



**EXTRACT FROM MAPFRE S.A. CRIMINAL PREVENTION MODEL**

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### 1 Introduction

The Board of Directors of MAPFRE S.A. (the “**Company**”) is the competent body to define the general strategy and establish the basis for adequate and efficient coordination between the Company and the other companies integrated into the group of companies of which MAPFRE S.A. is the dominant entity in the sense established in article 42 of the Commercial Code (the “**Group**” or the “**MAPFRE Group**”).

In exercising its powers, it approves and updates the corporate policies that govern the actions of the Company and establishes the guidelines and basic principles that inspire and support the mandatory rules that the other companies of the Group adopt within the scope of their own decision-making capacity and responsibility.

Furthermore, in accordance with the *Regulations of the Board of Directors of MAPFRE S.A.* and with the *Compliance Policy*, this body is competent to approve the criminal prevention model, as proposed by the Risk, Sustainability and Compliance Commission.

Consequently, the Board of Directors of the Company has approved the *MAPFRE S.A. Criminal Prevention Model* (the “**Model**”) or the “**Prevention Model**”), which is a compliance program that aims to describe the foundations of an organizational and management model that includes the principles that underpin the actions of the Company with the objective of preventing potential criminal liabilities.

The *Model* is the basis of the criminal risk prevention system adopted by the Company and details the design and structure of the system implemented to prevent the commission of crimes within it.

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

This document describes the Company's guidelines for exercising due diligence and monitoring over its business activities, indicating the criminal risks to which it is exposed, and establishing guidelines for managing and evaluating the controls implemented to mitigate crimes within its scope.

## 2 Qualification

In accordance with the classification set out in the *Corporate Policy on the development and organization of the rules that constitute the corporate governance system of the MAPFRE Group*, this document is a general corporate procedure that develops the provisions of the *Compliance Policy* approved by the Board of Directors of the Company.

## 3 Purpose

The *Prevention Model* aims to:

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

## 4 Scope

This *Prevention Model* applies to the Company's legal representatives, its executives, its top management, as well as its employees and other persons who are subject to the authority or instructions of the aforementioned persons or who operate within their scope of management, supervision, oversight, or control. This includes those groups who act in the name of, on behalf of, or in any way in the interest of the Company.

Furthermore, it constitutes the general framework of reference for all entities of the MAPFRE Group.

As established in the *Policy for defining the organizational foundations and principles of MAPFRE*, the Group has a decentralized corporate structure, upon which a principled governance model is based, clearly defining the Company's functions in relation to the other Group entities. Furthermore, the Group has a business structure subject to a rigorous system of control and supervision at all levels -local, regional, and global- allowing for broad delegation in the execution and development of the responsibilities assigned to teams and their managers.

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

Within the context of this decentralized structure -and in firm application and development of the zero-tolerance principle towards potential criminal offenses, and in order to foster an ethical and responsible corporate culture within the MAPFRE Group companies- each Group entity is responsible for and must approve and implement its own *Prevention Model* in accordance with the criteria established in this document, without prejudice to its adaptation to the regulations applicable to it. Each Group entity will inform the Corporate Compliance Department of its compliance with this obligation.

## **5 Criminal liability regime for legal entities**

### **5.1 Crimes that a legal entity can commit**

The criminal liability of legal entities was introduced into the Spanish Penal Code by *Organic Law 5/2010, of June 22, which modifies Organic Law 10/1995, of November 23, of the Penal Code*, which came into force on December 23, 2010.

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

Article 31 *bis* of the *Penal Code* establishes that criminal liability may be attributed to legal entities:

- a) Of the 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 a body of the legal entity, are authorized to make decisions on behalf of the legal entity or hold powers of organization and control within it.
- b) Of the crimes committed, in the exercise of social activities and on behalf of and for the direct or indirect benefit of the same, 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 of the serious breach by them of the duties of supervision, monitoring and control of their activity given the specific circumstances of the case.

The Company is clearly committed to preventing the commission of crimes within its organization. To this end, the Company conducts a thorough analysis of its operations and activities to identify the criminal risks to which it is exposed, defines which criminal conduct may give rise to liability, identifies the areas where the identified crimes may materialize, and reviews the procedures implemented to prevent, mitigate, or avoid the risk of committing such conduct, in accordance with the *Compliance Policy*.

## 5.2 Penalties or accessory consequences applicable to legal entities

The penalties or accessory consequences that may be imposed on legal entities in accordance with *articles 33.7 and 129 of the Penal Code* are:

- a) Fine by quotas or proportional.
- b) Dissolution of the legal entity.
- c) Suspension of its activities for a period that may not exceed five years.
- d) Closure of their premises and establishments for a period that may not exceed five years.
- e) Prohibition from carrying out in the future the activities in the exercise of which the crime was committed, facilitated or concealed.
- f) Disqualification from obtaining public subsidies and 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 Criminal liability Exemption

For the crimes that may generate criminal liability of the legal entity, referred to in the *Catalogue*, *article 31 bis of the Penal Code* establishes, as a cause of exemption from criminal liability, the fact that there is a prevention model that allows avoiding or significantly reducing the risk of committing crimes.

For this model to be considered effective, it must meet the following requirements:

- i) Identify the activities within which the crimes that need to be prevented may be committed.
- ii) Establish the protocols or procedures that specify the process of forming the will of the legal entity, adopting decisions, and executing them in relation to those.
- iii) Having adequate financial resource management models in place to prevent the commission of crimes that need to be prevented.
- iv) Impose the obligation to report possible risks and non-compliance to the body responsible for monitoring the operation and compliance of the prevention model.
- v) Establish a disciplinary system that adequately sanctions non-compliance with the measures established by the model.

- vi) Perform a periodic review of the model and its possible modification in case of relevant infringements, changes in the organization, in the control structure or in the activity carried out.

Accordingly, if any of the aforementioned crimes are committed and it is proven that the Company had a suitable model in place and applied it effectively, it will be exempt from criminal liability. If the model is not entirely satisfactory or has not been applied with the appropriate level of rigor, the exemption will not be complete, but liability may be mitigated.

## **6 General prevention tools**

The Company has robust procedures in place for identifying, managing, controlling, and communicating the risks to which it may be exposed, as well as appropriate internal control mechanisms, including reliable administrative and accounting procedures. It also has a corporate governance system that forms the basis for the integrated control system within the *Prevention Model*.

The Company has, among others, the following prevention tools:

- Internal regulations: In accordance with the *Corporate Policy on the development and organization of the rules that constitute the corporate governance system of the MAPFRE Group*, the following types of rules exist:
  - “Policies” establish principles, objectives and guidelines for action of a general nature in a specific subject or sector of activity.
  - The “Regulations Governing the Operation of Governing Bodies” outline the responsibilities and powers assigned to each body.
  - The “General Procedures” develop what is established in the Policies and the Regulations Governing the Operation of the Governing Bodies, including specific guidelines for action.
  - The “Organizational Documents of an Area, Directorate or Function” describe and systematize the activities and processes specific to an area, directorate or function. They can take the form of manuals or protocols.
- Corporate governance system: This system guarantees proper management and control, with broad participation of board members and executives in decision-making. This management model promotes the delegation of functions and responsibilities, ensuring that the most important decisions, at all levels, are rigorously analyzed by the corresponding management teams, both before and after their implementation.

## 6.1 Internal regulations

- ***Institutional and Business Principles of the MAPFRE Group*** (“*Institutional Principles*”). Approved by the Company’s Board of Directors. They constitute the minimum framework that all entities of the Group and their respective governing bodies must comply with, adapting their internal regulations and actions to the principles and standards defined therein.
- ***Corporate Bylaws of MAPFRE S.A.***, 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 activities and operations of the Company.
- ***Regulations of the Board of Directors of MAPFRE S.A.***, govern the operation of its Board of Directors and other statutory bodies. In accordance with these regulations, the Board of Directors 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 should 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 System of the Company as the ideal and preferred 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 regulating the behavior of the Company contained in the *Code of Ethics and Conduct* , in accordance with the applicable regulations.
- ***Internal rules of conduct in the security markets***, which regulate 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 applicable, with those of other entities of the Group listed on secondary markets.
- ***Other internal corporate rules***. The Company has a comprehensive set of internal corporate rules that govern essential aspects of its governance and operation. These rules cover, among other things, matters related to corporate governance and organization, ethics and integrity (including anti-corruption, human rights, and anti-fraud policies), tax and financial management, communication with shareholders and investors, diversity and equal opportunities, health, safety, and well-being in the workplace, data protection and cybersecurity, as well as sustainability and environmental responsibility. They also include guidelines on the procurement of goods and services, conflict of interest management, purchasing procedures, corporate transactions, and digital operational resilience.



- **Solvency II Policies.** In accordance with the provisions of the *Solvency II Directive*, MAPFRE S.A. and the Group's insurance and/or reinsurance entities have 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 regulations, security, environment, etc.
- **Continuous training.** The Company has a global training model organized through the Corporate University's Schools of Knowledge, which bring together training programs developed at both global and local levels. E-learning courses include, among others, those on the *Code of Ethics and Conduct* and internal control standards, audit training, and a specific course on the Compliance Function. This last course explains the Compliance Function, its objectives, and responsibilities, emphasizing the importance of its implementation to minimize the legal and compliance risks to which the entities are exposed. This global tool is available to MAPFRE Group entities; however, each Group entity is responsible for raising awareness among its own staff and ensuring their continuing education through its own training plan.
- **Corporate sustainability.** MAPFRE Group has with a mandatory regulatory framework for sustainability, applicable to all its entities and their respective governing bodies. This framework establishes guidelines that enable any entity to develop and promote socially responsible behavior, regardless of the form—conventional and/or digital—in which the business is conducted and the country in which it operates. Internal regulations include principles of action that are transversal to the entire organization, forming the basis for building a global commitment to sustainability and sustainable development.
- **Investor Relations.** A permanent communication channel exists between the Company and its shareholders to address their inquiries and requests for information. For this purpose, an email address, a toll-free telephone number, and the inquiry form on the corporate website are available. Furthermore, the Company has internal regulations that reflect its commitment to shareholders, both individual and institutional, transparently ensuring their full effectiveness and its commitment to creating sustainable value.
- **Corporate website.** The Company makes public, through its corporate website [www.mapfre.com](http://www.mapfre.com), all relevant communications submitted to the Spanish National Securities Market Commission (CNMV) and other official bodies, as well as any other information required for publication, corporate governance policies, and any other information it deems appropriate to disseminate to clients, shareholders, and investors. This website also includes a form for submitting inquiries and requests from shareholders and investors, both individual and institutional.



- **Other rules and procedures.** There are rules and procedures that regulate specific matters, the objective of which is to prevent criminal conduct. These cover, among other things, matters related to corporate governance and organization, including directors' remuneration, shareholder dividends, and procedures for managing and approving related-party transactions. They also address aspects of financial management and human resources, including the prevention and handling of harassment. In the digital sphere, they regulate the right to disconnect, the use of electronic communications, data protection and governance, cybersecurity, and the management of external data, strengthening operational resilience. They also regulate matters related to digital communication and marketing and include guidelines on customer relations.

## 6.2 Internal Governance

### a) Management and supervisory bodies

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

- **The General Shareholders' Meeting** is the highest governing body of the Company, through which the will of the shareholders is expressed. It is governed by the provisions of the law, the Company's bylaws and its own regulations, as well as any implementing rules.
- **Board of Directors** is the highest administrative and representative body of the Company and focuses its activity, within the terms of the applicable regulations, on establishing the structure of the Group, defining its strategic objectives and the general guidelines that must be followed at the Group level and supervising their compliance with full respect for the decision-making capacity and responsibility of each of the companies that make up the Group.
- **Delegated Commission:** It acts as a delegated body of the Board of Directors. It is permanently vested with all the powers of the Board of Directors except those that are legally non-delegable.
- **Other Commissions of the Board of Directors:**

The Board of Directors also has the following advisory and information committees, without executive functions, and with powers of information, advice and proposal within their respective areas of action, whose functions are defined in the *Regulations of the Board of Directors*:

- **Audit Commission:** It is responsible for, among other things, internal control, internal audit, risk management, financial and non-financial information, auditing of accounts and verification of sustainability information.

- **Appointments and Remuneration Commission:** It is responsible, among other things, for evaluating the skills, knowledge and experience required in the Board of Directors, establishing a representation target for the least represented gender in said body, proposing the appointment of independent directors and proposing the remuneration policy of the directors.
- **Risk, Sustainability and Compliance Commission:** supports and advises the Board of Directors on defining and evaluating risk policies, determining risk propensity and risk strategy, and defining and overseeing the *Sustainability Policy* and Sustainability Strategy. It also understands and assesses risk management methods and tools, monitoring the results and validation of applied models, and promotes, guides, and oversees sustainability principles, commitments, objectives, and strategy. Furthermore, it is responsible for overseeing compliance with internal and external regulations, particularly the *Code of Ethics and Conduct*, the *Compliance Policy*, the rules and procedures for preventing money laundering and terrorist financing, and the *Criminal Prevention Model*, as well as submitting proposals for their updating and improvement to the Board of Directors.

#### b) Governing bodies

- **Executive Committee:** The Executive Committee is the body that, by order of the Board of Directors, oversees the management of the different businesses and activities, through the corporate and regional areas, and ensures the coordinated action of the countries, regions and business units of the Group.

#### c) Other committees

MAPFRE Group has, among others, the following committees:

- **Corporate Sustainability Committee:** The MAPFRE Group has a Corporate Sustainability Committee, an internal body with executive functions and the authority to provide information, advice, and make proposals on sustainability matters, in accordance with the powers conferred upon it in its internal operating regulations. This committee is responsible for periodically reporting to the Board of Directors of MAPFRE S.A., and/or its relevant advisory committee, on the progress made in complying with the *Sustainability Policy* and the sustainability strategy. Furthermore, among its responsibilities, it monitors international sustainability initiatives, and the commitments made by the MAPFRE Group at any given time, as well as evaluating and proposing, where appropriate, to the relevant body, the adoption of new initiatives related to this area of action that are relevant to the Group.

- **Security and Business Continuity Committee:** It is the highest executive body in these matters and ensures that business objectives and needs govern the activity of the Corporate Security and Business Continuity Function and guarantee that it is considered as a constituent element of corporate business processes.
- **Global Business Committee:** Responsible for analyzing the development of the insurance and services businesses of the MAPFRE Group, compliance with established plans, and proposing corrective and improvement actions.
- **Underwriting Policy Committee:** Together with the Global Business Committee, this committee is responsible for the correct application of the *Underwriting Policy*, analyzing and proposing operational exclusion rules on ESG issues in the Group's insurance underwriting processes. Among the committee's various functions is verifying compliance with underwriting commitments.
- **Acquisitions Committee:** intervenes, directs and coordinates the work to be carried out in each acquisition or divestment process, such as the technical valuation, the development of *due diligence* (extensive 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 an advisory body, providing its assessment to the governing bodies responsible for making the final decision on that acquisition or divestment.

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

- **Transformation and Innovation Committee:** It participates in defining the main lines of action and in the design, monitoring, and follow-up of the execution of new projects. It coordinates MOi (*MAPFRE Open Innovation*), the innovation platform created to advance towards new business models and solutions arising from digital and technological changes.
- **Human Resources Committee:** established to promote coordinated action regarding the selection, appointment, professional development, and compensation of management personnel. Its decisions are geared towards achieving the strategic objectives set by the Board of Directors.

#### **d) Internal Control System**

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

#### **e) Key Functions of the Governance System**

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

#### **f) Three lines of defense model**

The Company has adopted the three lines of defense model for risk management:

- i) A first line of defense comprised of employees, management, and the operational, business, and support areas responsible for maintaining effective control over the activities they perform as an inherent part of their daily 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 established limits.
- ii) A second line of defense comprised of the Risk Function, the Actuarial Function, the Compliance Function and other assurance functions, who ensure the functioning of internal control and risk management systems.
- iii) A third line of defense constituted by the Internal Audit Function, which performs the independent evaluation of the adequacy, sufficiency and effectiveness of the internal control and risk management systems, communicating any deficiencies in a timely manner to the parties responsible for applying corrective measures, including senior management and governing bodies as appropriate.

### **7 Supervision and control of the *Model***

The supervision of the operation and compliance of this *Model* corresponds to the Corporate Compliance Directorate, as responsible for the Company's Compliance Function in the terms established by the approved *Compliance Policy*, which aims to ensure that the Company operates within the regulatory compliance framework in order to achieve a global compliance environment.

To this end, the Corporate Compliance Department identifies, assesses, monitors, and reports on the risk of non-compliance in its activities. Non-

compliance risk is defined as the risk of legal or regulatory penalties, material financial losses, or reputational damage that the Company may suffer as a result of non-compliance with applicable laws, regulations, rules, internal and external standards, or administrative requirements.

The effective management of these risks is considered a basic impetus for the sustainable and profitable growth of the Company, contributing to the protection of its solvency, integrity and reputation, and supporting the achievement of its strategic objectives.

In this regard, the Corporate Compliance Department carries out the function of supervision and control of the *Prevention Model* in the Company, performing the following activities in the field of criminal prevention:

- i) Monitor the operation and effectiveness of the *Model* and ensure its compliance in the Company.
- ii) Identify the activities within which the crimes to be prevented may be committed, as well as evaluate the existing controls for their mitigation and propose, where appropriate, the relevant recommendations, adopting and/or proposing the adoption of the appropriate measures to guarantee compliance with the *Model*.
- iii) To periodically inform the Board of Directors of the Company, through the Risk, Sustainability and Compliance Commission, of significant incidents or anomalies related to the Company's *Model* and, in particular, to make it aware of the possible insufficiency of the resources allocated to guarantee 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 Company, after a report from the Risk, Sustainability and Compliance Commission.
- v) Report to the Board of Directors of the Company, through the Risk, Sustainability and Compliance Commission, on the established action plans, indicating the initiatives and measures to be adopted in the exercise 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 Company *Model* in order to provide the Company's governing bodies with a reasonable level of assurance regarding its monitoring, compliance and adequacy.
- vii) Ensure the dissemination and training on the principles of the *Model*, with the collaboration of the Corporate Area of People and Organization.
- viii) Modify or periodically update the Company *Model* and the internal procedures and rules that form part of it in the face of relevant infringements,

changes in the organization, in the control structure or in the activity carried out.

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

## **8 Methodology for criminal risk management**

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

The criminal risk management process is a homogeneous process that allows the Corporate Compliance Department to carry out the indicated periodic evaluation to test said implementation and effectiveness, evaluate the criminal risks to which the Company is exposed, identify the processes and activities in which the crimes that must be prevented may be committed, identify and evaluate the controls implemented to prevent the commission of said crimes and establish a review of the effectiveness of the *Model*.

The main phases of this management process are detailed below:

- i) Risk identification.
- ii) Inherent risk assessment.
- iii) Residual risk assessment.
- iv) Determination of risk appetite.
- v) Conclusions and action plan.
- vi) Monitoring and continuous improvement.

The Corporate Compliance Department periodically verifies that the controls implemented to mitigate the risk of criminal activity are in place and are adequate and sufficient. To this end, in accordance with the *Compliance Policy*, it prepares an annual Activity Report, which details, among other things, the management of non-compliance risk, specifying the status of existing controls to mitigate each of the crimes that may be committed within its operations and the results of the verification carried out during that year.

## **9 Model Update**

The Corporate Compliance Department is responsible for continuously reviewing this document, and updating them as necessary, to ensure that their provisions remain valid and up-to-date. In this regard, it will propose modifications or updates to the *Prevention Model* to the Board of Directors in the event of significant breaches or changes in the organization, control structure, or business activities, and will periodically inform the Board, and in any case through the

Annual Report of Activities it prepares, of any further modifications or updates to the *Model*.

## **10 Resource management**

The Company's *Prevention Model* is equipped with the relevant financial, material and human resources necessary for its proper and effective functioning.

The Corporate Compliance Department reports annually to the Risk, Sustainability and Compliance Commission, for submission to the Company's Board of Directors, on the annual budget for the function necessary for its proper execution, as well as on the sufficiency of resources or means (material, economic and/or personal) that the Company has to maintain an adequate level of control of the activities that generate criminal risks and mitigate the risk of committing illegal conduct.

## **11 Internal Information System Committee**

The Internal Information System Committee is responsible for the Company's Internal Information System. It is a collegiate body appointed by the governing body.

This Committee allows the Company to act diligently in the event of a possible breach of the *Model* by following a procedure for action in the event of any suspicious activities.

Its composition and operation are regulated in the *Corporate Policy of the Internal Information System* and in the *MAPFRE S.A. Information Management Procedure* approved by the Company.

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

## **12 Model non-compliance: notifications of suspicious activity and sanctioning procedure**

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

Any person, including the Company's employees, who has any indication or suspicion of possible irregular conduct or potentially illegal acts or acts contrary to the Law or internal regulations within the Company, including, in particular, any conduct that could constitute a crime, a serious or very serious administrative offense or an infringement of European Union Law, must report them through the enabled Internal Information System.

Without prejudice to the autonomy and independence of the MAPFRE Group entities and the different Internal Information Systems established in each of



them, their Compliance Officers must inform the Corporate Compliance Director of complaints that, in view of the possible impact on the Group as a whole, are determined in the *MAPFRE S.A. Information Management Procedure*, under the terms established in the management procedures approved by each entity.

Maximum confidentiality is ensured regarding the identity of the informant and any person included in the complaint, and the necessary reasonable support and protection measures are adopted to protect informants against all forms of retaliation or attempted 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 or bad-faith complaint or information is made.

Failure to comply with the internal regulations that incorporate the company's organizational and management model, and especially with the measures established for the monitoring, control, and prevention of crimes referred to in this *Model*, constitutes a labor infraction and may be subject to sanctions. For groups acting on behalf of, for the account of, or in any way in the interest of the Company, such non-compliance may result in the termination of their contractual relationship. All of this is without prejudice to any applicable administrative or criminal penalties.

The disciplinary procedure for the Company's employees is applied by the Corporate Human Resources and Organization Department in accordance with the disciplinary regime established in the collective bargaining agreement and applicable labor regulations. Notwithstanding the foregoing, appropriate measures must be taken to ensure the effective application of the established disciplinary regime.

### **13 Model Documentation**

The implementation and development of the *Prevention Model* must be documented. This documentation must be kept for at least 10 years, or until the expiration of the corresponding statute of limitations for the offense if it is longer.

The duty to preserve the aforementioned documentation for the indicated period is the responsibility of the Corporate Compliance Department.

### **14 Training**

The Company includes in its training plans specific training actions on the prevention of criminal risks, managed by the Corporate Compliance Department in coordination with the Corporate People and Organization Area.

### **15 Supervision, dissemination and monitoring**

The Corporate Compliance Department is the Promoter of this *Model*, as defined in the *Corporate Policy on the development and organization of the rules that constitute the corporate governance system of the MAPFRE Group*.

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

The *Institutional and Business Principles of the MAPFRE Group*, the *Code of Ethics and Conduct* and the *Prevention Model* are made available to all employees of the Company through their inclusion in the Intranet.

Likewise, the *Institutional and Business Principles of the MAPFRE Group*, the *Code of Ethics and Conduct* and an extract of the *Prevention Model* are available on the Company's corporate website, so that any third party may be aware of the Company's interest in the prevention of crimes within its organization and may report, through the channel provided for this purpose, the possible commission of crimes or conduct contrary to the Company's internal regulations.

## **16 Approval and entry into force of the *Model***

The *Model* was initially approved by the Board of Directors of the Company on April 28, 2017 and last modified on December 22, 2025, derogating and replacing the previously valid version.