



**CORPORATE PROTOCOL FOR PREVENTING AND ADDRESSING  
HARASSMENT**

## CORPORATE PROTOCOL FOR PREVENTING AND ADDRESSING HARASSMENT

### 1 Introduction

The Board of Directors of MAPFRE S.A. (the “**Company**”) is the competent body for defining the general strategy and establishing the bases for appropriate and efficient coordination between the Company and the other companies within the group of companies of which MAPFRE S.A. exercises control within the meaning of Article 42 of the Spanish Commercial Code (the “**Group**” or the “**MAPFRE Group**”).

In exercising these responsibilities, the Board of Directors approves and updates the corporate policies that govern the Company’s activities; that establish the guidelines and fundamental principles that inspire and orient the mandatory rules that the Group’s other companies approve within the scope of their own decision-making capacity and responsibility; and that form the basis for mandatory compliance with those rules.

In this regard, the Company’s Board of Directors has approved this *Corporate Protocol for the Prevention and Handling of Harassment* (the “**Protocol**”), which forms part of the Company’s corporate governance system, originates in the *MAPFRE Group’s Institutional and Business Principles*, and is grounded in and aligned with the Company’s Purpose, Vision, and Values as defined by its governing body.

### 2 Classification

In accordance with the classification set out in the *Corporate Policy on the drafting and organization of the rules that make up the MAPFRE Group’s corporate governance system*, this standard is a general, corporate-wide procedure that develops the provisions of the *Corporate Policy on the Internal Reporting System* for all reports concerning facts that could constitute conduct or acts of harassment, in any of its forms, with the aim of preventing, avoiding, or eliminating any type of harassment in the workplace.

### 3 Purpose

This *Protocol* establishes the guidelines for putting in place a global framework that ensures safe and healthy working environments, respectful of fundamental rights, freedom, and human dignity, and free from any form of harassment, through the prevention, detection, and effective handling of such conduct. In particular, this *Protocol* seeks to:

- a) Prevent the occurrence of harassment behaviors in all their forms within the workplace.

- b) Detect and channel reports related to facts that could constitute harassment, ensuring their proper handling.
- c) Provide a consistent procedure for the management of harassment cases.
- d) Guarantee the protection of all individuals involved, ensuring a respectful and safe working environment.

For these purposes, the *Protocol* includes:

- a) Definitions and key components of each type of harassment with the aim of identifying behaviors that could give rise to them.
- b) Prevention measures.
- c) Guiding principles for the response procedure in case of complaints concerning acts that may constitute harassment.
- d) The adaptation of the procedure in each country, only as necessary, to ensure compliance with applicable local regulations.

#### **4 Scope of application**

The *Protocol* applies to all companies that make up the MAPFRE Group. It is also applicable, as appropriate and in accordance with the relevant shareholder agreements, to the various partnerships and joint ventures in which companies of the Group participate.

The *Protocol* shall apply to the following persons, regardless of the company, country and location in which they provide services:

- a) All personnel at any of the MAPFRE Group companies, regardless of the type of labor-related relationship they have.
- b) People doing internships under any contract modality in force at any time, or with a work scholarship, as well as collaborators employed by subcontracting companies or temporary employment agencies.
- c) Members of the administrative body and bodies derived from it or to which it delegates, and members of the management or supervision bodies of MAPFRE Group companies, including non-executive members.
- d) All people whose employment relationship with any of the MAPFRE Group companies has already ended, regardless of the circumstances.
- e) All people whose employment relationship with any of the MAPFRE Group companies has not started yet, and who are participating in or have participated in a selection process (candidates).

The procedure outlined in this *Protocol* will not be initiated if the Reported Person is not part of any of the groups specified in the previous sections. However, in such cases, the Internal Reporting System Supervisor of the company where the *Allegedly Harassed Person* works will take appropriate actions in accordance with its Information Management Procedure to ensure a harassment-free work environment.

The scope of this *Protocol* is global, and it shall apply to situations of harassment occurring not only during working hours and in the workplace, but also outside the workplace and working hours in relation to the work or as a result thereof, which may take place, among others, in the following areas:

- a) in the workplace, including public and private spaces used as a workplace;
- b) in break areas, dining rooms, or in sanitary or restroom facilities;
- c) during journeys, trips, events or social or training activities related to work;
- d) in the framework of work-related communications, including those sent using computer and communication technologies; and
- e) on the commute between home and the workplace.

## **5 Definitions**

For the purposes of this *Protocol*, the following terms are defined:

- a) **“Reported Person”**: the individual accused of alleged harassment, referred to as the “Affected Person” in the *Corporate Internal Reporting System Policy*.
- b) **“Filer”**: the individual who files the harassment complaint, referred to as the “Whistleblower” in the *Corporate Internal Reporting System Policy*.
- c) **“Allegedly Harassed Person”**: the individual who is believed to be the target of behavior that could be classified as harassment under this *Protocol*.
- d) **“Victim of Harassment”**: the individual who, after the *Protocol* has been processed, is officially recognized as having been subjected to harassment, as confirmed by the Internal Reporting System Supervisor based on the findings of the investigating body. The Allegedly Harassed Person will then be referred to as the Victim of Harassment.

## **6 Statement of Principles**

Based on the conviction that the MAPFRE Group's culture and values must protect the dignity, privacy, health, physical integrity and non-discrimination of the people who make up its organization, this *Protocol* establishes the guidelines to

prevent and, where applicable, correct any behavior that may constitute harassment.

Through a series of principles and measures, the *Protocol* is intended, firstly, to help maintain harassment-free labor environments. Secondly, it aims to guarantee that, should such situations arise, the appropriate procedures and channels are available to report, investigate and correct such behaviors by taking the necessary measures in each case.

To this end, the Protocol shall be implemented in every country in which MAPFRE Group companies operate under the following corporate principles:

- a) Compliance with the applicable internal and external regulations in each country regarding harassment and protection against harassment will be ensured.
- b) The entire MAPFRE Group workforce must help to ensure a labor environment in which people's dignity is respected.
- c) The MAPFRE Group firmly opposes all forms of harassment in the workplace and explicitly considers any type of harassment intolerable, regardless of the identities of the victim or the harasser in the reported situation.
- d) Workplace harassment is absolutely unacceptable and inappropriate, so the MAPFRE Group as a whole shall act against it, as it does with any other form of inappropriate behavior.
- e) All personnel, as well as other people who fall within the scope of application of the *Protocol*, are entitled to make use of the procedure established therein with all its guarantees, and they must not be subjected to intimidation or to unfair, discriminatory or unfavorable treatment as a result of its use. Such protection shall be extended to anyone involved in the handling of procedures derived from the application of the *Protocol*.
- f) MAPFRE Group companies undertake to investigate all complaints of alleged conduct constituting harassment that are handled under this *Protocol* with the utmost respect for privacy and absolute confidentiality. Likewise, objectivity and neutrality are guaranteed by the measures established therein.

Behaviors constituting harassment shall be considered very serious offenses, prompting the MAPFRE Group to take the appropriate measures in accordance with the local laws of each country.

## **7 Types of harassment**

By way of example, the types of harassment that may be considered as such within the framework of the *Protocol* are listed as follows.

Depending on who is carrying out the harassment, it can be of various types:

- a) **Top-down harassment**: when the harasser holds a higher hierarchical position than the victim.
- b) **Horizontal harassment**: occurs between individuals of the same hierarchical level.
- c) **Bottom-up harassment**: when the harasser holds a lower hierarchical position than the victim.
- d) **Psychological harassment**: understood as any conduct, practice or behavior that systematically and recurrently constitutes, in the context of the employment relationship, the undermining or infringement of a person's dignity, aimed at subjugating them emotionally and psychologically and seeking to sabotage their success, promotion opportunities or continuity in the job, creating a hostile, intimidating or degrading atmosphere and negatively impacting the labor environment.

The key components of workplace bullying behaviors may be summarized as follows:

- There is an intention to harm or a harmful effect: there is a real intention to harm an individual's professional and personal dignity or a harmful effect.
  - Persistence over time.
  - Violation of a person's fundamental rights.
- e) **Harassment based on sexual orientation**: In countries where this type of harassment is considered, any behavior carried out on the grounds of a person's sexual orientation, with the purpose or effect of infringing their dignity or creating an intimidating, hostile, degrading, humiliating and offensive environment, shall be considered as such.
  - f) **Discriminatory harassment**: any behavior constituting any of the illegal grounds of discrimination with the aim of infringing a person's dignity or creating an intimidating, hostile, degrading, humiliating, offensive or segregating environment.
  - g) **Sexual harassment**: without prejudice to the legal definition that may exist in each country, sexual harassment shall be understood as any verbal, non-verbal, physical or unwanted behavior of a sexual nature that has the purpose or produces the effect of infringing a person's dignity.
  - h) **Gender-based harassment**: understood to be any behavior carried out according to a person's gender for the purpose or with the effects of

infringing their dignity or creating an intimidatory, hostile, demeaning, humiliating and offensive environment.

## **8 Prevention Measures**

To avoid and prevent any infringement of the dignity, privacy and other fundamental rights of people in the labor environments of the MAPFRE Group, any behaviors that could be considered to fall within the aforementioned definitions are strictly prohibited.

In this regard, in each country where it operates, the MAPFRE Group shall promote measures to prevent and avoid situations of harassment, based on the principle that all individuals have the right to privacy, dignity and non-discrimination in labor relations.

Specifically, the MAPFRE Group undertakes to implement the following prevention measures in all countries where it operates:

- a) Distribute the *Protocol* to all people to whom it applies, guaranteeing its accessibility.
- b) Inform and train its entire workforce on the content of the *Protocol* and raise awareness of the values of respect for dignity on which it is founded.
- c) Integrate actions for workplace harassment prevention and resolution into human resource management.
- d) Inform the Management and other team leaders of the need to apply these principles and take the necessary actions to guarantee their enforcement, also ensuring that the people under their supervision are not victims of workplace harassment.
- e) Inform the entire workforce of the obligation to ensure a suitable working atmosphere free of behaviors that could constitute harassment; as well as the obligation to observe the provisions of the *Protocol* and to use the procedure established therein responsibly.
- f) Promote an environment of respect in the workplace, instilling the values of equal treatment, respect, dignity and free expression of personality in the entire workforce.
- g) Prohibit insinuations or expressions contrary to the outlined principles in language, communications and attitudes.

## **9 Guiding Principles of the Harassment Response Procedure**

The internal response procedure established in the *Protocol* (hereinafter the "**Procedure**") is intended to investigate and clarify the reported or known facts that may correspond to behaviors or acts constituting harassment, as well as,

where appropriate, to propose measures to resolve the potential situation. The guiding principles of the Procedure are outlined below, which, together with the guiding principles of the company's Internal Reporting System, establish a common framework of guarantees:

- a) Complaints filed in good faith: anyone who reports behaviors that could constitute harassment must act in good faith and refrain from deliberately making false accusations.

A complaint filed in good faith is made without malice or the intention of obtaining any personal gain or harming the Reported Person, provided that the Filer has reasonable grounds to believe that a situation constituting harassment may be taking place.

Any employee who knowingly or negligently submits a blatantly false or bad-faith complaint may be subject to disciplinary measures as outlined in the Internal Reporting System Management Procedure of the relevant company.

In contrast, any worker who files a complaint in good faith shall not be subject to any disciplinary action, even if it is later demonstrated that the complaint filed was inaccurate or unfounded.

- b) Respect and protection of people: actions or proceedings shall be carried out with due respect for the people involved, who may in no way receive unfavorable treatment for their participation in the Procedure.
- c) Confidentiality: all parties to the investigation Procedure are required to maintain strict confidentiality and secrecy, without disclosing or sharing information about the investigation carried out.
- d) Diligence: the reported behavior must be investigated and resolved without delay, so that the Procedure may be completed as quickly as possible.
- e) Exhaustive research: a rigorous investigation of the reported events is guaranteed.
- f) Collaboration: all parties summoned in the course of the Procedure have the duty to be involved in it and to cooperate with it.
- g) Contradiction: an impartial hearing and fair treatment must be guaranteed to all parties involved. All parties must seek, in good faith, the truth and the clarification of the allegations.
- h) Proof of accreditation: no action shall be taken against any person who is accused of committing harassment, in any of its forms, until the facts are effectively accredited.



- i) Health protection: the investigating body, either on its own initiative or at the request of the Allegedly Harassed Person, may take any necessary measures to ensure the protection of the Allegedly Harassed Person's right to health. Any measures adopted must be recorded in the case file under investigation.
- j) Prohibition of retaliation: retaliation against the Filers, as well as those appearing as witnesses or who help, participate in or are required to investigate a case of harassment, are expressly prohibited.
- k) Adoption of measures: the MAPFRE Group may adopt disciplinary or any other measures deemed appropriate against the Reported Person if the facts are accredited, and against anyone who files false complaints or complaints in bad faith.

## **10 Response Procedure**

The following outlines the internal procedure at the MAPFRE Group for handling situations where a complaint is filed or when facts are known that may be considered behaviors constituting harassment.

The Procedure shall have the purpose of investigating or clarifying the allegations, as well as, when applicable, proposing measures to resolve the potential situation.

In cases where the MAPFRE Group has indications that any of the behaviors mentioned may have occurred, it is also required to initiate the Procedure by filing the appropriate complaint through the Internal Reporting System of the relevant company.

### **10.1 Complaint Process**

#### **10.1.1 Complaint channel**

Any individual who believes they are being harassed or subject to behavior that could be considered harassment (the Allegedly Harassed Person) may file a complaint through the Internal Reporting System of the relevant entity, using any of the channels provided in that company's Information Management Procedure.

Additionally, potential harassment situations can be reported to any member of the legal workers' representation or to the Human Resources Department of the Allegedly Harassed Person's company. These representatives will then forward the complaint to the person responsible for the Internal Reporting System, in accordance with the *Corporate Internal Information System Policy* and Information Management Procedures of each company.

If the complaint is not filed directly by the Allegedly Harassed Person, the entity's Compliance Department or Supervisor must inform them of this.

Complaints must be made in writing using any of the channels outlined in the Information Management Procedure of the respective company. However, verbal complaints will be accepted, provided that the person receiving the complaint records it in writing and it is signed by the Filer.

Anyone who becomes aware of conduct that could potentially be classified as harassment must report it immediately through the Internal Information System and via any of the methods outlined in the Information Management Procedure of the relevant company.

If the MAPFRE Group becomes aware of a potentially harassment-related situation without a formal complaint being filed, it is required to report the incident through the Internal Information System, in accordance with the Information Management Procedure of the appropriate company.

In cases where the Allegedly Harassed Person and the Reported Person are affiliated with different companies within the MAPFRE Group, and there are different Internal Information System Supervisors involved, the procedure will be primarily managed by the Supervisor of the company associated with the Allegedly Harassed Person. This will be determined through a written agreement between the two Supervisors, which will be communicated to both the Allegedly Harassed Person and the Reported Person.

#### **10.1.2 Complaint requirements**

The complaint must contain the following information:

- a) Identification of the Filer and their contact information.
- b) Identification of the Reported Person and position held.
- c) Identification of the Allegedly Harassed Person (if different from the Filer) and their position.
- d) A chronological and detailed description of the facts (since when have the facts been known, people involved, origin of the conflict, events that occurred, specifying places and dates, etc.).
- e) Identification of any possible witnesses.
- f) Copy of the documentation proving the facts or other information deemed pertinent.
- g) Request for the presence and participation of the workers' legal representatives, as appropriate.
- h) Filer's signature as proof of their agreement with everything included in the complaint.

Anonymous complaints will also be allowed.

## **10.2 Investigating Body**

The investigating body will be appointed by the Internal Information System Supervisor of the corresponding company, in accordance with the provisions of the *Corporate Internal Information System Policy* and the Information Management Procedure of that company.

The investigating body shall consist of at least two people, and in countries where the investigating body is required to be made up of more than two people, it shall be composed of the number of people established by local legislation. The members of the investigating body may be the MAPFRE Group employees or external professionals who have, in any case, the proper training in this matter. The persons who make up the investigating body at any time, whether internal or external, must meet the conditions of eligibility, objectivity and impartiality required by the procedure.

The investigating body shall take the necessary actions to investigate and clarify the allegations and to prevent the alleged harassment that has been reported from continuing, for which the appropriate measures will be taken.

The investigating body may seek the collaboration or assistance of external professionals during the procedure when it deems it appropriate.

No one involved in the investigation of the Procedure may have a familial, friendly, or openly hostile relationship, nor an immediate hierarchical superiority or subordination over the Allegedly Harassed Person or the Reported Person.

## **10.3 Precautionary measures**

At any time, for the duration of the procedure, the investigating body may adopt the precautionary measures it deems appropriate based on the severity of the reported behavior and the apparent veracity of the evidence provided.

Such measures shall have the purpose of facilitating the investigation and normalizing or preventing harm to the labor environment, as far as possible, for the duration of the investigation.

In addition, any precautionary measures that may be adopted, where applicable, must be reasonable and proportionate to their intended objective, that is, to prevent further events from occurring during the investigation that may aggravate the situation, generating greater harm to the Allegedly Harassed Person.

Depending on the severity of the reported conduct and the apparent credibility of the evidence provided, the investigating body may impose precautionary measures, including but not limited to: temporary physical separation of the Allegedly Harassed Person and the Reported Person, or granting paid leave to one or more of the individuals involved.

## **10.4 Steps in the Procedure**

### **10.4.1 Preliminary actions**

The investigating body shall make initial contact with the Filer within a maximum of five business days of receipt of the complaint.

Through said initial contact, the investigating body and the Filer shall carry out a joint analysis of the reported facts, after which the Filer shall confirm or refute the complaint.

If the Filer is not the Allegedly Harassed Person, the investigating body will meet with the Allegedly Harassed Person to review and verify the facts reported by the Filer.

Once the complaint is confirmed, the investigating body will:

- a) Inform the Allegedly Harassed Person that they will have access to any information necessary for the investigation.
- b) Shall inform the Allegedly Affected Person that the information to which the investigating body has access in the course of the Procedure and the minutes drawn up shall be treated confidentially and shall remain confidential, without prejudice to the fact that they may be used by the company in a judicial or administrative proceeding.
- c) Decide, at this initial stage, whether precautionary measures should be implemented if deemed necessary.
- d) Offer the Allegedly Harassed Person the option to attempt resolving the issue through mediation, provided the facts permit such an approach. Otherwise, the formal investigation procedure will be opened.

### **10.4.2 Mediation procedure**

The mediation procedure aims to resolve the dispute in an agile, simple, discreet and confidential manner, provided that the investigating body, after an appropriate assessment of the complaint received, considers that the dispute may be adequately resolved through this means.

Mediation will focus on separate meetings with the Reported Person and the Allegedly Harassed Person to facilitate resolution through advice and practical proposals for both parties.

The investigating body will assess whether a joint meeting is appropriate and, if so, propose it to both the Reported Person and the Allegedly Harassed Person for their consideration. If both parties agree, the meeting will be held.

The investigating body shall draw up a short statement with the conclusions reached during the mediation, indicating whether or not it has been possible to reach an agreement to put an end to the dispute.

- a) If an agreement is reached: the investigating body will notify the Internal Information System Supervisor of the company, which will take the necessary steps in accordance with its Information Management Procedure to prevent similar incidents in the future.
- b) If no agreement is reached: the mediation process will be concluded, and the formal investigation will proceed, with the Internal Information System Supervisor of the company being informed accordingly.

The preliminary proceedings and mediation procedure shall last a maximum of 10 business days. However, the investigating body may decide to extend this period based on the complexity or progression of the matter.

#### **10.4.3 Investigation procedure**

The Investigation Procedure will be initiated if the investigating body determines that mediation is not appropriate, or if mediation has been attempted but no agreement was reached to resolve the situation that led to the complaint.

the investigation procedure shall have a duration of 10 business days from the date when the investigating body decides to initiate it.

However, the investigating body may decide to extend the aforementioned period in view of the particular complexity of the investigation process and the volume of evidence to be examined or analyzed. In such cases, it must inform both the Allegedly Harassed Person and the Reported Person of said extension.

##### **a) Investigation**

The investigating body shall establish the work plan under the following guidelines:

- ✓ It shall re-assess the need to adopt precautionary measures.
- ✓ It shall determine the evidence to be examined, establish the procedure for obtaining it, and examine the determined evidence, duly storing it.
- ✓ It shall collect such information as it deems necessary about the environment of the parties involved.
- ✓ Identify individuals to be interviewed, primarily based on suggestions from the Allegedly Harassed Person and the Reported Person.
- ✓ Within the framework of the aforementioned interviews to clarify and investigate the allegations, the investigating body:

- Shall inform the interviewees about the possibility of accessing any information that may be required to complete the investigation procedure.
  - Shall inform the interviewees that the information to which they have access in the course of the investigation and the minutes that are drawn up shall be treated as sensitive and confidential.
  - Shall advise the interviewees that all statements made in the interviews, both by them and by the people leading the procedure, are confidential, and they shall therefore be instructed not to reveal the content of the interviews to anyone.
  - At the request of the Allegedly Harassed Person or the Reported Person, the Investigating Body shall offer the interviewees the option of having a legal representative of the workers present during the interview. In this case, the investigating body shall remind the legal representative of the need for extreme secrecy given the confidentiality of the investigation.
- ✓ It shall draw up minutes of all the meetings and interviews that are held, guaranteeing the utmost confidentiality and secrecy of its content. These minutes, signed by the participants, shall remain in the possession of the investigating body.

The investigating body will inform the directly involved parties (the Allegedly Harassed Person and the Reported Person) about the procedure to be followed.

#### **10.4.4 Resolution**

Upon completion of the formal Investigation Procedure, the investigating body will, within five working days, prepare a final report of conclusions (hereinafter referred to as the **Conclusion Report**) and submit it to the company's Internal Information System Committee for the adoption of the appropriate Resolution, in accordance with its Information Management Procedure.

**If, based on the Conclusion Report, the Internal Information System Supervisor determines that harassment has occurred,** it will forward the Resolution to the Human Resources Department of the company where the Reported Person is employed, to implement any necessary disciplinary, corrective, and/or preventive measures in compliance with applicable labor laws.

**If the Internal Information System Supervisor, based on the Conclusion Report, concludes that harassment did not occur or that it was not possible to verify the reported facts,** it will close the case, archive the complaint, and notify the Human Resources Department of the companies where both the Allegedly Harassed Person and the Reported Person work.

**If the Internal Information System Supervisor, based on the Conclusion Report, finds no harassment but identifies a personal conflict within the workplace,** it will forward the Resolution to the Human Resources Department

of the companies where both the Allegedly Harassed Person and the Reported Person are employed, so they can take any necessary action.

**If the Internal Information System Supervisor determines that the complaint was intentionally false or made with the intent to harm the Reported Person,** it will send the Resolution to the Human Resources Department of the company where the Filer works for appropriate action.

The Resolution issued by the Internal Information System Supervisor will, in all cases, be forwarded to the Corporate Labor Relations Department, with the personal data anonymized, to fulfill the reporting obligations under current regulations.

When the legal representation of personnel has been involved in the investigation procedure at the request of any of the parties involved, the Resolution will also be sent to them by the Internal Information System Supervisor.

#### **10.4.5 Measures to be adopted after an investigation procedure in which harassment has been confirmed.**

Once the Investigation Procedure is complete and the Internal Information System Supervisor has confirmed harassment, the corresponding Resolution will be sent to the Human Resources Department to implement the appropriate measures concerning the Reported Person, as well as any measures considered necessary to support the recovery of the Victim of Harassment. These may include:

- a) Psychological, medical, and social support for the Victim of Harassment.
- b) Modification of working conditions, with the Victim of Harassment's consent, if deemed beneficial to their recovery.
- c) Training or professional development for the Victim of Harassment if they have been on prolonged temporary disability leave.
- d) Any other measure that is considered advisable.

#### **10.4.6 Other considerations**

The regulations and procedures outlined in this Protocol do not prevent the initiation or processing of any other actions to pursue administrative, social, civil, or criminal liabilities, as applicable, arising from the harassment situation, in accordance with the Corporate Internal Information System Policy.

#### **10.4.7 Communications**

The Health and Safety Committee or the equivalent body in the country will be informed of cases of harassment that take place when required under local regulations.

## **11 Supervision, dissemination and monitoring of this *Protocol***

The Corporate People and Organization Area is the Sponsor of this *Protocol*, as defined in the *Policy on the Development and Organization of the Rules that Comprise the MAPFRE Group's Corporate Governance System*.

Notwithstanding the foregoing, the governing and management bodies of the Group companies—at the corporate, regional, and local levels—are responsible for disseminating and ensuring compliance with this *Protocol* within their respective companies. To this end, they must take the necessary measures to do so, and, where applicable, report any areas of non-compliance or partial compliance through the established channels.

As part of the Company's commitment to its stakeholders, this *Protocol* shall be published on the corporate website.

## **12 Approval and entry into force of this *Protocol***

This *Protocol* was initially approved by the Company's Steering Committee on January 24, 2008, and last amended on December 22, 2025, by the Board of Directors, repealing and replacing the previous version.