



**EXTRACT FROM THE CRIMINAL PREVENTION MODEL
OF MAPFRE ASISTENCIA COMPAÑÍA INTERNACIONAL
DE SEGUROS Y REASEGUROS, S.A.**

WARNING: *The English version is only a translation of the original in Spanish for information purposes. In case of discrepancy, the Spanish version shall prevail.*

**EXTRACT FROM THE CRIMINAL PREVENTION MODEL OF MAPFRE
ASISTENCIA COMPAÑÍA INTERNACIONAL DE SEGUROS Y REASEGUROS,
S.A.**

1 Introduction

The *Crime Prevention Model of MAPFRE ASISTENCIA COMPAÑÍA INTERNACIONAL DE SEGUROS Y REASEGUROS, S.A.* ("**MAWDY**" or the "**Entity**") is the basis of the criminal risk prevention system adopted by the Entity, and details the design and structure of the system implemented to prevent the commission of crimes within it (the "**Model**" or the "**Prevention Model**").

The *Model* confirms the commitment to the ethical-business culture of the Entity and its managers, highlighting the firm commitment to good governance and due control for the proper management and prevention of criminal risks that may arise from bad practices or regulatory breaches in the development of its activities, with a special focus on those regulatory aspects with criminal significance. in order to prevent and mitigate the commission of crimes in the Entity.

This document describes the guidelines for the Entity's action to comply with the exercise of due control and duty of vigilance over its business activity, indicating the criminal risks to which it is exposed, and establishing the guidelines for its management and for the evaluation of the controls implemented to mitigate the crimes under its scope.

This document has been prepared on the basis of the *Crime Prevention Model* approved by MAPFRE, S.A., which constitutes the general framework of reference for all the entities of the Mapfre Group (hereinafter, the "**Group**" or "**Mapfre Group**").

In accordance with the provisions of the *Policy defining the bases and organisational principles of the Mapfre Group*, the Group has a decentralised corporate structure, on which a governance model governed by principles is articulated that adequately establishes the functions of Mapfre, S.A. with respect to the other entities of the Group. The Group also has a business structure subject to a rigorous control and supervision system at all levels – local, regional and global – which allows for extensive delegation in the execution and development of the competencies assigned to the teams and their managers.

This approach ensures the effective application of the principle of decentralization in the strategic direction and management of businesses.

In the context of this decentralised structure – and in firm application and development of the principle of zero tolerance for possible criminal offences, and in order to promote an ethical and responsible business culture in the companies of the Mapfre Group – each entity of the Group is responsible and must approve and implement its own *Prevention Model* in accordance with the criteria established in the *Model* approved by Mapfre, S.A., without prejudice to its adaptation to the applicable regulations.

Consequently, the Board of Directors of MAWDY, as the body competent to approve the *Crime Prevention Model*, at the proposal of the Audit, Risk and Compliance Committee, in accordance with the *Regulations of the Board of Directors of MAWDY* and the *Compliance Policy*, has approved this *Crime Prevention Model*, which is a compliance program that aims to describe the bases of an organization and management model that includes the principles that underpin the Entity's actions with the aim of preventing potential criminal liability.

2 Rating

In accordance with the classification set out in the *Corporate Policy on the preparation and organisation of the standards that make up the Mapfre Group's corporate governance system*, this document is a general company-wide procedure that develops the provisions of the *Compliance Policy* approved by the Entity's Board of Directors.

3 Purpose

The *Prevention Model* aims to:

- a) Establish a structured and organised system of prevention and control aimed at reducing the risk of committing crimes.
- b) To make the *Prevention Model known* to all the personnel included in its scope of application, in relation to:
 - a. The importance of regulatory compliance and the ethical principles contained in the Entity's internal regulations in the performance of its functions.
 - b. The obligation to comply with the *Prevention Model* approved by the Entity.
- c) Define the necessary guidelines to adapt control measures, in order to prevent the commission of criminal offences more effectively.

4 Scope of application

This *Prevention Model* is applicable to the legal representatives of the Entity, its corporate administrators, its directors, as well as its employees and other persons who are subject to the authority or instructions of the aforementioned persons or who operate within its scope of management, supervision, surveillance or control. Groups that act in the name, on behalf of, or in any way in the interest of the Entity are included.

5 Criminal liability regime for legal persons

5.1 Crimes that can be committed by a legal person

The criminal liability of legal persons was introduced into the Spanish Criminal Code by *Organic Law 5/2010 of 22 June 2010 amending Organic Law 10/1995 of 23 November 1995 on the Criminal Code*, which entered into force on 23 December 2010.

Subsequently, on 1 July 2015, *Organic Law 1/2015, of 30 March, came into force, amending Organic Law 10/1995, of 23 November, on the Criminal Code*, regulating the guidelines that must be followed by entities to be exonerated from criminal liability for having adequately exercised their duties of surveillance and control.

Article 31 bis of the Criminal Code provides that legal persons may be held criminally liable:

- a) Crimes committed in the name or on behalf of them, and for their direct or indirect benefit, by their legal representatives or by those who, acting individually or as members of an organ of the legal person, are authorized to make decisions on behalf of the legal person or hold powers of organization and control within it.
- b) Crimes committed, in the exercise of social activities and on behalf of and for the direct or indirect benefit thereof, by those who, being subject to the authority of the natural persons mentioned in the previous paragraph, have been able to carry out the acts because they have seriously failed to comply with the duties of supervision, surveillance and control of their activity in view of the specific circumstances of the case.

The Entity assumes a clear commitment to prevent the commission of crimes within it. In this regard, the Entity carries out an exhaustive analysis of its operations and activities to identify the criminal risks to which it is exposed, delimits which criminal conduct may generate liability, identifies the areas where the identified crimes may materialize and reviews the

procedures implemented to prevent, prevent or mitigate the risk of committing such conduct. in accordance with the *Compliance Policy*.

A catalogue of the criminal risks referred to above is included as an annex to this document, as well as the main surveillance and control measures established to prevent or mitigate the occurrence of such risks (the "**Catalogue**").

5.2 Penalties or ancillary consequences applicable to legal persons

The penalties or ancillary consequences that may be imposed on legal persons in accordance with *articles 33.7 and 129 of the Criminal Code* are:

- a) Fine by installments or proportional.
- b) Dissolution of the legal entity.
- c) Suspension of their activities for a period not exceeding five years.
- d) Closure of their premises and establishments for a period that may not exceed five years.
- e) Prohibition of carrying out in the future the activities in the exercise of which the crime has been committed, favored or concealed.
- f) Disqualification from obtaining subsidies and public aid, from contracting with the public sector and from enjoying tax or Social Security benefits and incentives, for a period that may not exceed fifteen years.
- g) Judicial intervention to safeguard the rights of workers or creditors for the time deemed necessary, which may not exceed five years.

5.3 Disclaimer

For the crimes that may give rise to criminal liability of the legal person, to which reference is made in the *Catalogue, article 31 bis of the Criminal Code* establishes, as a cause for exemption from criminal liability, the fact that there is a prevention model that allows the risk of committing crimes to be avoided or significantly reduced.

In order for this model to be considered effective, it must meet the following requirements:

- i) Identify the activities in which the crimes that must be prevented may be committed.

- ii) To establish the protocols or procedures that specify the process of forming the will of the legal person, of adopting decisions and of executing them in relation to them.
- iii) Have adequate financial resource management models to prevent the commission of the crimes that must be prevented.
- iv) Impose the obligation to report possible risks and non-compliance to the body in charge of monitoring the operation and observance of the prevention model.
- v) Establish a disciplinary system that adequately punishes non-compliance with the measures established by the model.
- vi) Carry out a periodic verification of the model and its possible modification in the event of relevant infringements, changes in the organisation, in the control structure or in the activity carried out.

In accordance with the above, if any of the aforementioned crimes are committed and it is proven that the Entity has had a suitable model and that it applies it effectively, it will be exempt from criminal liability. If the model is not fully satisfactory or has not been applied to the appropriate degree, the exemption will not be full but liability may be mitigated.

6 General prevention tools

The Entity has solid procedures for the identification, management, control and communication of the risks to which it may be exposed, as well as adequate internal control mechanisms, including reliable administrative and accounting procedures. It also has a corporate governance system that constitutes the basis on which the control system integrated into the Prevention Model is structured and developed.

The Entity has, among others, the following prevention instruments:

- Internal regulations: In accordance with the *Policy on the preparation and organization of the standards that make up the Mapfre Group's corporate governance system*, there are the following types of regulations:
 - The "Policies" establish principles, objectives and guidelines for general action in a given matter or sector of activity.
 - The "Regulatory Standards for the Functioning of Government Bodies" set out the responsibilities and powers assigned to each body.

- The "General Procedures" develop the provisions of the Policies and Regulatory Standards for the Functioning of the Governing Bodies, including specific guidelines for action.
- The "Organizational Documents of an Area, Directorate or Function" describe and systematize the activity and processes of an area, direction or function. They can take the form of manuals or protocols.
- Corporate governance system: Guarantees adequate management and control, with broad participation of directors and managers in decision-making. This management model favours the delegation of functions and powers, ensuring that the most relevant decisions, at all levels, are rigorously analysed, both before and after their execution, by the corresponding management teams.

6.1 Internal regulations

- ***Institutional and Business Principles of the Mapfre Group ("Institutional Principles")***. Approved by the Board of Directors of Mapfre, S.A. They constitute the minimum framework of mandatory compliance for all the Group's entities and their respective governing bodies, which must adapt their internal regulations and their actions to the principles and rules defined therein.
- ***MAWDY's bylaws***, which, among other aspects, regulate the decision-making processes of the statutory governing bodies and establish rules relating to the control and supervision of the Entity's activities and operations.
- ***Regulations of the Board of Directors of MAWDY***, which regulate the functioning of its Board of Directors and other statutory bodies. In accordance with these regulations, the Board of Directors of the Entity is responsible for ensuring that the corporate culture is aligned with the *Institutional Principles*.
- ***Code of Ethics and Conduct***. It is inspired by the *Institutional Principles* and aims to reflect the corporate values and basic principles that must guide the actions of the Mapfre Group and its members.
- ***Corporate policy of the Internal Information System***, which establishes the fundamental principles that govern the operation of the Internal Information Systems of the companies of the Mapfre Group as the ideal and preferential channel for communicating information or complaints about possible irregularities or acts committed within it that are

potentially illegal, contrary to the law or to the values and rules governing the Entity's behaviour set out in *Code of Ethics and Conduct*, in accordance with the applicable regulations.

- **Internal Code of Conduct in the Securities Markets**, which regulates the specific rules of conduct that must be known and complied with by all persons included in its scope of application in relation to the securities issued by Mapfre, S.A. and, where appropriate, with those of other entities of the Group listed on secondary markets.
- **Other internal corporate rules.** The Entity has a wide range of internal corporate rules that regulate essential aspects for its good governance and operation. These standards cover, among others, matters related to organisation and corporate governance, ethics and integrity (including anti-corruption, human rights and anti-fraud policies), tax and financial management, diversity and equal opportunities, occupational health, safety and well-being, data protection and cybersecurity, as well as sustainability and respect for the environment. It also includes guidelines on procurement of goods and services, management of conflicts of interest, procurement procedures, corporate operations and digital operational resilience.
- **Solvency Policies II.** In accordance with the provisions of the *Solvency II Directive*, the Entity has all the written policies established in the regulations and must guarantee their application.
- **Internal and external audit reports**, relating to the verification of financial statements, the application of data protection, security and environmental regulations, etc.
- **Continuous training.** The Entity's Compliance Officer is responsible for raising awareness among its staff and ensuring their continuous training through the training plan implemented. To facilitate this work, the Mapfre Group provides them with a global training tool. Specifically, the Group has a global training model that is organised through Knowledge Schools of the Corporate University, under which the training programmes that are developed at a global and local level are brought together. Under the e-learning modality, courses are taught, among others, on the *Code of Ethics and Conduct* and internal control standards, auditing training actions and a specific course on the Compliance Function, which makes this function, its objectives and responsibilities known, stressing the importance of its implementation to minimize the legal risk and non-compliance to which entities are exposed.

- **Corporate sustainability.** The Mapfre Group has a mandatory regulatory framework in the field of sustainability, applicable to all its entities and their respective governing bodies. This framework establishes the guidelines that allow any entity to develop and promote socially responsible behaviour, regardless of the form – conventional and/or digital – in which the business is carried out and the country in which it operates. The internal regulations include principles of action that are transversal to the entire organization, which constitute the basis for building a global commitment to sustainability and sustainable development.
- **Corporate website.** Through the corporate website of Mapfre, S.A. www.mapfre.com are made public, among others, the *Institutional Principles* and the *Code of Ethics and Conduct*, which are corporate in scope and applicable to the Entity.
- **MAWDY website.** Through the www.mawdy.com website, the Entity makes available to its stakeholders access to the Internal Information System and other relevant data.
- **Other rules and procedures.** There are rules and procedures that regulate specific matters, the objective of which is to prevent the commission of criminal conduct. They cover, among others, matters related to corporate organization and governance, including directors' remuneration and procedures for the management and approval of related-party transactions. They also contemplate aspects of economic management and human resources, including the prevention and treatment of harassment. In the digital sphere, the right to disconnection, telematic use, data protection and governance, cybersecurity and external data management are regulated, reinforcing operational resilience. It also regulates matters related to communication and digital marketing, and includes guidelines on customer relations.

6.2 Internal governance

a) Administrative and supervisory bodies

The Entity has the following bodies that carry out control and monitoring tasks:

- **General Shareholders' Meeting:** it is the highest governing body of the Entity through which the corporate will is manifested. It is governed by the provisions of the law, the statutes of the Entity and its own regulations, as well as the rules that develop them.

- **Board of Directors:** is the highest administrative and representative body of the Entity and focuses its activity, within the terms of the applicable regulations, on supervising the ordinary management, effective management and control of the Entity's business, in accordance with the general strategic guidelines and policies established by Mapfre, S.A. and under its supervision. organization and coordination.
- **Executive Committee:** acts as a delegated body of the Board of Directors. It has all the powers of the Board of Directors on a permanent basis, except those that are legally non-delegable.
- **Audit, Risk and Compliance Committee:** it is attributed, among others, to powers in matters of internal control, internal auditing, risk management, financial reporting, auditing of accounts and compliance.

In relation to compliance, it oversees the activity of the Compliance Function. In addition, among others, it reports on the *Entity's Compliance Policy* and *Crime Prevention Model*, ensuring that it is aligned with the general standards and policies with projection at the Group level; supervises the Entity's Internal Information System, in accordance with the provisions of internal regulations; and verifies the adoption of actions and measures that are a consequence of reports or inspection actions before the administrative authorities of supervision and control.

- **Management Committee of the Assistance and Services Unit:** this is the body that promotes the development and execution of the assistance and services business, as well as its different initiatives, under the supervision of the Executive Committee of Mapfre S.A.

b) Other non-management bodies of the Entity

The Entity also has other non-management bodies, which perform relevant functions for the proper management of its activities:

- **Technical Control Committee:** its mission is to supervise the activity of the Technical Sub-Directorate General and the main technical indicators of the Entity.
- **Product Management Committee:** its main objectives are:
 - Approve and be responsible for establishing, implementing, and reviewing the process for approving new products or modifying existing ones;

- Continuously verify internal compliance with this process and, where appropriate, modify it.
- Review, update and approve the internal regulations applicable to the control and governance of insurance products.
- To approve, where appropriate, the creation of new insurance products or significant adaptations to be made to existing products.
- To constitute, when it deems it necessary, a working group made up of representatives of the areas that are members of the Committee, in order to prepare the preparatory work and the corresponding documentation on the matters to be analyzed at each meeting.
- **Security, Crisis and Resilience Committee:** specific committee, of an operational nature and subordinate to the Security and Business Continuity Committee. It has management and control functions in the field of privacy and data protection of the Entity, supporting the *Data Protection Officer* (DPO) in the development of their responsibilities.
- **IT Operational Committee of the Assistance Unit (COI):** reviews economic and service provision aspects of the Corporate Technology and Data Area (ACTD) to the assistance and services business and the status of its main projects.
- **Data Operating Committee:** defines the planning of the data governance strategy and execution plan and its key elements. It is the body responsible for the regulatory framework for governance and data quality in the Entity, and acts as a link between the strategic level and the operational levels.

c) Other committees of the Mapfre Group

The Mapfre Group has other non-management bodies, which perform relevant functions for the proper management of its activities:

- **Sustainability Operating Committee:** the Mapfre Group has a Sustainability Operating Committee, as a body dependent on the Executive Committee of Mapfre S.A., which is configured as an internal body, with executive functions and powers of information, advice and proposals on sustainability matters, in accordance with the powers attributed in its regulatory standards. Among its responsibilities, it monitors international sustainability initiatives and the commitments acquired by the Mapfre Group at all times, as well as evaluating and proposing, where appropriate, to the corresponding body, the adherence to new initiatives that fit into the Group's sustainability strategy.

- **Security, Crisis and Resilience Committee:** is tasked with ensuring that business objectives and needs govern the activity of the Corporate Security Function, as well as ensuring that the recommendations of the Corporate Security Function are taken into account in business processes. It also has powers in terms of management and control in the field of business continuity and crisis management.
- **Global Business Committee:** in charge of analyzing the development of the insurance and services businesses of the Mapfre Group in the world, compliance with the established plans and in charge of proposing actions to correct and improve these.
- **Subscription Policy Committee of the Mapfre Group:** whose main objective is to promote, develop and update the Subscription Policy.
- **Procurement Committee:** intervenes, directs and coordinates the work to be carried out in each acquisition or divestment process, such as the technical assessment, the development of *due diligence* (exhaustive due diligence procedures are carried out on potential business partners, also in matters of corruption and bribery), the negotiation of contracts and the closing of the operation.

It also operates as a consultative body, providing its assessment to the competent governing bodies in the final decision on this acquisition or divestment.

Its actions are governed by the following objectives: rigour in the process of a potential acquisition, efficiency in the resources applied to acquisition operations, objectivity in information and valuations, prior study of the possible consequences of acquisitions and subsequent monitoring and evaluation of compliance with estimates.

- **Transformation and Innovation Committee:** Delegated body of the Executive Committee of Mapfre, S.A., specialized in technological transformation and innovation, which is responsible for the powers attributed to it at any time by the Executive Committee in these matters.
- **People Committee:** set up to promote coordinated action in terms of selection, appointment, professional development and remuneration of management staff. Its decisions are aimed at achieving the strategic objectives established by the Board of Directors of Mapfre, S.A.
- **Mapfre Group Ombudsman:** body for the protection of the interests of the users of the Group's companies that are adhered to the *Regulations*

for the resolution of conflicts between the companies of the Mapfre Group and the users of its financial services, which hears and resolves the claims made by the users of the Mapfre Group's financial services and forwards the following to the companies' management bodies. recommendations that it considers appropriate to improve its contractual relations with users.

d) Internal Control System

The Entity has established an appropriate system of internal control in accordance with its organization, with an adequate structure and appropriate reporting mechanisms at all levels of the Entity.

e) Key functions of the Governance System

In accordance with the provisions of *Article 65 et seq. of Law 20/2015, of 14 July, on the Regulation, Supervision and Solvency of Insurance and Reinsurance Entities (LOSSEAR)*, the Entity has an effective governance system that guarantees the sound and prudent management of the activity, proportional to its nature, volume and complexity of its operations. which includes the following key functions: risk management, actuarial, compliance verification and internal audit.

f) Model of the three lines of defense

The Entity has adopted the model of the three lines of defence for risk management:

- i) A first line of defense made up of employees, management and operational, business and support areas that are responsible for maintaining effective control over the activities they carry out as an inherent part of their day-to-day work. They are, therefore, the ones who assume the risks and are responsible for designing and implementing the necessary control mechanisms to mitigate the risks associated with the processes they carry out and to ensure that the risks do not exceed the established limits.
- ii) A second line of defense is made up of the Risk Function, the Actuarial Function, the Compliance Function and other assurance functions, which ensure the operation of the internal control and risk management systems.
- iii) A third line of defence is the Internal Audit Function, which carries out the independent assessment of the adequacy, adequacy and

effectiveness of the internal control and risk management systems, communicating any deficiencies in a timely manner to the parties responsible for implementing the corrective measures, including senior management positions and governing bodies as appropriate.

7 Supervision and control of the *Model*

The supervision of the operation and compliance with this *Model* corresponds to the Entity's Compliance Officer, under the terms established by the approved *Compliance Policy*, which aims to ensure that the Entity operates within the regulatory compliance framework in order to achieve a global compliance environment.

To this end, the Compliance Officer identifies, assesses, monitors and reports on the exposure to the risk of non-compliance of the activities carried out. The risk of non-compliance is defined as the risk of legal or regulatory sanctions, material financial losses or reputational losses that the Entity may suffer as a result of non-compliance with laws and other internal and external regulations, rules and standards or administrative requirements that are applicable in its activity.

The effective management of these risks is considered a basic driver for the sustainable and profitable growth of the Entity, helping to protect its solvency, integrity and reputation, and supporting the achievement of its strategic objectives.

In this regard, the Compliance Officer carries out the function of supervision and control of the *Prevention Model* in the Entity, carrying out the following activities in the field of criminal prevention:

- i) Supervise the operation and effectiveness of the *Model* and ensure compliance with it in the Entity.
- ii) Identify the activities in which the crimes to be prevented may be committed, as well as evaluate the existing controls for their mitigation and propose, where appropriate, the pertinent recommendations, adopting and/or proposing the adoption of the appropriate measures to ensure compliance with the *Model*.
- iii) To report periodically to the Board of Directors of the Entity, through the Audit, Risk and Compliance Committee, of any significant incidents or anomalies related to the Entity's *Model* and, in particular, to inform it of any insufficiency of the resources allocated to ensure its effective application.

- iv) Prepare a *Compliance Verification Plan* for the supervision of the *Model* and propose its approval to the Board of Directors of the Entity, following a report from the Audit, Risk and Compliance Committee.
- v) To report to the Board of Directors of the Entity, through the Audit, Risk and Compliance Committee, of the action plans established, indicating the initiatives and measures to be adopted in the year and review of the activities pending to be carried out during the previous year.
- vi) Identify, where appropriate, new areas of risk and implement and maintain systematic procedures for reviewing the Entity's *Model* in order to provide the Entity's governing bodies with a reasonable level of assurance with respect to its monitoring, compliance and sufficiency.
- vii) Guarantee the dissemination and training of the principles of the *Model*, with the collaboration of the People and Organization Area.
- viii) To periodically modify or update the Entity's *Model* and the internal procedures and rules that are part of it in the event of relevant infractions, changes in the organization, in the control structure or in the activity carried out.
- ix) Inform the Corporate Compliance Management of Mapfre, S.A. about compliance with the obligation to approve with a *Crime Prevention Model*.

To this end, it has personnel with sufficient professional knowledge and experience, has the appropriate technical means and has access to the internal processes, necessary information and activities of the Entity, in order to guarantee the correct execution of the entrusted function.

8 Methodology for criminal risk management

The *Prevention Model* must be evaluated periodically to test its implementation and effectiveness.

The criminal risk management process is a homogeneous process that allows the Compliance Officer to carry out the aforementioned periodic evaluation to prove such implementation and effectiveness, evaluate the criminal risks to which the Entity is exposed, identify the processes and activities in which the crimes that must be prevented can be committed, identify and evaluate the controls implemented to prevent the commission of such crimes and establish a review of the effectiveness of the *Model*.

The main phases of this management process are detailed below:

MAWDY

- i) Risk identification.
- ii) Assessment of inherent risk.
- iii) Residual risk assessment.
- iv) Determination of risk appetite.
- v) Conclusions and action plan.
- vi) Continuous monitoring and improvement.

The Compliance Officer periodically verifies that the controls implemented to mitigate the risk of committing crimes are in force and are adequate and sufficient. To this end, in accordance with the provisions of the *Compliance Policy*, it prepares an annual *Report of Actions*, which details, among others, the management of the risk of non-compliance, which specifies the status of the existing controls to mitigate each of the crimes that may be committed within its activity and the result of the verification carried out in that year.

9 Model Update

The Compliance Officer conducts an ongoing review of this document and the accompanying *Catalogue*, and updates it as necessary to ensure that its provisions remain valid and up-to-date. In this regard, it will propose to the Board of Directors the modification or updating of the *Prevention Model* in the event of relevant infringements or changes in the organisation, in the control structure or in the activity carried out and will inform it periodically and, in any case, through the *Actions Report* that it prepares annually, of the remaining modifications or updates to the *Model*.

10 Resource Management

The *Entity's Prevention Model* is equipped with the relevant financial, material and human resources necessary for its correct and effective operation.

The Compliance Officer reports, on an annual basis, to the Audit, Risk and Compliance Committee, for submission to the Board of Directors of the Entity, on the annual budget of the function necessary for its proper execution, as well as on the sufficiency of resources or means (material, economic and/or personal) available to the Entity to maintain an adequate level of control of the activities that generate criminal risks and mitigate the risk of committing unlawful conduct.

11 Internal Information System Committee

The Internal Information System Committee is responsible for the Entity's Internal Information System. It is a collegiate body, appointed by the Entity's administrative body.

This Committee allows the Entity to act diligently in the event of a possible breach of the *Model*, following a procedure for acting in the event of suspicious activities.

Its composition and operation are regulated in the *Corporate Policy of the Internal Information System* and in the *Information Management Procedure of the MAWDY Internal Information System* approved by the Entity.

The appointment and dismissal of the members of this Committee are communicated to the Independent Authority for the Protection of Whistleblowers, in accordance with the regulations in force.

12 Non-compliance with the *Model*: notifications of suspicious actions and sanctioning procedure

The existence of channels for reporting internal breaches or illicit activities is one of the key elements of the *Entity's Prevention Model*.

Any person, including employees of the Entity, who has indications or suspicions of possible irregular conduct or acts that are potentially unlawful or contrary to the law or internal regulations within the Entity, including, in particular, any conduct that could constitute a crime, serious or very serious administrative offence or infringement of European Union law, they must be reported through the Internal Information System enabled.

Without prejudice to the autonomy and independence of the Entity and its own *Internal Information System*, the Compliance Officer must inform the Corporate Compliance Director of the complaints that, in view of the possible impact on the Mapfre Group as a whole, are determined in the Entity's *Information Management Procedure*.

Maximum confidentiality is ensured about the identity of the whistleblower and any person included in the report, and reasonable support and protection measures are taken to protect whistleblowers against all forms of retaliation or attempted retaliation, in the terms provided for in the applicable regulations, without prejudice to legal obligations and the protection of the rights of natural or legal persons against those in which a false complaint or information or bad faith is presented.

Failure to comply with the internal regulations that incorporate the company's organisation and management model, and in particular with the measures established for the surveillance, control and prevention of crimes referred to in this *Model*, constitutes a labour offence and may be subject to sanctions. For groups that act in the name, on behalf of, or in some way, in the interest of the Entity, their violation may result in the termination of their contractual relationship. All this without prejudice to the administrative or criminal sanctions that, where appropriate, may be applicable.

The sanctioning procedure for the Entity's employees is applied by the People and Organization Area in accordance with the disciplinary regime provided for in the collective agreement and in the applicable labor regulations. Without prejudice to this, the appropriate resolutions must be adopted to ensure that the established disciplinary regime is applied effectively.

13 Model Documentation

The implementation and development of the *Prevention Model* must be documented. Such documentation must be kept for at least the following 10 years, or until the end of the corresponding statute of limitations for the offence whichever is longer.

The duty to keep the aforementioned documentation during the period indicated is the responsibility of the Compliance Officer.

14 Training

The Entity includes in its training plans, specific training actions in the field of criminal risk prevention, managed by the Compliance Officer in coordination with the People and Organization Area.

15 Monitoring, dissemination and follow-up

The Compliance Officer is the Promoter of this *Model*, as this term is defined in the *Corporate Policy on the preparation and organization of the standards that make up the Mapfre Group's corporate governance system*.

The dissemination of the *Prevention Model* is the responsibility of the Compliance Manager in collaboration with the People and Organization Area.

The Compliance Officer guarantees that this *Prevention Model* is made available to all employees of the Entity, through its inclusion in the Intranet.

Likewise, the *Mapfre Group's Institutional and Business Principles* and the *Code of Ethics and Conduct* are available on the corporate website of Mapfre, S.A., and an extract of this *Prevention Model* on the Entity's website, so that any third party is aware of the Entity's interest in the prevention of crime within it and can communicate, through the channel enabled for this purpose, the possible commission of crimes or conduct contrary to the internal regulations of the Entity.

16 Approval and entry into force of the Model

This *Model* was initially approved by the Board of Directors of the Entity on December 14, 2017 and last modified on February 20, 2026, repealing and replacing the version previously in force.