

**MAPFRE ASISTENCIA S.A INFORMATION MANAGEMENT PROCEDURE****1. INTRODUCTION**

This document contains the Information Management Procedure (the **Management Procedure** or the **Procedure** ) for Complaints submitted within the framework of the Internal Information System established at MAPFRE.

The purpose of the Procedure is to establish the necessary provisions so that the Internal Information System of MAPFRE ASISTENCIA, COMPAÑÍA INTERNACIONAL DE SEGUROS Y REASEGUROS SA hereinafter, indistinctly, MAPFRE ASISTENCIA, MAWDY, or *the Entity* complies with the Internal Information System Policy of MAPFRE, S.A.(the **Policy** ), as well as with the requirements set forth in current regulations, including the assignment of responsibilities to those who must intervene in its management for the adequate and diligent processing of the Complaints or Information received.

**2. DEFINITIONS**

The terms used in capital letters not expressly defined in this document shall have the meaning assigned to them in the Policy.

**3. SCOPE OF APPLICATION**

This Procedure applies to MAPFRE ASISTENCIA (including its Branches) and those Subsidiaries that adhere to this Procedure by agreement of their respective administrative bodies, with the exception of the entities included in Annex I of this Procedure.

**4. RESPONSIBLE FOR THE INTERNAL INFORMATION SYSTEM**

The *Entity* 's Internal Information System Committee (hereinafter the Committee) is the Responsible for the Internal Information System of MAPFRE ASISTENCIA and its Subsidiaries (hereinafter the Entity) and, in this capacity, is the collegiate body designated by the Board of *the Entity* that is responsible for its diligent management in accordance with the provisions contained in this Procedure and with the scope established in the Policy.

The Committee is therefore responsible for receiving and processing Complaints (including their admission for processing, the initiation of investigation files into the reported events, the appointment of the Investigation Instructor and the analysis of the conclusions of the investigation carried out), as well as their Resolution (determining whether or not the reported infringement or irregularity or any other has occurred) and the decision on the relevant actions to be carried out in each case.

The Committee delegates to the person holding the position of Secretary of *the Entity* 's Internal Information System Committee (hereinafter, Committee Secretary), in the terms and to the extent established in this Procedure, the powers of management of the Internal Information System and processing of investigation files of Complaints or Information, including, among others, their reception and preliminary analysis and the maintenance of the Complaints registry book.

The Committee's operating system will be governed by the corresponding regulations approved for this purpose. The investigators of the cases will attend Committee meetings to provide relevant information and clarifications regarding the Complaints they have been entrusted with investigating, whenever deemed appropriate.

## **5. SUBMISSION OF COMPLAINTS OR INFORMATION**

Informants included in any of the groups indicated in the subjective scope of application of the Policy and on the matters indicated in its objective scope have access to *the Entity* 's Internal Information System .

Without prejudice to the foregoing, any person may go to any external channel established by the competent Authorities in the countries in which MAPFRE ASISTENCIA has a presence and to which this Procedure is applicable, and/or to the competent authorities or bodies in each jurisdiction (national or supranational) where the Entity has a presence or operates in commercial traffic.

The Informant may choose whether to file his/her Report by identifying himself/herself with his/her personal data or whether to do so anonymously, using in both cases any of the following means (the "**Means**" ):

- Corporate platform accessible through [www.mawdy.com](http://www.mawdy.com) and the respective local websites of the subsidiaries and branches.
- **Email** : [sistemainternodeinformacion@mawdy.com](mailto:sistemainternodeinformacion@mawdy.com) , except in the case of MAWDY entities in Italy where it will not be possible to submit a complaint through this email <sup>1</sup>.
- Postal address: Attention: MAPFRE ASISTENCIA Internal Information System; Ctra Pozuelo Majadahonda, 52, Building 2, Floor 0 (28220, Majadahonda, Madrid)

Complaints may also be submitted verbally through an in-person meeting at the request of the Informant, who must direct his or her request through one of the means indicated above.

Once the request has been made, the in-person meeting will take place within a maximum of seven (7) calendar days. With the prior consent of the Informant, verbal Complaints may be recorded and, in all cases, will be documented through a complete and accurate transcript of the

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<sup>1</sup> In application of Italian regulations (Legislative Decree 10/03/2023, n. 24; ANAC Guidance Lines 12/07/2023, n. 311).

conversation. After this, the Informant will be offered the opportunity to verify, rectify, and accept the transcript by signing it.

The confidentiality of the identity of the Informants and Persons Affected by the Complaint, and of the facts and data contained therein, will be guaranteed, even if received through channels or means that are not part of the Internal Information System or by persons other than the System Manager. To this end, the person receiving them will request the Informant to use the Means indicated in this Procedure and will be obliged, in all cases, to immediately forward all information received to the System Manager through the email address [sistemainternodeinformacion@mawdy.com](mailto:sistemainternodeinformacion@mawdy.com) and to guarantee the confidentiality of the information at all times.

## **6. RECEPTION, ADMISSION AND REGISTRATION OF COMPLAINTS**

Once the Complaint has been received by any of the indicated Means, the Committee Secretary will send an acknowledgment of receipt to the Informant who has identified himself and indicated an address, email address or secure place for receiving notifications, within the following seven (7) calendar days, unless this could jeopardize the confidentiality of the communication or the Informant has waived the right to receive information about his Complaint. Likewise, the Committee Secretary will proceed to analyze and preliminarily evaluate the Complaint and will decide whether to reject it for processing in the following cases:

- (i) When the content of the Complaint refers to conduct, facts, or information that are not included within the scope of the Policy.

Claims or Communications of a Commercial or Contractual Nature will be sent for processing through the procedures established for this purpose, and will be notified to the Informant.

- (ii) When the facts are described in a generic or imprecise manner and make it impossible to investigate the alleged irregularities reported.

Before rejecting the Complaint for this reason, the Committee Secretary will ask the Informant, when the Complaint is not anonymous, to clarify and specify the facts to which it refers. If the deficiencies are not corrected, the Complaint will be rejected, without prejudice to the subsequent initiation of an investigation if additional information is received in accordance with the Policy.

- (iii) When the information received is not credible, is based on manifestly unfounded and unproven facts, or is based on mere rumors lacking credibility.

- (iv) When the Complaint received does not contain new or significantly different information from that contained in previous Complaints or Information for which the corresponding procedures have been concluded.

- (v) When there are indications that the information has been obtained illegally. In this case, the Corporate Department of the General Secretariat and Legal Affairs will also be informed of the complaint so that, where appropriate, it can take appropriate legal action.
- (vi) When it concerns information related to claims about interpersonal conflicts or that affect only the Informant and the persons to whom the Complaint refers, unless it deals with conduct that potentially constitutes harassment.
- (vii) When the Complaint refers to facts or situations that have also been reported through an external channel or are being investigated administratively or by the Courts of Justice.

If the Complaint is rejected for any of the above reasons for rejection, the Committee Secretary will close the case, leaving a reasoned record of this decision in the Internal Information System Registry, and will inform the Informant of the decision adopted, using the contact information that the Informant has provided, if applicable, unless the Informant has opted out of receiving communications regarding the Complaint made.

If, after analyzing the Complaint, the Secretary of the Committee considers that none of the grounds for inadmissibility indicated in sections (i) to ( vii ) above apply, he or she will forward it to the Committee, which will analyze whether there are reasonable indications of the alleged existence of an irregularity or violation included in the scope of this Procedure and, consequently, will agree to its admission or non-admission for processing and, where appropriate, the initiation of the corresponding investigation file and the appointment of its Investigator. The agreement of admission or non-admission for processing made by the Committee will also be communicated to the Informant through the channel provided for in the previous section.

The investigator of the case (the **Instructor** ) may be a person from *the Entity* or an external collaborator, at the Committee's discretion, depending on the nature of the reported events. It may request the collaboration of other areas at any time or engage external collaborators to carry out any investigative procedures.

Both the Instructor and any third party involved in any investigation into the facts to which the Complaint or Information refers will be subject to the confidentiality obligations set forth in the Policy.

In the case of Complaints that address facts that could constitute conduct or acts of harassment in any of its forms, filed within the scope and reach of the Corporate Protocol for the Prevention and Treatment of Harassment, the investigation of the file will be assigned to the Investigative Body referred to in the aforementioned Protocol, which will carry out the investigation procedures in accordance with the internal procedure and deadlines for action set forth in said document. Meanwhile, in the case of Complaints that address facts that could constitute internal

fraud under the terms established in the Mapfre Group's Corporate Anti-Fraud Policy, the investigation of the file will be assigned to the Corporate Security Department, which will carry out the investigation procedures in accordance with the provisions of said Policy.

The Committee will agree to suspend the processing of the case if it becomes aware of the use of external channels or the initiation of administrative or, where appropriate, judicial proceedings regarding the same facts that are the subject of the Complaint, and until their completion, without prejudice to providing the aforementioned authorities with the necessary information and support that may be requested.

Likewise, when the complaints received, evidence provided, and/or verifications and investigations conducted reveal reasonable indications that the facts could constitute a crime, the Committee will agree to forward the information to the Corporate Area of the General Secretariat and Legal Affairs for transmission to the Public Prosecutor's Office. If the financial interests of the European Union are affected, it will also inform the European Public Prosecutor's Office.

The Committee Secretary will be responsible for maintaining and updating the Complaints Registry, using a logbook in which he or she will record the Complaints received, their management and processing, any internal investigations they may have led to, and the resolution adopted on them.

The Committee shall take the necessary measures to ensure the confidentiality and protection of all data included in the Registry.

Complaints processed in accordance with the Corporate Protocol for the Prevention and Treatment of Harassment, as well as the Committee's Resolutions, will be included in a specific section of the registry book under the custody and responsibility of the Secretary .

In the event that the communication received consists of a query regarding the interpretation and/or application of MAPFRE's Code of Ethics and Conduct, the Committee Secretary will forward it to the Corporate Compliance Director, who, after analyzing it, will send the Informant the relevant response as soon as possible.

## **7. INVESTIGATION OF THE REPORTED FACTS**

Once the Complaint is admitted for processing, the Committee may agree to conduct internal or external investigations to clarify the reported facts.

The Instructor appointed by the Committee will be responsible for coordinating and promoting the investigation process, carrying out or requesting the actions he or she deems pertinent, requesting the necessary assistance and resources, and gathering the information and documentation he or she deems necessary to verify the accuracy and veracity of the information received. He or she may also maintain communication with the Informant and request any additional information he or she deems appropriate for the purpose of the investigation.

Depending on the content of the Complaint, the Affected Persons, to whom the offending conduct is attributed or with whom the infringement or irregularity that is the subject of the Complaint is associated, will have the right to be informed of the actions and omissions attributed to them and to be heard at any time and in the manner deemed appropriate to ensure the successful completion of the investigation.

In accordance with the Policy, all the rights of the Affected Persons will be respected during the processing of the file, such as the right to the presumption of innocence, the right to honor, the right to an impartial investigation of the facts, the right to defense and the right to use the means of evidence deemed appropriate and pertinent, and the right to access the file, under the terms established by law. Access to the file will be understood as the right to know the facts attributed to them without revealing information that could identify the Informant and without compromising the outcome of the investigation. They will also enjoy the same protection established for Informants, preserving their identity and guaranteeing the confidentiality of all facts and data contained in the file.

Without prejudice to the foregoing, the Affected Persons will at no time be informed of the identity of the Informant, nor will they have access to the original Report or any other information that could reveal the identity of the Informant.

Once the relevant tests have been carried out and the investigation concluded, the investigating officer will prepare a report containing a statement of the reported facts, the actions taken to verify the veracity of such facts, and the conclusions reached during the investigation (the **"Report"** ), which will be submitted to the Committee.

## 8. RESOLUTION OF COMPLAINTS

In view of the elements, data, investigations and conclusions contained in the Report of the Instructor of the file, the Committee will decide, by means of a written resolution (the **"Resolution"** ), whether the facts that are the subject of the Complaint could or could not constitute any type of infraction or irregularity and, if applicable, the pertinent actions to be carried out in each case, which may consist of:

- (i) The conclusion of the file is the filing of the Complaint, in the event that the Resolution concludes that the irregularity, illegality or violation reported has not been proven or the responsibility of the Affected Person has not been verified.
- (ii) The transfer of the Resolution
  - (a) to the People and Organization Area of the Entity, when the Resolution concludes that the irregularity or illegal act that has taken place can be attributed to an employee or manager of *the Entity* , so that it may decide on the appropriate disciplinary, corrective and/or preventive measures to be adopted, where

appropriate, in accordance with the applicable labor legislation, the adoption and content of which will be reported to the Secretary of the Committee for transfer to the Committee.

Additionally, in the case of Complaints addressing facts that could constitute conduct or acts of harassment in any of its forms, filed within the scope and reach of the Corporate Protocol for the Prevention and Treatment of Harassment, the Resolution will, in all cases, be forwarded to the Corporate Labor Relations Department, with the personal data anonymized, for the purposes of complying with the reporting obligations established in current regulations. When the legal representation of the workers has been involved in the investigation procedure at the request of any of the parties involved, the Resolution will also be forwarded to them.

- (b) to the MAPFRE SA Corporate Appointments and Remuneration Committee, through its secretary, when the Resolution concludes that a member of the Entity's Board of Directors has committed any irregularity or illicit act or contrary to the law, for the adoption of the corresponding measures, of whose adoption and content it will inform the Corporate Compliance Director , who will forward it to the Committee.
- (c) to the Corporate Area of the General Secretariat and Legal Affairs when, despite not initially finding that the facts could constitute a crime, this is evident from the investigation of the case, so that it may consider referring it to the Public Prosecutor's Office (or to the European Public Prosecutor's Office, if the financial interests of the European Union are affected), informing the Secretary of the Committee of the decision taken, who will forward it to the Committee. Also when the Resolution concludes that a supplier or collaborator of *the Entity* has committed an irregularity or an illicit act or contrary to the law, for the adoption of the corresponding contractual and/or legal measures, of whose adoption and content it will inform the Secretary of the Committee, who will forward it to the Committee.
- (d) to any other Area or department that is appropriate based on the facts and conclusions of the Resolution, for the adoption of any other measures that are deemed appropriate, the adoption and content of which shall be reported to the Secretary of the Committee, who shall forward it to the Committee.

The Resolution must be issued and communicated to the Informant who has been identified and indicated an address, email address or safe place for receiving notifications, unless he or she has waived receiving information about his or her Complaint, and to the Affected Persons, as soon as

possible <sup>2</sup>and in any case before the end of the period of three (3) months from the date the Complaint was received. If no initial acknowledgment of receipt has been sent, the maximum period for issuing the Resolution will be three (3) months and seven (7) calendar days from its receipt.

Notwithstanding the foregoing, in the case of files that deal with facts or circumstances that are particularly complex, at the discretion of the Controller, the indicated period may be extended up to a maximum of three (3) additional months.

In the event that the Affected Person is a senior manager or a member of the Board of Directors of any Group Entity or if the Complaint or Information gives rise to any reputational risk relevant to the Entity or the MAPFRE Group, the *Entity's System Manager* must inform the Corporate Compliance Director of the content of the Complaint, its processing and its timely resolution, with the corresponding decisions being adopted in a coordinated manner between the *Entity's System Manager* and the Corporate Compliance Director on the relevant actions to be carried out based on the conclusions of the investigations undertaken.

## 9. PROTECTION OF PERSONAL DATA

Personal data collected within the framework of the Internal Information System will be processed in accordance with current data protection regulations and, in particular, will adhere to the principles of lawfulness, purpose limitation, data minimization, accuracy, retention period limitation, and confidentiality established therein.

## 10. INFORMATION TO GOVERNING BODIES

The Committee will annually submit information to the MAPFRE ASISTENCIA Board of Directors on the operation of the Internal Information System, which will include, at a minimum, the number of complaints received, their origin, type, the results of the investigations, and the resolutions adopted.

Without prejudice to the foregoing, the Entity shall, where appropriate, individually inform the Audit Committee of any Complaints or Information relating to irregularities of a financial or accounting nature, or related to aspects related to sustainability, which could have a material impact on the Group's financial statements, non-financial reporting statements, or internal control.

## 11. DIFFUSION

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<sup>2</sup> In the case of MAWDY entities in Portugal and in application of Article 11.9/4 GDPR, the Informant may request the result of the analysis carried out on his/her complaint, which will be communicated to him/her within a maximum period of fifteen (15) days after the conclusion of said analysis.



This Management Procedure will be included together with the Policy in a separate and identifiable section of the home page of the website [www.mawdy.com](http://www.mawdy.com), as well as on the websites of its Branches and Subsidiaries, which will contain clear and easily accessible information on the Internal Information System and the use of the Internal Complaints Channel, as well as on the Entity's internal portal and/or any other means deemed appropriate to ensure its best and broadest knowledge.

## **12. TRAINING**

The Corporate Compliance Department is responsible for promoting periodic communication and training actions on the operation of the Internal Information System, and raising awareness for proper understanding and compliance with the MAPFRE, SA Internal Information System Policy and this Procedure. To this end, its actions will be coordinated with the areas responsible for training and internal communication.

## **13. APPROVAL, ENTRY INTO FORCE AND REVIEWS**

The MAPFRE, SA information management procedure was approved by the Board of Directors of MAPFRE ASISTENCIA on December 19, 2024, and the CEO and the Secretary of the Board of Directors were delegated the authority to instruct the Corporate Compliance Area to adjust it, as deemed appropriate, to MAWDY and its subsidiaries. Following this adaptation, the procedure was drafted in the present version as of March 25, 2025.

The Corporate Compliance Director, as Head of the Compliance Function at MAPFRE ASISTENCIA, will regularly review the content of this Procedure to ensure that its provisions remain valid and are duly updated and will propose any necessary modifications to the Board of Directors of MAPFRE ASISTENCIA.

**ANNEX I - INFORMATION MANAGEMENT PROCEDURE  
FROM MAPFRE ASSISTANCE, SA**

This document identifies those MAPFRE ASISTENCIA subsidiaries that do not adhere to the MAPFRE ASISTENCIA, S.A. Information Management Procedure, along with the corresponding justification.

- **MIDDLESEA ASSIST LIMITED (MALTA):** according to the Maltese regulator's interpretation of the Maltese whistleblower protection regulations ( *Whistleblower Act ( Chapter 527 of the Laws of Malta )* ) in its art 2 considers that the person responsible for managing complaints of irregularities ( "*Whistleblowing Reporting Officer - WBRO*" ) must be an employee of the entity in Malta, so it has been decided to keep MIDDLESEA ASSIST integrated into the MAPFRE Middlesea Group Procedure , in order to comply with local laws.
  
- **MAWDY LTDA (BRAZIL) :** In compliance with Brazilian regulations (articles 56 and 57 of Law No. 12,846/2013, also known as the Anti-Corruption Law, and articles 22 and 23 of its Implementing Regulations in Decree No. 11,129/22), which establishes mandatory reporting channels in the country, the Entity is integrated into the complaint resolution procedures of MAPFRE Group entities in Brazil. Therefore, it has been decided to keep MAWDY LTDA Brazil within these procedures in order to comply with local laws.

In any case, the necessary mechanisms will be established to obtain information on at least the number of complaints received, their origin, type, the results of the investigations and the resolutions adopted for communication to the Board of Directors of MAPFRE ASISTENCIA, as established in section "*10. INFORMATION TO GOVERNING BODIES*" of the Entity's Information Management Procedure.