

## FRAMEWORK FOR A RESPONSIBLE INSTITUTIONAL ENGAGEMENT

Mapfre carries out its business activity ensuring full compliance with current applicable regulation in each and every country of its operational footprint. Our engagement with regulatory bodies, authorities and public administrations is guided by the principles of legality, trust, professionalism, good faith and transparency, while we always remain neutral from a political standpoint.

Mapfre is member of different think tanks, organizations, chambers of commerce and trade and industry associations, which help our company build industry skills and networking, monitor industry policies and trends, and shape a more comprehensive vision on sustainable development and corporate citizenship, global challenges, and and risks and opportunities in this complex and interconnected world. .

The following chart gathers the different corporate codes, policies, rules and bylaws that state Mapfre's commitments, in order to ensure a responsible institutional engagement:

### COMMITMENT

### CODE OR POLICY WHICH INCLUDES MAPFRE'S COMMITMENT

*To develop a responsible institutional relationship (responsible lobby)*

Mapfre does not conduct lobby or advocacy activities directly with regulatory bodies or policy makers. Our company relies its advocating activities on local and international trade and industry associations in which the Group participates as a Member, while getting a global and comprehensive vision of industry trends and regulatory framework and guidance on issues of interest to the insurance sector, its impact, its risks and its opportunities.

This engagement with regulators, authorities and policy makers is also guided by principles for ethical, transparent and socially committed action, promoting strict observance of our Group's Institutional, Business and Organizational Principles, our Code of Ethics and Conduct, our Anti-corruption Policy and our Corporate Sustainability Policy.

- **Mapfre's Group Institutional, Business and Organizational Principles**  
<https://www.mapfre.com/media/shareholders/2017/institutional-business-and-organizational-principles-of-the-mapfre-group-2017-09-08.pdf>
- **Code of Ethics and Conduct**  
<https://www.mapfre.com/media/sustainability/code-ethics-and-code-conduct.pdf>
- **Anti-corruption Policy**  
<https://www.mapfre.com/media/shareholders/2021/politica-anticorrupcion-mapfre-2020-en-CE.pdf>
- **Corporate Sustainability Policy**  
<https://www.mapfre.com/media/shareholders/2021/corporate-sustainability-policy-2021.pdf>

\*All the policies and internal codes of conducts referred to in this document have been approved by Mapfre's governing bodies.

This Framework for a Responsible Institutional Engagement has been approved by Mapfre's Sustainability Committee.

## COMMITMENT

***To remain neutral with respect to the different political options***

## CODE OR POLICY WHICH INCLUDES MAPFRE'S COMMITMENT

Mapfre's **Code of Ethics and Conduct** states that *"Mapfre conducts its business activities in the full observance of the current legislation, the regulatory bodies and all the authorities in the countries where it operates and takes a neutral stance with regard to the different political options."*

*Mapfre does not make any type of contribution to campaigns of a political nature nor does it fund or make donations to political parties or to their representatives or candidates. Any employees who, in the exercise of their rights, take part in political activities must always do so in a strictly personal capacity, and avoid their activities in that field being attributed or associated to Mapfre."*

This commitment is also stated in Mapfre's Anti-Corruption Policy.

- **Code of Ethics and Conduct (p. 12)**  
<https://www.mapfre.com/media/sustainability/code-ethics-and-code-conduct.pdf>
- **Anti-corruption Policy (p. 3)**  
<https://www.mapfre.com/media/shareholders/2021/politica-anticorrupcion-mapfre-2020-en-CE.pdf>

***To inscribe the company in the most relevant transparency registers***

Mapfre is registered since 2019 in the EU Transparency Register, with the aim of being transparent regarding its interaction with EU institutions, thus being able to participate in the public policies elaboration process and, ultimately, helping reinforce the confidence on EU institutions. Being part of this register implies abiding by the EU Transparency Register Code of Conduct.

- **Mapfre's inscription to the UE Transparency Register**  
<https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=970705336248-40&locale=en#en>
- **EU Transparency Register Code of Conduct:**  
[https://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do?reference=CODE\\_OF\\_CONDUCT\\_T&locale=en#en](https://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do?reference=CODE_OF_CONDUCT_T&locale=en#en)

## COMMITMENT

## CODE OR POLICY WHICH INCLUDES MAPFRE'S COMMITMENT

***To truthfully identify the company and its representatives when interacting with the EU institutions***

The EU Transparency Register Code of Conduct, in which Mapfre is registered, states, among other commitments, that Mapfre representatives, “*in their relations with any of the signatory institutions and other Union institutions, bodies, offices or agencies (together referred to as ‘Union institutions’), always identify themselves by name, by registration number and by the entity or entities they work for or represent;*”.

- **EU Transparency Register Code of Conduct**

- [https://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do?reference=CODE\\_OF\\_CONDUCT&locale=en#en](https://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do?reference=CODE_OF_CONDUCT&locale=en#en)

***To ensure that the information provided to authorities, regulatory bodies and other public administrations is truthful, complete and updated***

Mapfre’s **Code of Ethics and Conduct** states (section 6.10) that “***all the employees must make sure that the information they provide, both internally and externally, is precise, clear and truthful, and in no case must they knowingly provide incorrect, incomplete or inaccurate information or information that can induce misunderstanding in the recipient.*** All the information, whether financial or otherwise, that is notified to the shareholders, the markets in which Mapfre shares are listed, the regulatory authorities in these markets and the Public Administration must be truthful and comprehensive, notified in time and in compliance with all other requirements established in the applicable regulations and general operating principles of the markets and of good governance assumed by the Mapfre Group.”

In addition, the **EU Transparency Register Code of Conduct**, signed by Mapfre, includes the commitment of ensuring “*that the information that they provide upon registration, and subsequently administer in the framework of their covered activities, is complete, up-to-date, accurate and not misleading, and agree to that information being made available in the public domain*”.

- **Code of Ethics and Conduct (p. 15)**

- <https://www.mapfre.com/media/sustainability/code-ethics-and-code-conduct.pdf>

- **EU Transparency Register Code of Conduct**

- [https://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do?reference=CODE\\_OF\\_CONDUCT&locale=en#en](https://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do?reference=CODE_OF_CONDUCT&locale=en#en)

## COMMITMENT

## CODE OR POLICY WHICH INCLUDES MAPFRE'S COMMITMENT

*To be transparent in the declaration of the company's business interests*

In its inscription to the EU Transparency Register, Mapfre includes a list of its areas of interest regarding the regulatory agenda and public policy

- **Mapfre's inscription to the EU Transparency Register**  
<https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=970705336248-40&locale=en#en>

*To avoid obtaining or trying to obtain information or decisions dishonestly or by use of undue pressure*

Mapfre's **Code of Ethics and Conduct** states that *"Mapfre is against all unethical practices aimed at inappropriately influencing the action and will of other people in order to gain advantages or benefits"*.

The company's Anti-Corruption Policy sets the basic rules and the framework to prevent and detect corrupt practices in any of the group's operations. This policy states that *"Employees may not solicit or accept, or otherwise promise, offer or bestow, directly or indirectly, gifts, payments, invitations, commissions, compensation, favors or advantages of any type to obtain remuneration or to attempt to inappropriately influence their commercial or professional relations with public or private companies, public officials, employees, managers and administrators of public companies or bodies, organizations and political parties, politicians or candidates for public office"*.

In addition, through its incorporation to the **EU Transparency Register Code of Conduct**, Mapfre makes the commitment to not to obtain or try to obtain *"information or decisions dishonestly or by use of undue pressure, improper behavior or offensive language"*, as well as avoiding inducing *"members of the European Parliament, members of the Commission or staff of the Union institutions to contravene the rules and standards of behavior applicable to them"*.

- **Code of Ethics and Conduct (p. 14)**  
<https://www.mapfre.com/media/sustainability/code-ethics-and-code-conduct.pdf>
- **Anti-Corruption Policy (p. 3):**  
<https://www.mapfre.com/media/shareholders/2021/politica-anticorrupcion-mapfre-2020-en-CE.pdf>
- **EU Transparency Register Code of Conduct**  
[https://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do?locale=en&reference=CODE\\_O\\_F\\_CONDUCT](https://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do?locale=en&reference=CODE_O_F_CONDUCT)

**COMMITMENT****CODE OR POLICY WHICH INCLUDES MAPFRE'S COMMITMENT**

*To respect the commitment of confidentiality of those Mapfre employees who previously held public sector positions*

By subscribing the EU transparency Register Code of Conduct, Mapfre commits, in case the company hires former European Parliament MPs, members of the Commission or personnel of the EU institutions, to “take the confidentiality requirements and rules applicable to those individuals after leaving the respective institution duly into account, with a view to preventing conflicts of interest”.

- **Mapfre’s inscription to the EU Transparency Register**  
<https://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=970705336248-40&locale=en#en>
- **EU Transparency Register Code of Conduct**  
[https://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do?locale=en&reference=CODE\\_OF\\_CONDUCT](https://ec.europa.eu/transparencyregister/public/staticPage/displayStaticPage.do?locale=en&reference=CODE_OF_CONDUCT)

*To have approval procedures for gifts, travel or other privilege by an independent department*

Mapfre’s **Code of Ethics and Conduct** states that “Employees may not solicit or accept, or otherwise promise, offer or bestow, directly or indirectly, gifts, payments, invitations, commissions, compensation, favors or advantages of any type to obtain remuneration or to attempt to inappropriately influence their commercial or professional relations with public or private companies, public officials, employees, managers and administrators of public companies or bodies, organizations and political parties, politicians or candidates for public office”.

This commitment is also included in the Groups **Anti-Corruption Policy**:

- **Code of Ethics and Conduct (p. 15)**  
<https://www.mapfre.com/media/sustainability/code-ethics-and-code-conduct.pdf>
- **Anti-Corruption Policy (p. 3):**  
<https://www.mapfre.com/media/shareholders/2021/politica-anticorruccion-mapfre-2020-en-CE.pdf>

## COMMITMENT

*To be transparent regarding the company's membership to lobbying institutions, trade associations, tax-exempt entities, or other groups whose role is to influence political campaigns or public policy and legislation*

*To give both internal and external publicity to the codes and policies that regulate the company's responsible institutional relationship*

## CODE OR POLICY WHICH INCLUDES MAPFRE'S COMMITMENT

Mapfre publishes in its **Integrated Report**, on a yearly basis, the list of foundations, trade and industry associations, chambers of Commerce and think tanks in which the company is member, as well as the amount paid through membership fees to these institutions and the main topics of influence discussed in these entities with authorities and regulatory bodies. This information is also published in **Mapfre's corporate website**.

- **2021 Integrated Report (p. 125):** <https://www.mapfre.com/media/shareholders/2022/06-integrated-report-2021.pdf>
- **Corporate website:** <https://www.mapfre.com/en/our-stakeholders/>

Mapfre commits, in its **Anti-Corruption Policy** to “*appropriately disseminate this policy so that it is known internally and externally by the different stakeholders*”.

The group's **Code of Ethics and Conduct** states that “*all the employees and agents of the companies in the Mapfre Group who are subject to the regulation on the prevention of money laundering and financing terrorism have received specific training in this field (with differing degrees of depth according to the level of risk in the sphere of activities they carry out), with details of the way of proceeding in the case any suspicious operation is detected*”.

- **Anti-Corruption Policy (p. 3):** <https://www.mapfre.com/media/shareholders/2021/politica-anticorrupcion-mapfre-2020-en-CE.pdf>
- **Code of Ethics and Conduct (p. 15)** <https://www.mapfre.com/media/sustainability/code-ethics-and-code-conduct.pdf>

## COMMITMENT

*To have a dedicated confidential hotline or email address where queries regarding the non-compliance with the Code of Ethics and Conduct and other internal rules*

## CODE OR POLICY WHICH INCLUDES MAPFRE'S COMMITMENT

Mapfre has a dedicated inquiries channel in order to incorporate complaints related to the principles and performance standards to which its **Anti-Corruption Policy** refers. This policy states that, que *“Mapfre uses the ethical complaints and inquiries channel. Employees, as well as those who hold senior management positions or who belong to the Management bodies of Mapfre companies, are required to inform the company, either through their senior manager or by reporting to the Ethics Committee, of any cases of corruption they are aware of or have reasonable evidence of. Mapfre undertakes to adequately manage and take appropriate measures with respect to any event of corruption that may occur within it, bringing it to the attention of the competent authorities and taking appropriate legal action, where appropriate.”.*

- **Anti-Corruption Policy (p. 3):**  
<https://www.mapfre.com/media/shareholders/2021/politica-anticorrupcion-mapfre-2020-en-CE.pdf>