



**INFORMATION MANAGEMENT PROCEDURE
OF MAPFRE GLOBAL RISKS, AGENCIA DE
SUSCRIPCIÓN S.A.U.**

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1. Introduction

This document contains the *Information Management Procedure* (the **“Management Procedure”** or the **“Procedure”**) for Complaints or Information made within the framework of the Internal Information System established at Mapfre Global Risks, Agencia de Suscripción S.A.U (hereinafter, *“The Entity”*).

The purpose of the Procedure is to establish the necessary forecasts for that the Internal Information System of the Entity complies with the *Corporate Policy on the Internal Information System* (the **“Policy”**), as well as with the requirements set out in current regulations, including the assignment of responsibilities to those who must be involved in its management for the proper and diligent processing of the complaints or Information received.

The terms used in capital letters and not expressly defined in this document will have the meaning attributed to them in the *Policy*.

2. Qualification

This regulation is a general procedure 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. Scope of Application

This *Procedure* applies to the Entity.

4. Internal Information System Responsible

The Internal Information System Responsible is the Internal Information System Committee of the Entity, a collegiate body appointed by the Company's Board of Directors, which is responsible for its diligent

management in accordance with the provisions contained in this *Procedure* and within the scope established in the *Policy*.

The Committee is therefore responsible for receiving and processing Complaints or Information (including their admission to processing, the initiation of investigation cases for the facts reported, the appointment of the Investigator of the investigation and the analysis of the conclusions of the investigation carried out), as well as its Resolution (determining whether or not the infringement or irregularity has occurred reported either any other) and the decision about the actions relevant to carry out , in each case.

Likewise, the Committee may agree to initiate an investigation file when it becomes aware of an Indication, without prior complaint, whether through a Discovery or through a Report.

The Committee delegates to the Secretary of the Internal Information system, under the terms and the scope established in this *Procedure*, the powers of management of the Internal Information System and processing of investigations files of Complaints or Information, among others, their receipt and preliminary analysis and the keeping of the register of Complaints or Information.

The operating system of the Internal Information System Committee will be regulated by the corresponding regulation approved to the effect. The Investigator in charge will attend the Committee's meetings to provide relevant information and clarifications on the Complaints or Information they have been assigned to investigate, whenever deemed appropriate.

5. Filing Complaints or Information

Informants included in any of the groups mentioned and about the subjects indicated within the scope of the *Policy* have access to the Internal Information System of the *Entity*.

Notwithstanding the above, any individual may approach the channel established by the Independent Authority for the Protection of Informants, AAI, available and accessible on its website (<https://www.proteccioninformante.gog.es/>) as well as to the authorities or organs competent of the Autonomous Communities, to others bodies (Bank

of Spain, SEPBLAC, CNMC, CNMV, etc.), as well as, where appropriate, the competent institutions, bodies, or agencies established in the European Union to formulate their Complain or Information.

The Informant may choose whether to file the Complaint or Information by identifying themselves with their personal data or whether to do so anonymously, using either of the following means (the “Means”):

- Corporate platform accessible via: <https://www.mapfre.globalrisks.com>
- Email: mapfre.mgr.sistemainternodeinformacion@mapfre.com
- Postal service: A/A Secretary of the Internal Information System Committee, Ctra. Pozuelo n ° 52 (28222 Majadahonda, Madrid).

Complaints or Informations may also be submitted verbally through an in-person meeting at the Informant's request, directing their request through one of the *Means* indicated above.

Once the request has been made, the in-person meeting will take place within a maximum of seven (7) calendar days. Complaints or Informations made verbally may be recorded, subject to the informant's consent, and in all cases will be documented through a complete and accurate transcription of the conversation, after which the Informant will be given the opportunity to check, correct, and accept the transcription by signing it.

The confidentiality of the identity of the Informants and Persons Affected by the Complaint, as well as the facts and data contained therein, will be ensured, even if the Complaint is received through channels or means that are not part of the Internal Information System or by individuals other than the System Responsible. For these purposes, the person who receives the complaints will ask the Informant to use the Means indicated in this *Procedure* and will be obliged, in all cases, to immediately send all the Information received to the System Responsible: mapfre.mgr.sistemainternodeinformacion@mapfre.com and to guarantee the confidentiality of the Information at all time.

6. Reception, admission and registration of complaints or information

Upon receiving the Complaint or Information through any of the indicated Means, the Secretary of the Entity's Internal Information System Committee will send an acknowledgment of receipt to the Informant who has identified themselves and provided an address, email, or secure location for receiving notifications, within seven (7) calendar days, unless doing so could jeopardize the confidentiality of the communication or the Informant was waived the right to receive information about their Complaint or Information or they submitted it anonymously. Furthermore, the Secretary the Internal Information System Committee will conduct a preliminary analysis and evaluation of the Complaint or Information and will decide, depending on the case:

a) Inadmissibility of the Complaint or Information received, for any of the following reasons:

- (i) When the content of the Complaint refers to conduct, facts, or informations not included within the scope of the *Policy*.
- (ii) When the facts are described generically or imprecisely and do it impossible to investigate the alleged irregularities reported.

Before rejecting the Complaint or Information on this basis, the Secretary of the Internal Information System Committee will request the Informant, if the Complaint or Information was not anonymous, to clarify and specify the facts to which it refers . If the deficiencies are not remedied, the Complaint or Information will be rejected, without prejudice to the subsequent initiation of an investigation, if additional information is received in accordance with the *Policy*.

- (iii) When the information received is not credible, is based on manifestly unfounded and unproven facts, or is based on mere rumors lacking credibility.
- (iv) When the Complaint or Information received does not contain new or significantly different information from that contained in previous Complaints or Information, regarding which the corresponding procedures have been concluded.

- (v) When there are indications that the Information has been obtained unlawfully. In this case, the Complaint or Information shall also be reported to the Legal Area of the Entity so that, where appropriate, the appropriate legal measures may be taken.
- (vi) When dealing with Informations related to claims about interpersonal conflicts either that affect only the Informant and the individuals mentioned in the Complaint or Information refers to, unless it deals with conducts that may constitute harassment.
- (vii) When the Complaint or Information refers to facts or situations that have also been communicated through an external channel or are being investigated in administrative proceedings or by the Courts of Justice.

If the Complaint or Information is rejected for any of the above reasons for rejection, the Secretary of the Entity's Internal Information System Committee will record the reason for the rejection in the Internal Information System Register, close the file and forward the decision to the Informant, using the contact information that they may have provided, unless the Informant has waived the right to receive communications about the Complaint or Information submitted, or has submitted it anonymously.

- b) Referral of the Complaint or Information received for the following reasons:
 - (i) When the Complaint or Information concerns matters that are clearly outside the scope of the Internal Information System as established in the Policy, such as, for example, in the case of Claims or Communications of a Commercial or Contractual Nature, which will be referred for processing through the procedures established for this purpose.
- c) When the Complaint or Information refers to persons or issues that are not related to the Entity but to another Entity of the Group, in which case the Secretary of the Internal Information System Committee will forward it to the Responsible of the Internal Information System of the competent Entity for processing, who will send an acknowledgment of receipt to the Informant. Admission of the Complaint or Information received for processing

If, after analyzing the Complaint or the Information, the Secretary of the Entity's Internal Information System Committee considers that none of the grounds for **inadmissibility or referrals** indicated in sections a) and b) above apply, it will forward it to the Internal Information System Committee of the Entity, which will analyze whether there are reasonable indications of the alleged existence of an irregularity or infringement within the scope of this *Procedure*. Based on this analysis, it will decide on the admission or rejection of the Complaint for processing and, consequently, will decide on its admission, referral or inadmissibility for processing and, in his case, the initiation of the corresponding investigation file and the designation of his investigator.

The Case Investigator (the “**Investigator**”) may be a person from the Entity or an external collaborator, at the discretion of the Committee, depending on the nature of the reported events. The Investigator may at any time request the collaboration of other areas or engage external collaborators to carry out any investigative procedures.

Both the Investigator and any third party involved in any investigation related to the facts addressed in the Complaint or Information will be subjected to the confidentiality obligations set out in the *Policy*.

In the case of Complaints or Information concerning acts that may constitute harassment in any of its forms, made within the scope and reach of the Corporate Protocol for the Prevention and Treatment of Harassment, the investigation of the case will be assigned to the Investigative Body referred to in the aforementioned Protocol. This body will carry out the investigative procedures in accordance with the internal procedure and timelines established in that document.

In case of Complaints or Informations concerning acts that may constitute internal fraud as defined in the Corporate Anti-Fraud Policy of the MAPFRE Group, the investigation of the case will be assigned to the Corporate Security Area of the Entity, which shall carry out the investigative procedures in accordance with the provisions of said *Policy*.

The Committee shall agree to suspend the processing of the case when it becomes aware of the use of external channels or the initiation of

administrative or, where appropriate, judicial procedures regarding the same facts that are subject to the Complaint or Information, and until their conclusion, without prejudice to providing the aforementioned authorities with the necessary information and support that may be required.

Likewise, when the Complaints or Information received, the evidence provided, and/or checks and investigations carried out reveal reasonable grounds to believe that the facts could constitute a crime, the Committee shall agree to forward the information on them to the Entity Legal Area to take the appropriate legal measures and, where applicable, to refer them on the Public Prosecutor's Office and, if the financial interest of the European Union are affected, to the European Public Prosecutor's Office, prior communication to the Corporate Area of the General Secretariat and Legal Affairs.

The Secretary of Entity's Internal Information System Committee shall be responsible for maintaining and updating the Register of Complaints or Informations, through a register book in which he or she shall record the Complaints or Informations received, the management and processing carried out, any internal investigations that may have been conducted and the Resolution adopted in relation thereto.

The Committee will take the necessary measures to ensure the confidentiality and protection of all data included in the Register.

Complaints or Informations processed in accordance with the Corporate Protocol for the Prevention and Treatment of Harassment, as well as their Resolutions by the Internal Information System Committee, shall be included in a specific section of the register book, under the custody and responsibility of the Responsible of the Internal Information System.

In the event that the communication received consists of a query regarding the interpretation and/or application of the MAPFRE Code of Ethics and Conduct, the Secretary of the Entity's Internal Information System Committee, will refer to the Corporate Compliance Director who, after analyzing it, will send the Informant the relevant response to the reporting person as soon as possible

7. Investigation of the facts reported

Once a Complaint or Information has been accepted for processing, the Committee may agree to conduct internal or external investigations to clarify the facts reported. Likewise, the Committee may decide to initiate an internal or external investigation file if it becomes aware of any indication, even without a formal complaint, whether through a discovery or a piece of information.

The Investigator appointed by the Committee will be responsible for coordinating and driving the investigation process, carrying out or requesting any actions they deemed necessary, requesting the requested assistance and resources, and gathering any information and documentation considered appropriate to verify the accuracy and truthfulness of the information received. The investigator may also maintain communication with the Informant and request any additional information deemed relevant to the investigation.

Based on the content of the Complaint or Information, the Affected Persons, attributed with the alleged misconduct or associated with the violation or irregularity under investigation, will have the right to be informed of the actions or omissions attributed to them and to be heard at any time in the manner and time considered appropriate to ensure the success of the investigation.

In accordance with the provisions of the *Policy*, during the processing of the file, all rights of the Affected Persons will be respected, such as the right to the presumption of innocence, the right to honor, the right to an impartial investigation of the facts, the right to defense and to use the means of evidence deemed appropriate and relevant, and the right to access the file, under the terms established by law. Access to the file shall be understood as the right to know the facts attributed to them without revealing information that could identify the Whistleblower and without compromising the outcome of the investigation. They shall also enjoy the same protection established for Informants, preserving their identity and guaranteeing the confidentiality of all facts and data contained in the file.

Notwithstanding the foregoing, the Affected Persons shall at no time be informed of the identity of the Informant, nor shall they have access to the

original Complaint or Information or to any other information that could reveal the identity of the Informant.

Once the relevant evidence has been gathered and the investigation has been concluded, the Investigator will prepare a report setting out the facts under investigation, the actions taken to verify their accuracy of those facts, and the conclusions reached during the investigation (the **“Report”**), which will be forwarded to the Entity Internal Information System Committee.

8. Resolution of the file

In view of evidence, data, investigations, and conclusions contained in the Investigating Officer’s Report, the Internal Information System Committee of Mapfre Global Risks shall issue written resolution (the **“Resolution”**) determining whether the facts that are the subject of the Complaint , Information or investigation could constitute any type of infringement or irregularity and, where appropriate, the relevant actions to be taken in each case, which may consist of:

a) The closure and the archive of the case, when the Resolution concludes that the irregularity, illegality or infringement reported or investigated has not been proven or that the responsibility of the Affected Person has not been verified.

b) The transfer of the Resolution to:

- (i) To the Human Resources Area of the *Entity*, when the Resolution concludes that the irregularity or unlawful act that has taken place can be attributed to an employee or director of the *Entity*, so that it may decide on the appropriate disciplinary, corrective, and/or preventive measures to be taken, where applicable, in accordance with applicable *labor* legislation. It shall inform the Secretary of the Entity's Internal Information System Committee, who shall forward this information the Committee.

Additionally, in the case of files involving conducts or acts that could constitute harassment in any of its forms, formulated within the scope and reach of the Corporate Protocol for the Prevention and Treatment of Harassment, the Resolution shall be forwarded, in all cases, to the

Corporate Labor Relations Department, with anonymized personal data, for the purposes of complying with the reporting obligations established in current regulations. When the legal representation of the workers has been involved in the investigation procedure at the request of any of the parties involved in it, the Resolution shall also be sent to them.

- (ii) The Appointments and Remuneration Committee, through its secretary, when the Resolution concludes that a member of the Entity's Board of Directors has committed an irregularity, unlawful act, or act contrary to the law, for the adoption of the corresponding measures. The adoption and content of which shall be reported to the Secretary of the Entity's Internal Information System Committee, who shall forward it to the Committee.
- (iii) To the Legal Area of the Entity when, despite the facts that the facts may not initially appear to constitute a crime, this is the result of the investigation of the case, for- prior communication to the Corporate Secretariat and Legal Affairs Department- taking whatever legal action it deems appropriate and, if necessary, consider referring the matter to the Public Prosecutor's Office (or to the European Public Prosecutor's Office if the financial interests of the European Union are affected) informing to the Secretary of Internal Information System Committee of the of the decision taken, who shall forward it to the Committee.
- (iv) Any other Corporate Area or department, as appropriated, based on the facts and conclusions of the Resolution for the adoption of any other measures that are deemed appropriate, the adoption and content of which shall be reported to the Secretary of the Entity's Internal Information System Committee, who shall forward it to the Committee.
- (v) The Resolution shall be issued and communicated to the Informant, when an address, email who has been identified and provided with an address, email address, or secure location for receiving notifications have been identified and indicate, unless they have waived the right to receive information about their Complaint or Information and to the Affected Persons, as soon as possible and in any case before the end of the three (3) months period from the date on which the Complaint or Information was received. If no initial acknowledgement of receipt

has been sent, the maximum period for issuing the Resolution shall be three (3) months and seven (7) calendar days from receipt.

Notwithstanding the foregoing, in case of files dealing with particularly complex facts or circumstances, at the discretion of the Responsible of the Internal System Information Committee, the indicated period may be extended to a maximum of three (3) additional months.

In the event that the Affected Person is a senior executive or a member of the governing body of the Entity, or if the Complaint or Information result in any relevant reputational risk, the Committee of the Internal Information System must inform the Corporate Compliance Director of the contents of the Complaint or Report, its processing and its timely resolution. The relevant decisions regarding the appropriate actions to be taken in light of the findings of the investigations carried out shall be adopted in a coordinated manner between the Entity's Internal Information System Committee, to which the senior manager or member of the management body affected by the complaint or report belongs, and the Corporate Compliance Director.

9. Personal Data Protection

Personal data collected within the framework of the Internal Information System will be processed in accordance with the provisions of current data protection regulations and, in particular, will comply with the principles of legality, purpose limitation, data minimization, accuracy, storage limitation, and confidentiality established in said regulations.

10. Information to governing bodies

The System Responsible shall submit annual reports to Board of Directors of Mapfre Global Risks information on the functioning of the Internal Information System, which will include at least the number of Complaints or Informations received, their origin, type, the results of the investigations, and the resolutions adopted.

Notwithstanding the above, the System Responsible shall report individually to the Board of Directors on Complaints or Information concerning financial or accounting irregularities or aspects related to sustainability that could

have a material impact on the Group's financial statements, non financial information statements or internal control.

11. Training

The Corporate Compliance Directorate jointly with the Compliance Responsible of the activities of the Compliance Function of the Entity are responsible for promoting regular communication and training activities on the operation of the Internal Information System, and raising awareness to ensure proper understanding and compliance with the *Policy* and this *Procedure*. To this end, its activities will be coordinated with the Areas of the Entity responsible for training and internal communication.

12. Supervision, dissemination and monitoring this Procedure

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

The Entity Responsible of the activities of the Compliance Function will regularly review the content of this procedure to ensure that its provisions remain valid and are properly updated and will propose to the Board of Directors of Mapfre Global Risks any modifications that may be necessary.

This Management Procedure will be including, together with the *Policy*, in a *separate and identifiable section of the home page of the website of the Entity*: www.mapfreglobalrisks.com which shall contain clear and easily accessible information on the Internal Information System and its use, as well as on the internal portal.

13. Approval and entry in vigor

This Management Procedure was initially approved by the Board of Directors of Mapfre Global Risks on February 11, 2025 and last amended on March 25, 2026, repealing and replacing the previously valid version.