

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



## **ANTI-CORRUPTION POLICY**

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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 these powers, it approves and updates the corporate policies that govern the actions of the Company and establishes the guidelines and basic principles that inspire, govern or are the basis of mandatory compliance with the rules that the other companies of the Group approve within the scope of the decision-making capacity and responsibility of each of them.

The MAPFRE Group affirms its commitment to conduct its operations in the countries where it operates in an ethical manner and in accordance with applicable regulations, and ensures that its members act in accordance with the highest standards of professionalism, integrity and sense of responsibility set out in the *MAPFRE Group's Institutional and Business Principles* and in the *Code of Ethics and Conduct*, fundamental pillars of its ethical performance.

As signatories to the United Nations Global Compact, the Group's companies align their strategies and operations and integrate its principles of action into their ordinary management, in a manner consistent with the measures to prevent corruption established by the United Nations Convention against Corruption.

The Board of Directors of the Company has approved this *Anti-Corruption Policy* (the “**Policy**”), which forms part of the MAPFRE Group's corporate governance system and specifies and develops its commitment to comply with the laws in force in all the countries in which it operates, as well as to reject corruption in all its forms, including extortion and bribery. Thus, this *Policy* establishes rules of conduct and an effective framework for preventing and detecting corrupt practices in any of the Group's companies.

### 2 Qualification

This regulation is a corporate policy in accordance with the classification set out in the *Corporate Policy on the development and organization of the standards that constitute the corporate governance system of the MAPFRE Group*.

### **3 Purpose**

This *Policy* establishes the general principles that allow the prevention, detection, and where appropriate, investigation and mitigation of any form of corruption within the MAPFRE Group and, in particular:

- a) Promote an ethical culture aimed at preventing situations or risks of corruption, projecting a message of "zero tolerance" and absolute rejection of corruption in all its forms and the firm will to combat it in its activities.
- b) Establish effective mechanisms and controls to fight corruption, establishing roles and responsibilities.
- c) Manage and mitigate corruption risks through a systematic and effective process for their identification and evaluation, including the periodic assessment and verification of controls.

### **4 Scope of application**

This *Policy* applies to all companies within the MAPFRE Group. It also applies, where appropriate and in accordance with the relevant shareholder agreements, to the various alliances and joint ventures in which Group companies participate.

This *Policy* inspires, defines and governs the way in which these companies and their administrators, directors and professionals act in the development of their activity regardless of where they are located.

The companies that constitute the Group also promote that the third parties with whom they contract (suppliers, intermediaries, collaborators, etc.) are governed by patterns of conduct and values analogous to those established in this *Policy* and may even condition their contracting on their express adherence and commitment to comply with this *Policy*.

### **5 Commitments and rules of action against corruption, bribery and extortion**

The MAPFRE Group prohibits all types of corruption, bribery and extortion and expresses its firm commitment to eradicating them from all its activities.

To this end, it rejects unethical practices aimed at inappropriately influencing the actions and will of individuals in order to obtain advantages or benefits, and it abides by the following commitments and standards of conduct:

#### **5.1 Zero tolerance**

MAPFRE Group companies promote a preventive culture based on the principle of "zero tolerance" towards corruption and bribery.

The MAPFRE Group does not tolerate or permit any irregular, illegal, or unlawful conduct, or any behavior contrary to the principles of this *Policy*, nor any conduct constituting corruption in any form, including extortion and bribery, in the performance of business or professional activities, or in relations with the public or private sector. Any conduct that may constitute bribery, extortion, or influence peddling within the framework of the Group's companies' activities, or that uses violence or intimidation to obtain a benefit, is prohibited.

Likewise, the Group's companies undertake not to influence the will, objectivity and actions of third parties to obtain advantages or benefits through unethical or illegal practices.

## **5.2 Ethical conduct**

The administrators, managers, and professionals of the Group's companies may not solicit, accept, receive, promise, offer, grant, or make gifts, payments, invitations, commissions, compensation, favors, or advantages of any kind to obtain consideration or to improperly influence or gain an undue advantage in business or professional relationships with individuals or public or private entities, authorities, public officials, employees, directors, or managers of public or private companies or bodies, private companies, organizations, political parties, politicians, or candidates for public office. They may not carry out such actions either directly or indirectly (through intermediaries or by inducing third parties in any way).

Individuals subject to this *Policy* who interact with authorities, governments, public administrations, or political representatives must be aware of and comply with the obligations set forth in current regulations and the applicable corporate governance system. Only expressly designated individuals are authorized to communicate with these entities on behalf of the Group companies. Any *lobbying activity* will be conducted in full compliance with the regulations applicable in each jurisdiction and the corporate governance system.

The MAPFRE Group rejects any activity that may constitute influence peddling and, in particular, any attempt to unlawfully influence officials or authorities by using personal relationships in order to obtain advantages or benefits.

Facilitation payments of any kind are prohibited. A facilitation payment is defined as any payment intended to expedite procedures or actions required by public officials, even if such payment does not seek an undue or illegal benefit.

Individuals subject to this *Policy* must avoid situations that could give rise to an actual, potential, or apparent conflict of interest. Any conflict of interest must be reported and managed in accordance with the *Conflict of Interest Management Policy for Senior Management and Executives* and any other internal procedures established pursuant to this *Policy*.

### **5.3 Acting on behalf of MAPFRE**

Any person acting on behalf of or representing any of the Group's companies must act in accordance with this *Policy* and must behave ethically and in accordance with applicable regulations and the corporate governance system.

Furthermore, any person acting on behalf of MAPFRE Group companies is prohibited from making or accepting bribes or payments or the delivery of any goods made for the purpose of improperly obtaining or maintaining business or any other undue business advantage.

### **5.4 Relationship with suppliers and collaborators**

Employees, suppliers, intermediaries or contractors in general of any of the Group's companies must share the values expressed in this *Policy* and comply with the laws applicable to them in their relationships with the MAPFRE Group.

The Group companies' relationship with them is based on legality, ethics, transparency, and honesty. It is prohibited, directly or indirectly, to offer or grant gifts, presents, or other undue benefits or unauthorized advantages to officials, authorities, third parties, or any person related to the Group companies, with the aim of obtaining preferential treatment or undue benefits in the signing or maintenance of contracts with the Group companies.

MAPFRE Group companies implement procedures and controls and promote appropriate measures to verify ethical correctness, transparency and integrity, both in the selection process of these groups and during the course of their contractual relationship, as well as their adherence to and compliance with the policies, rules and procedures established in the Group for the prevention of corruption in any of its forms and manifestations.

### **5.5 Political neutrality**

MAPFRE Group companies maintain a position of respect, independence and neutrality towards the different political options in each country.

Consequently, the Group's companies do not finance, support, or contribute to political campaigns and do not make direct or indirect donations to political parties, or their representatives or candidates.

### **5.6 Donations and sponsorships**

Any donation, sponsorship, or patronage must be lawful, appropriate, and compliant with applicable legal frameworks and corporate governance systems and must be properly documented. It must also be transparent, justified, reasonable, proportionate, and pursue legitimate business objectives, and may not be used to unduly influence decisions by third parties. Transactions that could harm the MAPFRE Group's brand or reputation are prohibited.

The management of donations, sponsorships and patronage in the Group's companies is carried out in accordance with internal regulations that establish the appropriate procedures and controls in order to avoid activities contrary to this principle.

### **5.7 Business relationships**

MAPFRE Group companies do not accept business or carry out transactions that involve a breach of applicable regulations or the corporate governance system.

The MAPFRE Group maintains relationships and transactions with reliable and ethical business partners and ensures that it establishes contractual relationships with those who demonstrate (i) an appropriate reputation and track record of ethical commitment; (ii) behavior aligned with the *Purpose, Vision and Values* set out in the *MAPFRE Group's Institutional and Business Principles*; and (iii) ethical, sustainability and good governance commitments aligned with the commitments assumed by the MAPFRE Group.

Corporate operations (i.e., mergers, acquisitions, divestitures, *joint ventures*, or any other transaction of a similar nature) are carried out with due diligence, analyzing, assessing, and documenting the legal and non-compliance implications and risks (among others), especially those related to corruption, incorporating specific contractual safeguards against such risks.

### **5.8 Purpose of the services and documentation obligations**

All services provided to or received by MAPFRE Group companies are legitimate, and both their nature and price must be duly documented in a contract previously approved by the competent authority. Payments made by MAPFRE Group companies must reasonably and rationally reflect the value of the consideration received. Payments to individuals or legal entities other than those named on the corresponding invoice or contract are prohibited.

MAPFRE Group companies accurately and transparently reflect all their actions, transactions, and operations, in accordance with the laws in force in each territory, and document them in the legally established books and records. Each Group company gathers documentation that demonstrates its diligent activity regarding its expenses, procurement and purchasing procedures, and the acquisition of the necessary approvals.

### **5.9 Risk identification and establishment of controls**

The Group's companies identify and assess the risks associated with corruption that may be present in their activities and have appropriate controls and measures in place to ensure that their activities and business are carried out in accordance with this *Policy*.

In order to promote an ethical, transparent and sustainable corporate culture, each MAPFRE Group company is responsible for and must approve and

implement suitable prevention instruments regarding the risks associated with corruption that are applicable to them.

## **6 Failure to comply with this *Policy***

Failure to comply with the obligations arising from this *Policy* or from the applicable legislation may result in administrative, civil and/or criminal penalties for the Group companies and/or the persons involved in the events, as well as significant damage to the reputation of the Group companies or the Group as a whole.

In the event of such breaches, the Group companies may take contractual or disciplinary action and, where appropriate, bring legal action against the offenders.

In this regard, the Human Resources Departments or Divisions of the Group companies will apply the disciplinary regime and sanctioning procedure established for all individuals employed by the Group companies. For those acting on behalf of, for the account of, or in the interest of the Group companies, non-compliance may result in, among other consequences, the termination of their contractual relationship, without prejudice to the exercise of any applicable legal or contractual actions.

## **7 Training**

The Group's companies are committed to promoting a culture of combating all forms of corruption and bribery. Their directors, managers, and professionals receive regular and appropriate training to ensure adequate awareness and effective compliance with this *Policy*.

The Compliance Function of each company is responsible for determining the scope, frequency, traceability and nature of the training provided and the appropriate communication plans in relation to this *Policy* based, among other things, on the risk exposure to which each of the people who receive it are exposed.

## **8 Internal Information System**

MAPFRE Group companies have established appropriate channels for reporting potential breaches of this *Policy* or any acts or conduct within their organizations that could foster corruption in any of its forms. To this end, they have an Internal Information System, which serves as the ideal and preferred channel for communicating and managing information or complaints regarding violations of the principles and standards of conduct referenced in this *Policy*.

Anyone who has knowledge or reasonable suspicion of irregular actions, acts contrary to this *Policy* and, in general, any case of corruption must report it to the Internal Information System established in their entity.

In accordance with the guiding principles of the Internal Information System, the Group companies manage good faith complaints appropriately, with full guarantees of confidentiality and protection against retaliation, and take appropriate measures regarding any act of corruption that may occur within them, informing the competent authorities and taking the appropriate legal actions, where appropriate.

## **9 Supervision, dissemination and monitoring of this *Policy***

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

Furthermore, in accordance with the provisions of the *Compliance Policy*, the Corporate Compliance Department will be responsible, together with the Compliance Officers of the Group entities in their respective areas of operation, for monitoring compliance with this *Policy*.

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

As part of the *Company's commitment* to its stakeholders, this *Policy is being given* appropriate dissemination to ensure it is known both internally and externally by the various stakeholder groups. To this end, this *Policy* is published on both the corporate intranet and the corporate website.

## **10 Approval and entry into force of this *Policy***

This *The Policy* was initially approved by the Company's Board of Directors on December 21, 2020 and last amended on December 22, 2025, repealing and replacing the previously valid version.