

## **INTERNAL**

### **INFORMATION SYSTEM POLICY OF MAPFRE, S.A.**

#### **1. PURPOSE AND SCOPE**

This Policy establishes the fundamental principles governing the operation of the Internal Information System of MAPFRE, S.A. (hereinafter, MAPFRE) as a suitable and preferred channel for communicating information or reports on possible irregularities or acts committed within it that are potentially illegal and contrary to the law, values, and/or regulations governing MAPFRE behavior contained in the Code of Ethics and Conduct.

Thus, it reflects the commitment expressed by MAPFRE to ensure that the actions of its members meet demanding standards of professionalism, integrity, and sense of responsibility,

Integrity, understood as a requirement for ethical, transparent, and socially responsible conduct, is one of the essential values of MAPFRE and the core of the behavior of everyone who works in or for MAPFRE (executives, employees, agents, and collaborators). It is also part of the Institutional and Business Principles of the MAPFRE Group and the Code of Ethics and Conduct that have been approved by the Board of Directors of MAPFRE and which are also reflected, among others, in the Corporate Sustainability and Compliance Policies.

This Policy defines and implements MAPFRE's institutional commitment to conduct all its activities and businesses in accordance with strict ethical behavior and compliance with current legislation and the clear rejection of any illegal or fraudulent practice that may occur within it, in any of the territories in which it operates.

The implementation of this commitment requires, among other aspects, strict compliance with laws and the obligations arising from them, as well as the establishment of specific mechanisms to enable individuals who become aware of irregular or illegal actions to report them to MAPFRE, even anonymously and with full guarantees of confidentiality and protection against retaliation. This applies to acts or behaviors within MAPFRE that are contrary to general, internal, or sectoral regulations applicable to the organization. In this way, and after due verification of the irregularity or noncompliance reported, the appropriate measures may be taken not only to repair its consequences but also to prevent them from recurring in the future.

This Policy applies to MAPFRE, S.A. and the other Group companies, without prejudice to any strictly necessary adaptations that these companies may implement to ensure compatibility and compliance with sector-specific regulations, applicable legislation, or supervisory requirements in the countries where they operate. It also includes the establishment of appropriate coordination measures to align with such regulations and requirements.

In accordance with the principles set forth in this Policy, the Group Companies establish their respective Internal Information Systems, which integrate all channels enabled within each company for the communication of Complaints. These channels are understood to include all means, procedures, and structures established by each Company to allow Informants to submit their Complaints. Notwithstanding the foregoing, certain Group companies, taking into account their size, geographical scope, and nature of their activity, may share their Internal Information System and the resources allocated to the management and processing of Complaints, which will always comply with the principles and criteria established in this Policy.

This Policy is supplemented by the Information Management Procedure (the “**Management Procedure**”) of MAPFRE, S.A.

Each Internal Information System is governed by the Guiding Principles for the protection of Informants outlined in this Policy. It has a designated Supervisor responsible for its operation and a Procedure for Managing the Information received, which the various companies within the MAPFRE Group must develop and approve through their respective governing bodies, in accordance with the provisions of section 7 of this Policy.

Any internal communication channel available to Group companies for receiving information or that may be created in the future for this purpose must be integrated into the corresponding Company's Internal Information System and, therefore, adapted to the principles established in this Policy.

In the subsidiaries of Group Companies where the Group does not have effective control, the implementation of principles and rules of conduct consistent with those established in this Policy will be promoted, to the extent possible.

## 2. DEFINITIONS

For the purposes of this Policy, the following definitions apply:

- **Group Companies or Companies:** MAPFRE, S.A. and its subsidiaries and affiliates in accordance with the provisions of commercial legislation.
- **Complaint or INFORMATION:** Communication of possible irregular conduct or potentially illegal acts or acts that violate the law or internal regulations within the Group's Companies, including, in particular, any conduct that could constitute a crime, serious or very serious administrative violation, or violation of European Union law, among others, and any form of harassment.
- **Informant:** Any person who has obtained or conveys the information stated in the Complaint, including employees, professionals, shareholders, participants, members of the governing, management, or supervisory bodies of the Group's Companies, as well as volunteers, interns, and trainees, service providers, clients, and any third party in the process of acquiring any of the aforementioned statuses or having lost it.
- **Affected Person:** The natural or legal person referred to in the Complaint for the purpose of attributing the referenced conduct or associating with the Information.
- **System Supervisory Body or Supervisor:** The body designated by the Group companies to manage its Internal Information System, with the functions and responsibilities indicated in section 6 of this Policy.
- **Retaliation:** Any action or omission prohibited by law, or that, directly or indirectly, causes or may cause unjustified harm or results in unfavorable treatment that places those who suffer from it at a particular disadvantage in comparison to others in the workplace or professional context, as a consequence of having filed a Complaint or provided Information, used external channels, or made a public disclosure.

- **Claims or Communications of a Contractual or Commercial nature:** Communications or grievances of (i) policyholders, insured parties, or beneficiaries of insurance policies taken out with MAPFRE; (ii) investors, participants, and beneficiaries of individual pension plans and mutual funds, managed, promoted, or deposited in MAPFRE; (iii) affected third parties due to claims arising from insurance contracts underwritten by MAPFRE, or (iv) customers of insurance agents and bancassurance operators who provide mediation services for the private insurance companies of the Group, as well as the rightful claimants of any of them, in relation to decisions made by MAPFRE in the context of the execution of the aforementioned contracts.

### 3. OBJECTIVE SCOPE

The Internal Information System of MAPFRE, S.A. is established, designed, and managed to promote the communication of Complaints or Information about conduct within the scope of that Company. Likewise, through the Internal Information System, queries, or doubts may be raised regarding the interpretation and/or application of the MAPFRE Code of Ethics and Conduct.

The Internal Information System is not designed as a Customer Service, and therefore, Claims or Communications of a Commercial or Contractual Nature will not be processed through it. These will be handled through the Claims and Grievances Procedure established for this purpose.

### 4. SUBJECTIVE SCOPE

The Internal Information System is authorized to receive Complaints made by Informants in accordance with the principles established in this Policy and in accordance with the Management Procedure approved by MAPFRE.

### 5. GUIDING PRINCIPLES OF THE INTERNAL INFORMATION SYSTEM

Notwithstanding the autonomy and independence of the Group's Companies and any adaptations necessary for compliance with the regulations applicable to each, the Internal Information System must comply at all times with the following Guiding Principles:

1. **Principle of zero tolerance.** The Internal Information System is a manifestation of the principle of zero tolerance to irregular actions and the rejection of any violation or violation of current legislation or MAPFRE values and ethical principles.
2. **Prohibition of retaliation.** All types of retaliation, whether direct or indirect, against the Informants or any person included in section 8 of this Policy are prohibited. The governing bodies of the Group Companies will adopt the necessary and reasonable support and protection measures against all forms and attempts at retaliation.
3. **Principles of independence, objectivity, diligence, and legality:** Complaints received will be managed, processed, and resolved with the utmost objectivity, impartiality, and independence, establishing principles and rules of action to prevent possible conflicts of interest from occurring and prevent any person who may be involved in a potential conflict of interest with the persons involved in the Complaint from taking part in its management.

The System Supervisory Body will manage the Complaints with due diligence and respect for the Guiding Principles contained in this Policy and in applicable legislation.

4. **Principle of confidentiality.** Confidentiality as an essential principle governing all actions taken within the framework of the Internal Information System.

The System is designed securely and has appropriate technical and organizational measures to guarantee the confidentiality of all Information and the identity of the Informant and any person included in the Complaint. The actions and investigations conducted in the management and processing of Complaints will also be confidential. Access to this Information will be restricted to the persons responsible for managing the Complaints or Information, preventing access by unauthorized personnel.

If a Complaint is received through a different medium or by a person other than the Supervisor, absolute confidentiality must be maintained regarding the received Information, which will be immediately forwarded to the Supervisory Body of the Internal Information System. MAPFRE will design and promote training and awareness initiatives to ensure employees understand their obligation to maintain confidentiality and to immediately forward any communication they may receive on this matter to the Supervisory Body. Failure to comply with this obligation may be considered a very serious violation.

However, in no case may confidentiality be construed as an impediment or obstacle that restricts or conditions the possible disclosure of the facts reported to the competent authorities in accordance with applicable legislation.

5. **Rights of Affected Persons.** The Internal Information System will respect the presumption of innocence and the honor and image of the Affected Persons and guarantee their right to an impartial investigation of the facts and their right of defense, including the right to be informed of the actions or omissions attributed to them, to be heard at the appropriate time and in the appropriate manner to guarantee the proper purpose of the investigation, and to have access to the case under the terms provided in the Management Procedures. Affected Persons will enjoy the same protection as that established for Informants, preserving their identity and guaranteeing the confidentiality of all the facts and data contained in the case file.
6. **Anonymity.** Any Informant who wishes to remain anonymous may do so insofar as the local regulations of the country in which the Complaint occurs will allow. In these cases, anonymous complaints will be processed respecting the guarantees established in this Policy and, in particular, without performing any kind of tracking or action aimed at obtaining the Informant's identification or data.
7. **Good faith.** The Guiding Principles of this Policy will apply to Complaints presented to the Internal Information System in good faith and honesty. The Informant must have reasonable grounds to believe that the facts reported are truthful at the time of making the Complaint.
8. **Advertising and accessibility.** This Policy is published on the MAPFRE corporate website and on the internal portal as well as on any other means deemed appropriate to guarantee its best and broadest knowledge. Access to the Internal Information System will be public and easy to use and understand for anyone wishing to file a complaint.

## 6. SYSTEM SUPERVISORY BODY

The Supervisory Body of the Internal Information System (the **"Supervisor"** or **"System Supervisory Body "**) is the Internal Information System Committee of MAPFRE, S.A. (the **"Committee"**), comprising the following persons appointed by the Company's Board of Directors:

- Manager of Legal Affairs for the Securities Market and Corporate Governance, the Manager of the Corporate General Counsel and Legal Affairs Area (who will be the Chair of the Committee),
- Group Head of Compliance Office (the Secretary of the Committee),
- HR Manager for the Corporate Areas, the Manager of the Corporate People and Organization Area,
- Controller of the MAPFRE Group, Controller of the Corporate Finance and Resources Area,
- Security Governance, Risk, and Compliance Manager of the Corporate Operation Transformation Area

The appointment and removal of the members of the Committee must be notified to the competent authorities under the terms established by law, where applicable.

In other Companies, the appointment of the System Supervisory Body will be made by their respective governing bodies, upon the proposal of the Group Head of Compliance Office. Its composition will be equivalent to that of the MAPFRE, S.A. Committee, considering the roles and professional competencies of its members, and always adapted to the organizational structure of the Company.

The Committee will have the necessary material and human resources for the proper performance of its functions, which it will carry out in full compliance with the Guiding Principles of the Internal Information System outlined in this Policy. Its actions will be characterized by neutrality, honesty, and objectivity toward all parties involved, and it will operate independently and autonomously, without receiving any instructions in the exercise of its functions.

It may also request collaboration from other areas or have external collaborators who will support it in the analysis and investigation of the Complaints according to the nature of the facts reported. In the case of Complaints concerning facts that could constitute harassment behavior or acts in any of its forms, filed within the scope and applicability of the Corporate Protocol for the Prevention and Treatment of Harassment, the handling of the file will be assigned to the Investigative Body referred to in the aforementioned Protocol. In turn, for Complaints concerning facts that could constitute internal fraud as defined in the Corporate Policy for Combating Fraud of the MAPFRE Group, the handling of the case will be assigned to the Corporate Security Division.

All employees and executives of MAPFRE will collaborate at the request of the Committee in clarifying the facts.

The Committee will be responsible for preparing and updating a record of the Complaints received, any investigations that may have given rise, the resolution adopted, and any other information established by applicable regulations. It will adopt as many measures as necessary to guarantee the confidentiality and protection of any data included in that record.

The System Supervisors designated by the Companies will report to the Group Head of Compliance Office with the frequency and through the procedure established for this purpose. This reporting will cover the Complaints received within their area of responsibility, including information on the

number, origin, type, investigation outcomes, and measures adopted, as well as any other information necessary for proper coordination and effective performance of their duties. The goal is to ensure comprehensive knowledge of the appropriate management of the Internal Information System at the corporate level, always within the limits established by the applicable regulations.

Likewise, if the Affected Person is a senior executive or a member of the governing body of Group Company, or if the Complaint or Information poses any significant reputational risk to the MAPFRE Group, the System Supervisory Body of the respective Company must inform the Group Head of Compliance Office about the content of the Complaint, its handling, and its appropriate resolution.

## 7. MANAGEMENT PROCEDURE

The Internal Information System will have an appropriate internal procedure for managing the Complaints received, which will allow the Informants to communicate their Information or file their Complaints and will include at least the following aspects:

- The channel or channels through which Complaints may be received, either in writing (via the appropriate form located on the website or through any other established means), verbally, or both, in accordance with the terms and conditions set forth in the applicable regulations. This process must respect and comply with the Guiding Principles established in this Policy. In cases where the applicable regulations so provide, the Information may also be communicated through an in-person meeting within a reasonable timeframe under the terms established in said regulations.
- The issuance of an acknowledgment of receipt of the Complaint to the Complainant, if identified, within a specified timeframe.
- A maximum response or resolution period for Complaints starting from the acknowledgment of receipt or, in its absence, from the expiration of the specified timeframe for issuing the acknowledgment of receipt to the Complainant following the receipt of the Complaint.
- Clear and easily accessible information about external channels of complaints to the competent authorities and, where appropriate, to the institutions or bodies established for this purpose in the applicable regulations.

The governing body of each Company will approve its respective Information Management Procedure (the “**Management Procedure**”) taking as reference the one approved by MAPFRE S.A., only making adaptations or modifications that, where appropriate, are strictly necessary for it to comply with local regulations, as well as the regulatory requirements or those of their respective supervisors that are applicable to each Company.

## 8. MEASURES TO SUPPORT AND PROTECT THE INFORMANT

MAPFRE will adopt the necessary and reasonable support and protection measures to protect Informants against all forms of retaliation or attempts at retaliation, under the terms provided for in the applicable regulations, without prejudice to the legal obligations and the protection of the

rights corresponding to natural or legal persons against whom a false claim or information is presented or when the Complainant has acted in bad faith.

Where applicable, the informant's protection measures will also apply to:

- The legal representatives of the workers in the exercise of their functions of advising and supporting the informant.
- Natural persons who assist the Informant within the framework of the organization in which it provides services.
- Natural persons related to the Informant who may suffer retaliation, such as coworkers or family members.
- The legal persons for which the Informant works, with which they maintain any other relationship in a work context, or in which they hold a significant stake.

The prohibition of Retaliation will not prevent the adoption of disciplinary measures deemed appropriate when the investigation of the facts communicated in the Complaint determines that the Information is false or has been made in bad faith by the Informant.

## 9. INTERNAL INFORMATION SYSTEM GOVERNANCE FRAMEWORK

In order to implement the principles contained in this Policy, the following Internal Information System Governance Framework is established:

- **The Board of Directors of MAPFRE, S.A.** The body responsible for establishing and implementing the Internal Information System in MAPFRE, S.A. To this end, it approves this Policy and ensures the application of its Guiding Principles in that Company.

It also approves the corresponding Company Management Procedure and is responsible for the appointment, dismissal, or removal of Committee members.

- **The Management Bodies of each Group Company.** These accept this Policy (with modifications or adaptations that, where appropriate, are strictly necessary, as indicated in section 3), approve their corresponding Management Procedures, and appoint, dismiss, or remove the members of the governing body constituted as the Supervisor Body of their respective Internal Information Systems.
- **The Committees or equivalent bodies of the Boards of Directors of the Group Entities to which, where applicable, the corresponding Board of Directors has entrusted functions related to the supervision of control and risk management systems, compliance supervision, and/or the supervision of the process of preparing financial and non-financial information and internal auditing.** They will be responsible for the general supervision of the operation of the Entity's Internal Information System for the purpose of evaluating the correct application of the aspects covered in this Policy, in accordance with the provisions of the corresponding Board of Directors' Regulations or equivalent rules of the relevant Entity.

For this purpose, it will receive annual information on the functioning of the Internal Information System of the corresponding Company (number of Complaints or Information received, their origin, type, and results of the investigations and measures adopted) and may propose improvement actions to minimize the risk of irregularities.

In any case and without prejudice to the foregoing, the Committees of the Boards of Directors of Group Entities with functions related to the supervision of the process of preparing financial and non-financial information and internal auditing will have direct access to Complaints or Information concerning irregularities of a financial, accounting nature, or related to sustainability aspects that could have a material impact on the financial statements or non-financial information statements or internal control of the relevant Company. For these purposes, it will receive individualized information from the Supervisory Body of the Internal Information System, which will provide any relevant information or documentation. The Audit Committee of MAPFRE, S.A. will also have direct access to Complaints or Information with a material impact on the financial statements or non-financial information statements or on the internal control of any of the Group's Companies or Group as a whole.

- **Supervisory Body of the Internal Information System.** It is responsible for managing the Internal Information System under the terms and scope established in this Policy and in the corresponding Management Procedure.

Its members are appointed by the governing body of each of the Group's companies under the terms set out in this Policy.

It will be responsible for informing the Board of Directors, either directly or through the corresponding committee, in the cases mentioned in the previous point. of the issues corresponding to the Internal Information System and may make proposals for improvement or establish action plans based on the results obtained and indicators obtained.

## 10. PERSONAL DATA PROTECTION

The management of the Internal Information System will comply with the regulations on personal data protection applicable to the various Group companies.

## 11. POLICY DEVELOPMENT

The Supervisory Body of the Internal Information System, within the scope of its responsibilities and without prejudice to the oversight powers of the Board of Directors of each Entity and, where applicable, its committees, may issue regulations to develop this Policy and the corresponding Management Procedure (Guides, Procedures, or Circulars) to ensure the proper functioning of the Internal Information System under its responsibility.

## 12. DISSEMINATION AND TRAINING

In order to achieve proper dissemination, this Policy will be published in a separate and easily identifiable section of the home page of the MAPFRE S.A. corporate website ([www.mapfre.com](http://www.mapfre.com)) in which information on the Internal Information System and its Management Procedure will be provided in a clear and accessible manner, as well as on the internal portal and/or any other means deemed appropriate to guarantee its best and broadest knowledge.

If any of the Group companies has its own website, a separate and easily identifiable section of its home page will include a translation of this Policy into the corresponding local language and clear and accessible information about its respective Management Procedures. In the event of any



modification or adaptation of this Policy under the terms allowed under Section 1, the Company will publish the Policy adapted directly in a separate and easily identifiable section of the home page of its own website. In Group companies that do not have their own website, information on their Internal Information System and Management Procedure will be provided through the internal portal and/or any other means deemed appropriate to guarantee their best and broadest knowledge.

The Corporate Compliance Directorate is responsible for coordinating periodic communication actions, training on the functioning of the Internal Information System, and raising awareness for the proper understanding, application, and effective compliance of this Policy. It will also be responsible for resolving any queries received regarding the use and operation of the Internal Information System.

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

This Policy was approved by the Board of Directors of MAPFRE S.A. on December 18, 2024, and last modified on March 14, 2025, the date from which it entered into force, revoking and replacing the previous one.

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