

# CRIMINAL COMPLIANCE POLICY



Prepared by:	Reviewer:	Approved by:
Compliance Department	Compliance Officer	Board of Directors
Date: March 2026	Date: March 2026	Date: March 2026

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**CHANGE LOG**

<b>Revision</b>	<b>Date</b>	<b>Revision</b>
1.0	06/25	Approval by the Board of Directors
2.0	03/26	Inclusion of a provision prohibiting conduct that is harmful to whistleblowers acting in good faith

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**GLOBALIA GROUP COMPANIES**

# GLOBALIA



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## **GLOBALIA GROUP CRIMINAL COMPLIANCE POLICY**

**GLOBALIA GROUP** is a Spanish tourism group comprising several companies operating in various sectors of the tourism and travel industry. In addition to Air Europa, the group includes Be Live Hotels, Groundforce, Globalia Maintenance, and other companies that provide complementary services such as customer service, training, and technological solutions. Our activities are subject to numerous regulations, both nationally and internationally; therefore, **legal compliance, integrity, and ethics** in the conduct of our business activities and in the implementation of our corporate strategy are of critical importance and strictly enforced within our Organization, particularly when it comes to criminal and anti-corruption regulations.

The Management of **GRUPO GLOBALIA**, committed to society and to the highest standards of compliance with the regulations that affect us, has implemented its own **Integrated Compliance Management System** (hereinafter, the System), thereby voluntarily aligning itself with the criteria regarding criminal compliance set forth both in criminal law regarding the criminal liability of legal entities (which includes the risks of fraud and corruption) and in UNE 19601 on Criminal Compliance Management Systems: Requirements with Guidance for Use. Through this Policy, we express our firm commitment to the continuous improvement of this System.

Our System is an essential part of our **compliance culture** and constitutes the implementation of a framework for the organization, management, and oversight of criminal risks, aimed at preventing, detecting, investigating, and, where appropriate, sanctioning the commission of crimes within the Organization, in accordance with the provisions of the Criminal Code, with our primary objective being zero tolerance for criminal conduct within our Organization and strict compliance with compliance obligations by all members of our stakeholders. Any breach of internal and/or external regulations will be sanctioned in accordance with the provisions of the current disciplinary regime and applicable labor regulations.

The System applies to all areas and activities of the Organization and affects all Directors, Senior Managers, and Employees thereof. Therefore, a training, communication, and dissemination plan is established annually, detailing the practical aspects of crime prevention so that all members of the Organization are aware of their rights and obligations regarding criminal compliance.

Furthermore, it is hereby noted that any Director, Senior Manager, Employee, collaborator, or service provider who becomes aware of conduct contrary to this Policy, the **Code of Ethics, or the Policy**

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**Any issues related to anti-corruption, the Gifts and Invitations Policy,** or any other internal or external regulations, as well as any concerns or questions regarding these matters, should be reported to the Organization's compliance function through the channels and procedures established for this purpose:

**Aviation Division**

<https://aireuropa.canaletico.es/>

Email: [canaletico@aireuropa.com](mailto:canaletico@aireuropa.com)

**Other Globalia Group companies:**

<https://globalia.canaletico.es/>

Email: [cumplimos@globalia.com](mailto:cumplimos@globalia.com)

All matters related to the Organization's **Ethics Channel** are governed by the Ethics Channel Policy and the Information Management Procedure. Our channel is strictly confidential, with the option of anonymity, and any form of retaliation against whistleblowers acting in good faith , as well as any other potentially harmful conduct, is prohibited.

The compliance function has been established to ensure the effectiveness of this System, to monitor, manage, and keep it up to date, and to resolve any issues that may arise. The compliance function operates autonomously and independently, with all the necessary powers and authority for this role.

With this Program, **GRUPO GLOBALIA** aims to take another step forward in its commitment to business ethics and integrity and its scrupulous adherence to current regulations and legislation, as well as to the requirements of the highest international standards, with our Organization's ultimate goal being to become a benchmark in compliance.

We are convinced that the collective effort made by everyone to uphold our Organization's values and build a solid reputation for honesty and integrity will help us become a more successful company and create greater value for our partners, while also earning the utmost trust of all our clients and society as a whole.

This Policy is made available to all interested parties who wish to access its content through internal employee communication channels, the ethics channel web platform, and the external corporate website.

Madrid, March 2026

Mr. Juan José Hidalgo Acera

Chairman of GLOBALIA