



POLICY ON THE RESPECT AND PROTECTION OF HUMAN RIGHTS

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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 context, the Company’s Board of Directors has approved this *Policy on the Respect and Protection of Human Rights* (the “**Policy**”), which reflects the Mapfre Group’s institutional and corporate commitment to human dignity, equality, and non-discrimination, in alignment with the highest international standards.

This *Policy* not only establishes guidelines to ensure respect for human rights across all Group activities, but also promotes their integration into business strategy, risk management, and stakeholder relations, strengthening the Group’s commitment to sustainability and corporate ethics.

This *Policy* is part of the Company’s corporate governance system, and it has been developed based on the *Institutional and Business Principles of the Mapfre Group* and the Company’s Purpose, Vision, and Values as defined by its Board of Directors.

2 Classification

This standard is a corporate-level policy in accordance with the classification set out in the *Policy on the Development and Organization of the Rules that Comprise the Mapfre Group’s Corporate Governance System*.

3 Purpose

The purpose of this *Policy* is to formalize and develop the Mapfre Group's commitment to human rights as recognized in applicable regulations, and to define the basic principles of conduct that will apply within the Mapfre Group for human-rights due diligence, in accordance with applicable laws and/or with:

- a) *The United Nations International Bill of Human Rights; the 10 Principles of the United Nations Global Compact; the United Nations Guiding Principles on Business and Human Rights; the Guidelines of the Organization for Economic Cooperation and Development (OECD) for Multinational Enterprises; the UN Women's Principles; the Global Conduct Standard for the protection of LGBTI people in business; the principles and rights established in the main conventions of the International Labour Organization ("ILO"); the ILO Declaration on Fundamental Principles and Rights at Work; the Principles for Sustainable Insurance (PSI); the United Nations Principles for Responsible Investment (PRI); as well as any documents and texts that may replace or supplement those referenced above.*
- b) *The Code of Ethics and Conduct and the Institutional and Business Principles of the Mapfre Group.*

Respect for human rights is embedded in each of the United Nations 2030 Agenda Sustainable Development Goals, to which the Mapfre Group has made a public commitment; these goals are founded on prosperity, the planet, and people as essential pillars of sustainable development.

4 Scope of application

This *Policy* 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.

Likewise, it applies to those who, by maintaining a close or ongoing collaborative relationship with Mapfre Group companies, adhere to or become subject to the principles and commitments set out in this *Policy* as a consequence of the nature or purpose of their activities.

5 Basic principles of conduct

The Mapfre Group adopts and promotes the following principles in the area of human rights:

- a) Respect the principles and rights recognized in the international declarations and standards on which this *Policy* is based.
- b) Foster and promote respect for and the advancement of human rights in the local, national, and international communities in which it conducts business and/or with which it interacts.
- c) Reject discriminatory practices or any conduct that undermines human dignity on the basis of age, gender, marital status, nationality, religion, disability, race or ethnicity, or any other personal circumstance, in line with ILO Conventions 100 and 111, which guarantee equal remuneration and non-discrimination in employment and occupation.
- d) Reject child labor, complying with ILO Convention 138 regarding the minimum working age under the legal framework of the relevant country, and with ILO Convention 182 on the protection of children in hazardous and exploitative labor situations.
- e) Reject forced or compulsory labor, in accordance with ILO Conventions 29 and 105, as well as human trafficking.
- f) Respect freedom of association, the right to organize, and collective bargaining, in line with ILO Conventions 87 and 98, which guarantee the autonomy of workers' and employers' organizations and promote conditions for effective collective bargaining.
- g) Implement supervisory and control procedures that enable the detection, with due diligence, of any possible situations that risk violating human rights and the introduction of mechanisms to prevent and mitigate these risks.
- h) Remedy adverse impacts on human rights that the actions of Mapfre Group companies may cause to their stakeholders or the communities with which they interact, ensuring access to remediation mechanisms and avoiding any obstruction.

6 Specific commitments for different stakeholder groups

6.1 Mapfre Group personnel

The Group has internal policies and standards that guarantee the rights of individuals who work within its companies. Accordingly, it respects and promotes the observance of the following rights internally:

- a) The right to freedom of opinion, information, and expression, respecting the diversity of viewpoints and fostering dialogue and communication.

- b) The right to freedom of association, organization, and collective bargaining, as well as recognition of the role and responsibilities of worker representation bodies, in accordance with the applicable laws in each country.
- c) The right to privacy and personal data protection, as well as the right to personal dignity and confidentiality.
- d) The right to a safe and healthy working environment.
- e) The right to dignified working conditions, including fair compensation and equal treatment, avoiding any unjustified differentiation not based on merit or on requirements inherent to the position.
- f) The right to a workplace free from harassment and respectful of individuals' rights and dignity, ensuring that confidential and diligent procedures are in place to report, address, and remedy improper conduct promptly and appropriately.

Mapfre Group companies will ensure that employees, within the scope of their roles and responsibilities, respect human rights and contribute to fulfilling the Group's commitment under this *Policy*. To this end, the Group companies will provide their employees with training on this subject.

6.2 Value chain

Mapfre Group companies will promote the sharing of their human-rights commitments among the actors that make up their value chain. To this end, the Group will periodically review its processes and relationships with these actors to ensure continuous improvement in the protection and promotion of human rights, through adherence to the following commitments:

- a) **Providers:** Mapfre Group companies will encourage the providers with whom they interact to strictly respect the human rights recognized under applicable international and national regulations in the countries where they operate.

In this regard, the Group has approval systems that include reviews of fundamental rights and support mechanisms to ensure that providers with whom it maintains contractual relationships assume responsibility—within the scope of their competencies—for human-rights protection.

- b) **Business partners:** Mapfre Group companies will seek to ensure that business partners (intermediaries, distributors, etc.) with whom they maintain contractual or collaborative relationships that are relevant to

their business activities, and who may influence the Group's human-rights impacts, are aware of and respect the principles and commitments set out in this *Policy*.

Similarly, in line with the *Principles for Sustainable Insurance (PSI)*, the Group will promote collaboration with its business partners to develop solutions that support the creation and adaptation of insurance products and services that respond to emerging human-rights challenges, thereby facilitating the protection of potentially affected individuals and communities. To this end, mechanisms will be established for joint monitoring and evaluation of the impact of the solutions implemented, ensuring transparency and continuous improvement.

- c) Customers:** Mapfre Group companies commit to avoiding any unjustified discrimination among the recipients of their product offerings, while at all times respecting their privacy, the protection of their personal data, and their right to confidentiality.

They will also foster dialogue with corporate clients to encourage practices that respect human rights. Additionally, when applicable, they will integrate the minimum social safeguards and commitments adopted by the Group in its various policies, frameworks, and other standards into their underwriting processes.

- d) Portfolio companies and other investments:** Mapfre Group companies will integrate the analysis of human-rights risks and impacts into their investment decisions, in alignment with the United Nations *Principles for Responsible Investment*.

To this end, procedures will be established to identify potential violations arising from financed activities, and the necessary measures will be adopted to prevent and address them, in accordance with the policies in force regarding the integration of sustainability risks, the exercise of voting rights, shareholder engagement, or due diligence with respect to principal adverse impacts.

7 Oversight, dissemination, and monitoring of this Policy

The Corporate Sustainability Area is the Sponsor of this Policy, 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 *Policy*



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 *Policy* shall be published on the corporate website.

8 Approval and entry into force of this *Policy*

This *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 previous version.