well as ensuring there will be no retaliation whatsoever. All individuals involved in handling the incident or irregularity are bound by a confidentiality agreement.

In the case of the AVIATION DIVISION, this can also be done through the following channels:

- <https://aireuropa.canaletico.es/>
- By sending an email to canaletico@aireuropa.com
- Via <https://staff.aireuropa.com>
- By mail to: Compliance Department
6 Enrique Granados Street,
Building A
28024 Pozuelo de Alarcón
Madrid

For the GROUP's other DIVISIONS, reports may be submitted through the following channels:

- <https://globalia.canaletico.es/>
- Email: cumplimos@globalia.com
- Mail to: Compliance Department
6 Enrique Granados Street,
Building A
28024 Pozuelo de Alarcón
Madrid

Notwithstanding the foregoing, a whistleblower's personal information may be disclosed to administrative or judicial authorities upon their request, always in compliance with applicable personal data protection laws.

7. APPROVAL OF THE CODE OF ETHICS

This Code of Ethics will take effect once it has been approved by the Board of Directors and will be published on the corporate website and the employee portal.



8. MONITORING 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 understood and internalized by each employee, while ensuring that it is followed and kept up to date. Likewise, all employees of the Organization commit to fully respecting this Code of Ethics, regardless of the work they perform, the location where they operate, or the contractual relationship they have with Globalia.

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



