

MAWDY

**PROCEDIMIENTO DE GESTIÓN DE INFORMACIONES
DE MAPFRE ASISTENCIA S.A.**

PROCEDURE OF MANAGEMENT OF INFORMATION MAPFRE ASSISTANCE SA

1 Introduction

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

The purpose of the *Procedure* is establish the forecasts necessary for that the *Entity*'s Internal Information System complies with the *corporate policy about the System Internal of Information* (the "**Politics**"), So as with the requirements set out in current regulations, including the allocation of responsibilities of who must intervene in his management for the proper and diligent handling of complaints or information received.

Terms used in capital letters and not expressly defined in this document they will have the meaning that to the same HE them attributes 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 the Cluster MAPFRE*, 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 its 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, the *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 operate*

of the Entity that adhere to this *Procedure*, 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 of the System Internal of Information

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

It corresponds to the *Committee*, by so much, the reception and processing of the Complaints or Information relating to the Entity and the *Subsidiaries* (including his admission to procedure, the initiation of the investigation files of the reported events, the appointment of the Instructor from the investigation and he analysis of the conclusions of the investigation carried out), as well as its 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 discovery or through a report.

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 register book. either Information.

He regime of functioning of *Committee* It will be regulated through the corresponding regulations approved for that purpose. The Instructors of the files will attend to the meetings of the *Committee* for to provide relevant information and clarifications on the Complaints or Information whose investigation has been entrusted to them, whenever deemed appropriate.

5 Presentation of Complaints either Information

Informants have access to the *Entity* 's Internal Information System included in some of the collectives mentioned and about the subjects indicated in he scope of application of the *Policy* .

Notwithstanding the foregoing, any person may resort to 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 can choose to present his Complaint either 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 Assistance 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 face-to-face meeting at the request of the informant, 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 information provided verbally may be recorded, with the prior consent of the informant, and in all cases, will be documented through a complete transcript. and exact of the conversation maintained, after that HE will offer the Informant the opportunity to verify, rectify and accept the transcription made by signing it.

HE will guarantee the confidentiality of the identity of the Informants and Affected People by the Complaint either Information, and of the facts and data contents in the same, even if received through channels or means that are not part of the Internal Information System or by persons other than the Responsible Party of the System. To such effects, the person that receives the information will be asked to use the means indicated in this *procedure* and will be obliged, in any case, to immediately send all the information received to the System Manager via the email address internalinformationsystem@mawdy.com and to guarantee the confidentiality of the information is maintained at all times.

6 Reception, admission and record of complaints either information

Upon receiving the Complaint or Information through any of the indicated means, the Secretary of the *Committee* will send acknowledgment of receipt to the Informant that had identified and indicated a home, mail electronic either place secure for the receipt of notifications, within the period of seven (7) calendar days

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

following, 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 in a anonymous. In addition, he The Secretary of the *Committee* will proceed to analyze and preliminarily evaluate the Complaint or Information and will decide, depending on the case:

- a) Inadmissibility to procedure of the Complaint either Information received, by any for the following reasons:
- (i) When the content of the Complaint either Information HE refer to behaviors, facts either information that No HE find included inside of the scope of application 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 the Complaint or Information on this ground, the *Committee* Secretary will request to the Informant, when the The complaint or information, if not anonymous, should clarify and specify the facts to which it refers. not to result corrected the deficiencies, it will proceed to its inadmissibility, without prejudice to the subsequent initiation of an investigation, if additional information is received in accordance with the provisions of the *Policy* .

- (iii) When the Information received No result plausible, verse about manifestly facts unfounded and No accredited either HE foundation in 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 the Corporate Area of General Secretariat and Legal Affairs of Mapfre.
- (vi) When dealing with information related to claims regarding conflicts interpersonal either that affect only to the Informant and to people to the that the Complaint or Information refers to, unless it deals with conduct that may constitute harassment.
- (vii) When the Complaint either Information HE refer to facts either 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 Secretary of the *Committee* 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) Derivation of the Complaint either Information received by the following reasons:

- (i) When the Complaint or Information concerns matters that clearly fall outside the scope of the Internal System of Information according to it established in the *Policy* , as, For example, in he case of Claims either Communications of 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 Cluster, in whose case he Secretary of the *Committee* will derive to the Responsible of the System Internal of Information of the competent entity for its processing, who will send an acknowledgment of receipt to the Informant.

c) Admission to procedure of the Complaint either Information received

If, after analyzing the Complaint or Information, the Secretary of the *Committee* considers that No attends none of the causes of inadmissibility or referral indicated in sections a) and b) above, 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.

He instructor of the record (he **Instructor**) will be able to be a person of the *Entity*, of the *Subsidiaries* or a collaborator external, to criterion of the Committee, according to the nature of the reported events. You may request the collaboration of other areas at any time or have 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 he case of Complaints either Information that versen about facts that could constitute conduct or an act of harassment in any of its forms, formulated inside

of the scope of application and scope of the *Corporate Protocol for the Prevention and Treatment of Harassment*, the investigation of the case will be assigned to the Investigating Body referred to in the aforementioned Protocol, which will carry out the investigative procedures in accordance with the procedure internal and deadlines of performance collected in saying document.

For his part, in he 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.

He *Committee* will agree the suspension of the processing of the record when had knowledge of the use of external channels or the initiation of administrative or, where appropriate, judicial proceedings on the same facts object of Complaint either Information, and until his ending, without damage to contribute to the cited authorities the information and support necessary that you were required.

Likewise, when from the Complaints or Information received, evidence provided and/or verifications and investigations practiced, HE If there were reasonable grounds to suspect that the facts might constitute a crime, the *Committee* will agree refer the information about they 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 the Corporate Area of General Secretariat and Legal Affairs of Mapfre.

The Secretary of the *Committee* will be responsible for maintaining and updating the Register of Complaints or Information, through a register book. in he that will to consist the Complaints either Information received, the management and processing completed, the research internal to that, in his case, would have given rise to and the Resolution adopted on them.

He *Committee* will adopt the measures necessary for guarantee the confidentiality and the protection of all data included in the Registry.

Complaints or reports processed in accordance with the Corporate Protocol for the Prevention and he Treatment of the Harassment, So as the Resolutions of These same, by the Internal Information System Committee, will be integrated into a specific section of the register book under the custody and responsibility of the Head of the Internal Information System.

In he case of that the communication received consisted in a consultation about The interpretation and/or application of Mapfre's *Code of Ethics and Conduct* will be forwarded by *the Committee* Secretary to the Corporate Compliance Director who, after analyzing it, will send the Informant the relevant response as soon as possible.

7 Investigation of the facts

Once the Complaint or Information has been accepted for processing, the *Committee* may agree that internal or external investigations will take place to clarify the reported facts.

Committee may also agree to initiate proceedings of investigation, internal either external, in the case of have knowledge of any indication, without a complaint or information, whether through a discovery, whether through a news report.

The Instructor designated by the *Committee* will be in charge of coordinate and to promote the investigation process, carrying out or requesting the actions it deems appropriate, requesting the necessary help and resources, and gathering the information and documentation it considers necessary. to end of find out the accuracy and veracity of the Information received.

Likewise, you will be able to maintain the communications with the Informant and request any additional information you deem appropriate for the purpose of the investigation.

In function of the content of the Complaint or Information, the People Those affected, to the that HE attribute the infringing conduct or Those associated with the infraction or irregularity that is the subject of the Complaint or Information 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 *Policy* , all the rights of the Affected Persons will be respected during the processing of the case, such as the right to the presumption of innocence, the right to the honor, the right to one investigation impartial of the facts, the right of The defense has the right to use any means of evidence it deems appropriate and relevant, and the right to access the case file, under the terms established by law. This shall be understood as access to the record the right to know the facts that HE them They will be attributed 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 damage of it former, to the People Affected in none moment HE will not disclose the identity of the Informant nor will they have access to the original Complaint or Information or any other information that could reveal the identity of the Informant.

Practiced the evidence relevant and completed the investigation, the Instructor From the file, he will prepare a report that will include an account of the facts under investigation, the actions taken to verify the veracity of such facts and the conclusions obtained during the investigation (the “ **Report** ”) that will be submitted to the *Committee*.

8 Resolution of the record

TO the view of the items, data, research and conclusions working in Based on the Investigator's Report of the case file, the *Committee* will decide, by means of a written resolution (the “ **Resolution** ”), whether the facts that are the subject of the Complaint, Information or investigation could or could not constitute any type of infraction or irregularity and, where appropriate, the relevant actions to be carried out in each case, which may consist of:

- a) The conclusion of the file and its archiving , in the event that the Resolution concluded that the irregularity, illegality either infringement reported or investigated No ha been accredited either No HE ha verified the responsibility of the Affected Person.
- b) He 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 he case files that versen about facts that they could to be constitutive of a conduct either act of harassment in any of their modalities, formulated inside of the scope of application and Within the scope of the *Corporate Protocol for the Prevention and Treatment of Harassment* , the Secretary of the *Committee* will forward the Resolution, in any case, to the Corporate Directorate of Labor Relations of Mapfre SA, with the personal data anonymized, for the purposes of give compliance to the obligations of report established in accordance with 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 sent to them.

- (ii) To the Appointments and Remuneration Committee of Mapfre SA, through its secretary, when the Resolution concludes that a member of the Board of Directors Administration of the *The Entity* or one of its *Subsidiaries* has task some irregularity either illicit or unlawful act, for the adoption of the corresponding measures, the adoption and content of which will be reported to the Secretary of the Internal Information System Committee who will forward it to the Committee.
- (iii) To the Legal Department of the *Entity* when, even though it was not initially apparent that the facts could constitute of crime, So it will turn out of the instruction of the record, so that – after prior communication to the Area Corporate of Secretariat General and Matters Legal - consider referring the matter to the Public Prosecutor's Office (or to the European

Prosecutor's Office if there is an impact on the financial interests of the European Union), 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 of any of the *Subsidiaries* has committed some irregularity either some act illicit either contrary to the law, for – prior communication to the Area Corporate of Secretariat General and Matters Legal - adoption of the contractual and/or legal measures that are appropriate, and will inform the Secretary of the *Committee of their adoption and content* , which will forward it to the Committee.

- (iv) TO any other Area Corporate either department that proceed in function of 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.

² In the case of MAWDY entities in Portugal and pursuant to Article 11.º/4 GDPR, the Informant may request the result of the analysis carried out on his complaint, which will be communicated to him within a maximum period of fifteen (15) days after the conclusion of said analysis.

9 Protection of data personal

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 the organs of government

The System Manager will submit annually to the Audit, Risk and Compliance Committee (CARC) 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, it will inform the CARC individually about the Complaints either Information that versen about irregularities of a financial, accounting or sustainability nature that could have a material impact on the financial statements, non-financial information statements or the internal control of the *Entity* or its *Subsidiaries* .

11 Training

The Address Corporate of Compliance jointly with the Compliance Area in charge of the *Entity* are the in charge of boost Periodic communication activities, training on the operation of the Internal Information System, and awareness-raising to ensure 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 Compliance Area in charge of the *Entity* 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 he system of corporate governance of the Mapfre Group* .

The Compliance Area in charge of the *Entity* will review regularly he 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.

He present *Procedure of Management* will be including, together with the *Policy* , in a separate and identifiable section of the homepage of the website

www.mawdy.com that will contain information clear and easily accessible information about the Internal Information System and its use, as well as on the internal portal.

To the extent that 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 - MANAGEMENT PROCEDURE
INFORMATION FROM MAPFRE ASISTENCIA, SA**

This document identifies those Mapfre Asistencia subsidiaries that do not adhere to the Mapfre Asistencia SA 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 .