

MAWDY

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

NOTICE: For informational purposes, the English version is a translation of the original Spanish version. In case of any discrepancies, the Spanish version shall prevail.

MAPFRE ASISTENCIA S.A. INFORMATION MANAGEMENT PROCEDURE

1 Introduction

This document contains the *Information Management Procedure* (the "**Management Procedure**" or the "**Procedure**") for Complaints or information submitted within the framework of the Internal Information System established in Mapfre Asistencia, Compañía Internacional de Seguros y Reaseguros S.A. hereinafter referred to interchangeably as Mapfre Asistencia, MAWDY or Entity.

The purpose of the *Procedure* is to establish the necessary provisions so that the Entity's Internal Information System complies with the *Corporate policy on the Internal Information System* (the "**Policy**"), as well as with the requirements set out 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.

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

2 Qualification

According to the classification set out in the *Corporate Policy on the preparation and the organization of the rules that integrate the system of corporate governance of Mapfre Group*, the present rule is a procedure general that develops the provisions of the *Corporate Policy on the Internal Information System*.

3 Scope of application

This Procedure applies to Mapfre Asistencia (including its Branches) and those of 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 (hereinafter, collectively, *Subsidiaries*).

In the event that the provisions contained in this *Procedure* are incompatible, contrary or less demanding than the legislation or regulations applicable in the jurisdiction in which the branches or *subsidiaries* adhered to this *Procedure* operate, the applicable local regulations will prevail. These branches and subsidiaries must adapt the interpretation and application of this Procedure to the requirements in force in the territories in which they operate, ensuring compliance with local obligations while maintaining the greatest possible consistency with the corporate guidelines contained in this *Procedure*.

4 Responsible for the Internal Information System

The Internal Information System Responsible is the Internal Information System Committee (the “**Committee**”), a collegiate body appointed by the *Entity* 's Board, which is responsible for its diligent management in accordance with the provisions contained in this *Procedure* and with the scope established in the *Policy*.

Therefore, corresponds to the *Committee*, the reception and processing of the Complaints or Information relating to the Entity and the *Subsidiaries* (including their admission for processing, the initiation of investigation files into the reported events, the appointment of the Investigation Investigator 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.

Likewise, the *Committee* may agree to initiate an investigation file when it becomes aware of an indication, without prior complaint, whether through a finding or through news.

The *Committee* delegates to its Secretary, under the terms and with the scope established in this *Procedure*, the powers of management of the Internal Information System and processing of investigation files of Complaints or Information, including their receipt and preliminary analysis and the keeping of the Complaints registry book.

The functioning regime of *Committee* will be regulated through 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 some of the groups mentioned and about the subjects indicated within the scope of the *Policy* have access to the *Entity*'s Internal Information System.

Notwithstanding the above, any individual may approach any external channel established by the competent Authorities in the countries in which Mapfre Asistencia or any of its *Subsidiaries* have 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* or the *Subsidiaries* have a presence or operate in commercial traffic.

The Informant may choose whether submit their Complaint or Information by identifying themselves with their personal data or anonymously, using in both

cases any of the following means (the “ **Means**”):

- Corporate platform accessible through www.mawdy.com and the respective local websites of the *Subsidiaries* and Branches.
- **Email:** sistemainternodeinformacion@mawdy.com , except in the case of MAWDY entities in Italy where it will not be possible to send a complaint through this email ¹.
- Mapfre Asistencia Internal Information System ; Ctra Pozuelo Majadahonda, 52, Building 2, Floor 0 (28220, Majadahonda, Madrid, Spain).

Complaints or information may also be submitted verbally through a meeting in person at the Informant’s request, directing their 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. Complaints or Informations made verbally may be recorded, and in all cases will be documented by means of a complete and accurate transcript of the conversation, after which the informant will be given the opportunity to check, correct and accept the transcript by signing it.

The confidentiality of the identity of the Informants and Persons Affected by the Complaint or Information, as well as the facts and data contained therein, will be ensured, even if the Complaint is received through channels or means that are not part of the Internal Information System or by individuals other than the System Responsible. For these purposes, the person who receives the complaints will ask the Informant to use the Means indicated in this Procedure and will be obliged, in all cases, to immediately send all the Information received to the System Responsible: internalinformationsystem@mawdy.com and to guarantee in the confidentiality of the information is maintained at all times.

6 Reception, admission and registration of complaints

Upon receiving the Complaint or Information through any of the indicated *Means*, the *Committee* Secretary will send an acknowledgment of receipt to the Informant that has identified him/herself and indicated a home address, email address or a secure place for the receipt of notifications, within the following seven (7) calendar days, unless this could jeopardize the confidentiality of the communication or the Informant has waived receiving information about their Complaint or Information, or has submitted it anonymously. Furthermore, the *Committee* Secretary will proceed to analyze and preliminarily evaluate the Complaint or Information and will decide, depending on the case:

¹ In accordance with Italian regulations (Legislative Decree 10/03/2023, no. 24; ANAC guidelines 12/07/2023, no. 311).

a) Inadmissibility to procedure of the Complaint either Information received, by any for the following reasons:

- (i) When the content of the Complaint refers to conduct, facts, or information that are not included within the scope of the Policy.
- (ii) When the facts are described in a generic or imprecise manner and make it impossible to investigate the alleged irregularities reported.

Before rejecting a Complaint or Report on this basis, the *Committee* Secretary will request the Informant, if the Complaint or Information was not anonymous, to clarify and specify the facts to which it refers. If the deficiencies are not remedied, the Complaint or Information 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 or Information received does not contain new or significantly different information from that contained in previous Complaints or Information regarding which the corresponding procedures have been concluded.
- (v) When there are indications that the information has been obtained unlawfully, the complaint or information will also be reported. to the The Entity's Legal Area so that, where appropriate, it may take the appropriate legal measures, after prior communication to Mapfre's Corporate Area of General Secretariat and Legal Affairs.
- (vi) When dealing with Informations related to claims about interpersonal conflicts either that affect only to the Informant and the persons to whom the Complaint refers, unless it deals with conduct that may constitute harassment.
- (vii) When the Complaint or Information refers to facts or situations that have also been communicated through an external channel or are being investigated in administrative proceedings or by the Courts of Justice.

If the Complaint or Information is rejected for any of the above reasons for rejection, the *Committee* Secretary will record the reason. of said inadmissibility in The Internal Information System Registry will finalize the file and transfer to the Informant the decision adopted, using the data of contact that, if applicable, he/she would have provided, except that he Informant had waived the right to receive communications regarding the Complaint or Information made or had submitted it anonymously.

b) Referral of the Complaint or Information received by the following reasons:

- (i) When the Complaint or Information concerns matters that clearly fall outside the scope of the Internal Information System as established in the *Policy*, such as in the case of Claims or Communications of a Commercial or Contractual Nature, which will be referred for processing through the procedures established for this purpose.
- (ii) When the Complaint or Information refers to persons or issues that are not related to the *Entity* but to another entity of the Group, in which case *Committee* Secretary will forward it to the Responsible of the Internal Information System of the competent Entity for its processing, who will send an acknowledgment of receipt to the Informant.

c) Admission of the Complaint or Information received for processing

If, after analyzing the Complaint or Information, the *Committee* Secretary considers that none of the grounds for inadmissibility or referral indicated in sections a) and b) above apply, it will be referred to the *Committee*, which will analyze whether there are reasonable indications of the alleged existence of an irregularity or infringement included in the scope of this *Procedure* and, consequently, will agree to its admission, referral or inadmissibility for processing and, where appropriate, the initiation of the corresponding investigation file and the designation of its Investigator.

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

Both the Investigator and any third party involved in any investigative actions regarding the facts referred to in the Complaint or Information will be subjected to the confidentiality obligations set out in the *Policy*.

In the case of Complaints or Informations concerning acts that could constitute harassment in any of its forms, made within the scope and reach of the Corporate Protocol for the Prevention and Treatment of Harassment, the investigation of the case shall be assigned to the Investigating Body referred to in the aforementioned Protocol, which shall carry out the investigation in accordance with the internal procedure and deadlines set out in that document. In the case of complaints or reports concerning acts that could constitute internal fraud under the terms established in the Corporate Anti-Fraud Policy, the investigation of the case shall be assigned to the Corporate Security Department, which For his part, in the case of Complaints either Information that versen about facts that could constitute internal fraud in the terms established in the *Corporate Policy for combating fraud*, the investigation of the file will be assigned to the Security Area of the *Entity*, which will carry out the investigation procedures in accordance with the provisions

of said policy.

The *Committee* shall agree to suspend the processing of the case when it becomes aware of the use of external channels or the initiation of administrative or, where appropriate, judicial proceedings concerning the same facts that are the subject of the Complaint or Information, and until their conclusion, without prejudice to providing the aforementioned authorities with the necessary information and support that may be required.

Likewise, when the Complaints or Information received, evidence provided and/or verifications and investigations practiced, reveal reasonable grounds to believe that the facts could constitute a crime, the *Committee* will agree to forward the information on them to the *Entity*'s Legal Area for the adoption of the legal measures they deem appropriate and, where appropriate, for their referral to the Public Prosecutor's Office, after prior communication to Mapfre's Corporate Area of General Secretariat and Legal Affairs.

The *Committee* Secretary will be responsible for maintaining and updating the Register of Complaints or Informations, by means of a register book in which the Secretary will record the Complaints or Informations received, the management and processing carried out, any internal investigations that may have been conducted and the Resolution adopted in relation thereto.

The *Committee* will take the necessary measures to ensure confidentiality and the protection of all data included in the Register.

Complaints or Informations processed in accordance with the Corporate Protocol for the Prevention and Treatment of Harassment, as well as the resolutions of the same by the Internal Information System Committee, shall be included in a specific section of the register book under the custody and responsibility of the Responsible of the Internal Information System.

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 relevant response to the Informant as soon as possible.

7 Investigation of the reported facts

Once a Complaint or Information has been accepted for processing, the *Committee* may decide to conduct internal or external investigations to clarify the reported facts. Likewise, the *Committee* may decide to initiate an internal or external investigation file if it becomes aware of any indication, even without a formal complaint, whether through a discovery or a piece of information.

The Investigator appointed by the *Committee* will be responsible for coordinating

and advancing the investigation process, carrying out or requesting any actions deemed necessary, requesting the required assistance and resources, and gathering any information and documentation considered appropriate to verify the accuracy and truthfulness of the information received. The Investigator may also maintain communication with the Informant and request any additional information deemed relevant to the investigation.

Based on the content of the Complaint or Information, the Affected Persons, attributed with the alleged misconduct or associated with the violation or irregularity under investigation, will have the right to be informed of the actions and omissions attributed to them and to be heard at any time in the manner and time considered appropriate to ensure the success of the investigation.

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

Notwithstanding the foregoing, the Affected Persons shall at no time be informed of the identity of the Informant nor shall they have access to the original Complaint or Information or to any other information that could reveal the identity of the Informant.

Once the relevant evidence has been gathered and the investigation has been concluded, the Investigator will prepare a report setting out the facts under investigation, the actions taken to verify the accuracy of those facts, and the conclusions reached during the investigation (the '**Report**'), which will be forwarded to the Committee.

8 Resolution of the rfile

In view of the evidence, data, investigations and conclusions contained in the Investigating Officer's Report, the *Committee* shall issue a written resolution (the "**Resolution**") determining whether the facts that are the subject of the Complaint, Information or investigation could constitute any type of infringement or irregularity and, where appropriate, the relevant actions to be taken in each case, which may consist of:

- a) The closure and filing of the case, should the Resolution conclude that the irregularity, illegality or infringement reported or investigated has not been proven or that the responsibility of the Affected Person has not been verified.

b) The transfer of the Resolution:

- (i) To the *Entity 's People and Organization Area* , 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* or of the *Subsidiaries* , so that it may decide on the measures disciplinary, corrective I preventive timely to be adopted, where appropriate, in accordance with applicable labor legislation, the adoption and content of which will be reported to the Secretary of the *Committee* who will forward it to the *Committee* .

Additionally, in the case of cases involving acts that they could to constitute harassment in any of its forms within the scope and reach of the *Corporate Protocol for the Prevention and Treatment of Harassment* , the Secretary will forward the Resolution, in all cases, to the Corporate Labor Relations Department, with anonymized personal data, 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 in it, the Resolution will also be sent to them.

- (ii) To Mapfre .S.A. Appointments and Remuneration Committee, through its secretary, when the Resolution concludes that a member of the Board of Directors of the *Entity* or one of its *Subsidiaries* has as committed any irregularity or unlawful act, for the adoption of the corresponding measures, the adoption and content of which shall be reported to the Secretary of the Internal Information System Committee who will forward it to the Committee.
- (iii) To the Entity's Legal Department when, despite the fact that the facts may not initially appear to constitute a crime, this is revealed during the investigation of the case, so that, after notifying the Corporate Department of the General Secretariat and Legal Affairs, it can assess whether to refer the matter 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 or any of its Subsidiaries has committed an irregularity or an illegal or unlawful act, so that, after notifying the Corporate Area of the General Secretariat and Legal Affairs, the appropriate contractual and/or legal measures may be taken, the adoption and content of which shall be reported to the Secretary of the Committee, who shall forward it to the Committee.

- (iv) Any other Corporate Area or department, as appropriate, based on the facts and conclusions of the Resolution, for the adoption of any other

measures deemed appropriate, the adoption and content of which shall be reported to the Secretary of the Entity's Committee, who shall forward it to the Committee. the facts and conclusions of the Resolution for the adoption of any other measures that are deemed appropriate, the adoption and content of which will be reported to the Secretary of the Entity's *Committee* , who will forward it to the *Committee* .

The Resolution must be issued and communicated to the Informant when they have identified and indicated an address, email address or secure place for receiving notifications, unless they have waived receiving information about their Complaint or Information, and to the Affected Persons, as soon as possible ²and in all case before of that finish he term of three (3) months from the date the Complaint or Information 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 dealing with facts or circumstances in which there is special complexity, at the discretion of the Committee, 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 governing body of the *Entity* or *Subsidiaries*, or if the Complaint or Information gives rise to any relevant reputational risk, the *Entity* 's *Committee* must inform the Corporate Compliance Director of the content of the Complaint or Information, its processing and its timely resolution, adopting in a coordinated manner between the *Committee* and the Corporate Compliance Director the corresponding decisions on the pertinent 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 comply with the principles of lawfulness, purpose limitation, data minimization, accuracy, storage limitation and confidentiality established in said regulations.

10 Information to governing bodies

The System Responsible will submit annually to the Audit, Risk and Compliance

² 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.

Committee (ARCC) of the *Entity* Information on the operation of the Internal Information System, which will include, at least, the number of Complaints or Information received, their origin, type, the results of the investigations and the resolutions adopted.

Notwithstanding the foregoing, the System responsible will inform the ARCC individually about the Complaints or Informations concerning financial or accounting irregularities or aspects related to sustainability that could have a material impact on the financial statements, non-financial information statements, or internal control of the *Entity* or its *Subsidiaries*.

11 Training

The Corporate Compliance Department, together with the Entity's Compliance Area, are in charge of promoting regular communication and training activities on the functioning of the Internal Information System and raising awareness for the proper understanding and compliance with the *Policy* and this *Procedure*. To this end, their actions will be coordinated with the Areas responsible for training and internal communication within the *Entity*.

12 Supervision, diffusion and follow-up of this Procedure

The *Entity's* Compliance Area is the Promoter of this *Procedure*, as this term is defined in the *corporate policy on the preparation and the organization of the rules that integrate the system of corporate governance of the Mapfre Group* .

The Entity's Compliance Area will review regularly the content of this *Procedure* in order to ensure that its provisions remain valid and are duly updated and will propose to the Board of Directors of the Entity any modifications that may be necessary.

This *Management Procedure* shall be included, together with the *Policy*, in a separate and identifiable section of the home page of the website www.mawdy.com , which shall contain clear and easily accessible information on the Internal Information System and its use, as well as on the intranet.

Where the Entity's Branches and Subsidiaries have their own websites, these documents will be published on those websites in the language of the country concerned.

13 Approval and entrance in vigor

This *Management Procedure* was approved by the Board of Directors of Mapfre Asistencia on April 23, 2025 and last modified on February 20, 2026, repealing and replacing the previously valid version.

**ANNEX I - MAPFRE ASISTENCIA S.A.
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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 interpretation made by the Maltese regulator of the Maltese whistleblower protection regulations (Whistleblower Act (Cap 527 of the Laws of Malta) in its art. 2, considers that the person responsible for managing complaints of irregularities (“Whistleblowing Reporting”) The “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 Subgroup Procedure , 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 the Mapfre Group entities in Brazil. Therefore, it has been decided to keep MAWDY LTDA Brazil within these procedures 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 “12. Information to the Governing Bodies ” of the *Entity*'s Information Management Procedure .