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.

MAPFRE

CORPORATE POLICY ON THE INTERNAL INFORMATION SYSTEM

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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, SA 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.

Furthermore, in accordance with the *Regulations of the Board of Directors* of the Company and Article 11.1 of *Law 2/2023, of February 20, regulating the protection of persons who report regulatory infringements and the fight against corruption*, the Board of Directors is competent to establish a policy that regulates its Internal Information System.

In this regard, the Board of Directors of the Company has approved this *Corporate policy on the Internal Information System* (the " ***Policy*** "), which aims to establish the fundamental principles that govern the operation of the Internal Information System in the MAPFRE Group as the ideal and preferred channel for the communication of information or complaints about possible irregularities or illegal acts, guaranteeing confidentiality, the protection of the informant and the correct management of complaints or information.

This *Policy* is part of the Group's corporate governance system, has its origin in the *Institutional and Business Principles of the MAPFRE Group* and is based on and framed within the Purpose, Vision and Values defined by the Board of Directors of the Company.

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 Definitions

For the purposes of this *Policy*, the following definitions apply:

- "**Group Entities or Entities**": MAPFRE, S.A. and its subsidiaries and dependent companies as established in commercial legislation.

- "**Complaint or Information**": Communication about an Indication.

- "**Finding**": discovery of an indication within the framework of an internal review procedure.

- "**Indication** ": a fact from which a potential irregular conduct or potentially unlawful act or act contrary to the Law or internal regulations within the Group Entities can be inferred, including, in particular, any conduct that could constitute a crime, a serious or very serious administrative offense or an infringement of European Union Law, among others, any form of harassment in any of its forms.

- "**News**": publication in press, social networks or other social media.

- "**Informant** ": any person who has obtained or transfers the information stated in the Complaint or Information , provided that such information has been obtained in a work or professional context, whether they are employees, professionals, shareholders, participants, members of the administrative, management or supervisory bodies of the Group Entities, including volunteers, interns and trainees, suppliers, contractors or subcontractors, or any person working for or under their supervision or direction, clients and any third party in the process of acquiring any of the above conditions or having lost them.

- "**Affected Person**": natural or legal person with whom the Indication that gives rise or may give rise to an internal investigation is associated and of which knowledge is obtained by virtue of a Complaint, a Finding or a News.

- "**System Responsible or Responsible**": is the body designated by the Group Entities for the management of their Internal Information System, with the functions and responsibilities indicated in section 7 of this *Policy*.

- "**Retaliation** ": any action or omission prohibited by the legal system, or which, directly or indirectly, causes or may cause unjustified harm or implies unfavorable treatment that places the people who suffer them at a particular disadvantage with respect to another in the work or professional context, as a result of having filed a Complaint or Information, resorted to external channels or made a public disclosure.

- "**Claims or Communications of a Contractual or Commercial Nature** ": those communications or complaints from (i) policyholders, insured parties or beneficiaries of insurance policies contracted with any Entity of the Group; (ii)

investors, participants and beneficiaries of individual pension plans and investment funds, managed, promoted or deposited in any Entity of the Group; (iii) third parties harmed by claims arising from insurance contracts signed with any Entity of the Group; or (iv) clients of insurance agents and bancassurance operators who provide their mediation services in private insurance for the Group's insurance companies; as well as the beneficiaries of any of them; against decisions adopted by the MAPFRE Group in the scope of the execution of the aforementioned contracts.

4 Purpose

This *Policy* establishes the fundamental principles that govern the operation of the MAPFRE Group's Internal Information System (hereinafter, " **MAPFRE** ") as the ideal and preferred channel for communicating information or complaints about possible irregularities or potentially illegal acts committed within it, contrary to the law or to the values and rules regulating the behavior of the MAPFRE Group contained in the *Code of Ethics and Conduct* and, in particular:

a) To reflect the commitment expressed by the MAPFRE Group to ensure that the actions of its members meet demanding standards of professionalism, integrity and a sense of responsibility.

   Integrity, understood as the requirement of ethical, transparent, and socially responsible conduct, is one of the core values of the MAPFRE Group and a central tenet of the behavior of all individuals who work in or for the MAPFRE Group (executives, employees, agents, and collaborators). Furthermore, it forms part of *the MAPFRE Group's Institutional and Business Principles* and the *Code of Ethics and Conduct* approved by the Company's Board of Directors, and is also reflected in, among other things, the corporate sustainability and compliance policies.

b) To specify and develop the institutional commitment of the MAPFRE Group to conduct all its activities and businesses in accordance with strict standards of ethical behavior and compliance with current legislation and the manifest rejection of any illegal or fraudulent practice that may occur within it, in any of the territories in which it operates.

   Implementing this commitment requires, among other things, strict compliance with the law and the obligations arising from it, as well as the establishment of specific mechanisms to allow anyone aware of irregular or illegal activities to report to the MAPFRE Group, even anonymously and with full guarantees of confidentiality and protection against retaliation, any acts or conduct within the MAPFRE Group that violate applicable general, internal, or sector-specific regulations. In this way, and after due verification of the reported irregularity or non-compliance, appropriate measures can be taken not only to remedy the consequences but also to prevent their recurrence.

MAPFRE, S.A.'s Internal Information System is established, designed, and managed to facilitate the reporting of complaints, information, findings, or news

regarding conduct within the company. Likewise, the Internal Information System may be used to submit inquiries or raise questions about the interpretation and/or application of the MAPFRE Group's *Code of Ethics and Conduct.*

The Internal Information System is not configured as a Customer Service and, therefore, Claims or Communications of a Commercial or Contractual Nature will not be processed through it, as they fall outside the scope of this *Policy* and are not subject to the protection provided for Complaints or Information, and will be processed through the Claims and Complaints Procedure established for this purpose.

5 Scope of application

This *Policy* applies to the Company and the other Entities of the Group, without prejudice to any adaptations that may be strictly necessary and that the latter may make to make it compatible and comply with any sector-specific rules or those derived from applicable legislation or the requirements of the supervisors in the countries in which they carry out their activity, as well as the establishment of the corresponding coordination measures for their adaptation to said rules and requirements.

In accordance with the principles set forth in this *Policy*, the Group Entities establish their respective Internal Information Systems, which integrate all channels available within each entity for submitting Complaints or Informations. These include all means, procedures, and structures established by each Entity to enable Informants to submit their Complaints or Informations. Notwithstanding the foregoing, certain Group Entities, considering their size, geographic scope, and the nature of their activities, may share their Internal Information Systems and the resources allocated to managing and processing Complaints or Information. In all cases, these systems will comply with the principles and criteria established in this *Policy.*

The Internal Information System is enabled to receive Complaints or Informations submitted by Informants in accordance with the principles established in this *Policy* and the Management Procedure. The Management Procedure may also be activated ex officio by the Compliance Officer of the Entity upon becoming aware of any indication of wrongdoing, whether through News or a Finding.

This *Policy* is complemented by the Information Management Procedure (the **"Management Procedure"**).

Each Internal Information System is subject to the Guiding Principles for the protection of the whistleblower contained in this *Policy* and has a person responsible for its management and a Procedure for the Management of Information received, which the different entities of the MAPFRE Group must develop and approve in their corresponding governing bodies, in accordance with the provisions of section 8 of this *Policy* .

Any internal communication channel available to the Group Entities for receiving information, or that may be created in the future for this purpose, must be integrated into the corresponding Entity's Internal Information System and, therefore, adapt to the principles established in this *Policy*.

In companies in which Group entities hold a stake but over which the Group does not have effective control, the implementation of principles and rules of conduct consistent with those established in this Policy shall be promoted as far as possible.

6 Guiding Principles of the Internal Information System

Without prejudice to the autonomy and independence of the Group Entities and the adaptations that may be necessary for compliance with the regulations applicable to each one, the Internal Information System of each Entity must at all times observe the following Guiding Principles:

a) **Zero tolerance principle:** the Internal Information System is configured as a manifestation of the zero-tolerance principle to irregular actions and rejection of any infringement or violation of current legislation or the values and ethical principles of the MAPFRE Group.

b) **Prohibition of Retaliation:** All forms of retaliation, direct or indirect, against Informants or any person included in section 9 of this *Policy are prohibited.* The governing bodies of the Group Entities will adopt the necessary and reasonable support and protection measures against all forms and attempts at retaliation.

c) **Principles of independence, objectivity, diligence and legality:** Complaints or Information received will be managed, processed and resolved with the utmost objectivity, impartiality and independence, establishing principles and rules of action to avoid the occurrence of possible conflicts of interest and prevent any person who may be involved in a possible conflict of interest (even potential) with the persons involved in the Complaint or Information from taking part in its management.

   The System Responsible will handle Complaints or Information with due diligence and respect for the Guiding Principles set out in this *Policy* and in applicable legislation.

d) **Principle of confidentiality:** confidentiality is configured as an essential principle that governs all actions that take place within the framework of the Internal Information System.

   The System is designed to be secure and includes appropriate technical and organizational measures to guarantee the confidentiality and privacy of all information, the identity of the informant, and any other person included in the complaint or report. All actions and investigations carried out in the management and processing of complaints or reports will also be

confidential. Access to this information will be restricted to those responsible for managing complaints or reports, preventing access by unauthorized personnel.

In the event that a complaint or information is received through any means or by a person other than the Responsible, absolute confidentiality must be maintained regarding the information received, which will be immediately forwarded to the Internal Information System Responsible. The MAPFRE Group will design and promote training and awareness initiatives to ensure that employees are aware of their obligation of confidentiality and of immediately forwarding any communication they may receive on this matter to the Responsible. Failure to comply may be considered a very serious offense.

Notwithstanding the foregoing, in no case may confidentiality be understood as an impediment or obstacle that restricts or conditions the possible disclosure of the reported facts to the competent authorities in accordance with applicable legislation.

e) **Rights of Affected Persons:** Within the Internal Information System, the presumption of innocence, honor, and image of Affected Persons will be respected, and their right to an impartial investigation of the facts and their right to defense will be guaranteed. This includes the right to be informed of the actions or omissions attributed to them, to be heard at the appropriate time and in the appropriate manner to ensure the successful completion of the investigation, and to have access to the file under the terms established in the Management Procedures. Affected Persons will enjoy the same protection established for Informants, preserving their identity and guaranteeing the confidentiality of all facts and data contained in the file.

f) **Anonymity:** Informants who wish to remain anonymous may do so to the extent permitted by local regulations in the country where the Complaint or Information is to be processed. In such cases, anonymous Complaints or Information will be processed respecting the safeguards established in this *Policy* and, in particular, without any tracking or action aimed at obtaining the Informant's identification or data.

g) **Good faith:** The Guiding Principles of this *Policy* will apply to Complaints or Information submitted to the Internal Information System in good faith and honesty. The Informant must have reasonable grounds to believe that the reported facts are true at the time of submitting the Complaint or Information.

h) **Publicity and accessibility:** This *Policy* is published on the Company's corporate website and internal portal, as well as through any other means deemed appropriate to ensure its broadest and most widespread awareness. Access to the Internal Information System will be public and easily usable and understandable for those wishing to file a complaint or request information.

7 System Responsible

The Internal Information System Responsible of each Entity (the "**Responsible**" or "**System Responsible**") may be a single person or a collegiate body.

The Company's Interna Information Systema responsible is the MAPFRE, S.A.'s Internal Information System Committee (the **"Committee"**), which will be composed of the following five (5) people, appointed by its Board of Directors:

- the Director of Legal Advice for the Securities Market and Corporate Governance, of the Corporate Area of the General Secretariat and Legal Affairs (who will assume the Presidency of the Committee).

- the Corporate Compliance Director (who will assume the Secretariat of the Committee).

- the Director of HR for Corporate Areas, of the Corporate Area of People and Organization.

- the Controller of the MAPFRE Group, from the Corporate Finance and Media Area.

- the Director of Governance, Risk and Security Compliance, of the Corporate Operations Transformation Area.

The appointment and dismissal of the members of the Committee must be notified to the competent authorities in accordance with the legally established terms, where applicable.

In the other entities, the designation of the System Responsible will be made by their respective governing bodies on the proposal of the Corporate Compliance Director with an equivalent composition, in the case of designating a collegiate body as such, to the Company Committee, considering the functions and professional competencies of its members, always adapted to the organizational structure of the Entity.

The Responsible will have the necessary material and personal resources for the proper performance of their duties, which they will carry out with full respect for the Guiding Principles of the Internal Information System contained in this *Policy,* with neutrality, honesty and objectivity towards all persons involved and independently and autonomously, without receiving instructions of any kind in the exercise of their duties.

Likewise, you may request the collaboration of other areas or have external collaborators who will support you in the analysis and investigation of the Complaints or Information depending on the nature of the reported facts.

In the case of Complaints or Information concerning events that could constitute conduct or an act of harassment in any of its forms, formulated within the scope

and application of the *Corporate Protocol for the Prevention and Treatment of Harassment,* the investigation of the file will be assigned to the investigating body referred to in the aforementioned protocol.

In case of Complaints or Information that deal with facts that could constitute internal fraud in the terms established in the *Corporate anti-fraud Policy*, the investigation of the file will be assigned to the Security Directorate of the Entity.

All employees and managers of the MAPFRE Group will cooperate at the request of the Responsible in clarifying the facts.

The Responsible will be responsible for creating and maintaining a record of all complaints or reports received, the resulting investigations, the resolution adopted, and any other information required by applicable regulations. Furthermore, the Responsible will take all necessary measures to guarantee the confidentiality and protection of all data included in said record.

The System Responsibles designated by the Entities will report to the Corporate Compliance Director, with the periodicity and through the procedure determined for this purpose, information on the number of Complaints or Information received within their area of responsibility and, of those that have been admitted for processing, information on the number , origin, type, result of the investigations and measures adopted, as well as any other information that may be established for the proper coordination and the best performance of their functions and in order to have full knowledge of the proper management of the Internal Information System at the corporate level, always within the limits established, where applicable, by the regulations that apply to them.

Likewise, if the Affected Person is a senior manager or a member of the governing body of any Entity of the Group or if the Complaint or Information gives rise to any relevant reputational risk for the MAPFRE Group, the System Responsible of said Company must inform the Corporate Compliance Director of the content of the Complaint or Information, its processing and its timely resolution.

8 Management Procedure

The Internal Information System will have an appropriate internal procedure for managing the Complaints or Information received, which will allow Informants to communicate their Information or submit their Complaints and will include, at least, the following aspects:

The channel or channels through which Complaints or Information may be received are either in writing (via the corresponding form located on the website or by any other established means), or verbally, or both, under the terms and conditions provided for in the applicable regulations and respecting and complying with the Guiding Principles established in this *Policy.* In cases where the applicable regulations so provide, the Information may also be communicated

through an in-person meeting within a reasonable timeframe under the terms established in said regulations.

a) The issuance to the Informant, if identified, of an acknowledgment of receipt of the Complaint or Information, within a specified period.

b) A maximum response or resolution period for Complaints or Information starting from the acknowledgment of receipt or, in the absence thereof, from the expiry after receipt of the Complaint or Information of the period determined for issuing the acknowledgment of receipt to the Informant.

c) Clear and easily accessible information on external channels for reporting to the competent authorities and, where applicable, to the institutions, bodies or organizations established for this purpose in the applicable regulations.

d) Likewise, the Management Procedure will contemplate the possibility of activating the Internal Information System ex officio, without prior Complaint, by decision of the Compliance Officer of the Entity, when he becomes aware of any Indication, whether through a Finding (even one that is known during the investigation of a Complaint or Information with which it is not related).

The governing body of each Entity will approve its respective Management Procedure taking as a reference the one approved by MAPFRE, S.A., making only the adaptations or modifications that, where appropriate, are strictly necessary to comply with local regulations, as well as the regulatory requirements or those of their respective supervisors that are applicable to each Entity.

9 Support and protection measures for the informant

The MAPFRE Group will adopt the necessary and reasonable support and protection measures 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 complaint or information is presented or against whom the Informant has acted in bad faith.

The informant protection measures will also apply, where appropriate, to:

a) The legal representatives of the workers in the exercise of their functions of advising and supporting the Informant.

b) Natural persons who assist the Informant within the framework of the organization in which he/she provides services.

c) Individuals related to the Informant who may suffer reprisals, such as co-workers or family members.

d) The legal entities for which the Informant works or with which he maintains any other relationship in a work context or in which he holds a significant stake.

The prohibition of retaliation will not prevent the adoption of disciplinary measures deemed appropriate when the investigation of the facts reported in the Complaint or Information determines that the Information is false or was formulated in bad faith by the Informant.

10 Internal Information System Governance Framework

In order to implement the principles set out in this *Policy,* the following Internal Information System Governance Framework is established:

a) **The Board of Directors of MAPFRE, S.A.** is responsible for establishing and implementing the Internal Information System within the Company. To this end, it approves this *Policy* and ensures the application of its Guiding Principles within the Company.

It also approves the corresponding Management Procedure of the Entity and is responsible for the appointment, dismissal or termination of the members of the Entity Committee.

b) **The governing bodies of each Group Entity** adopt this *Policy* (with any modifications or adaptations that may be strictly necessary, as indicated in section 5), approve their corresponding Management Procedures and appoint, dismiss or terminate the members of the body responsible for their respective Internal Information Systems.

c) **The committees or equivalent bodies of the Boards of Directors of the Group Entities, which may have been entrusted by the corresponding Board of Directors with functions related to the supervision of control and risk management systems, compliance monitoring, and/or the supervision of the process of preparing financial and non-financial information and internal auditing,** will be responsible for the general supervision of the operation of their Internal Information Systems for the purpose of evaluating the correct application of the aspects included in this *Policy* , in accordance with the provisions of the corresponding Board of Directors' Regulations or equivalent rule of the Entity in question.

To this end, they will receive annual information on the functioning of the Internal Information System of the corresponding Entity (number of Complaints or Information and, of those that have been admitted for processing, information on the number, their origin, type, the results of the investigations and measures adopted) and may propose improvement actions to minimize the risk of irregularities.

In any case and without prejudice to the foregoing, the Committees of the Boards of Directors of Group Entities with functions related to the supervision

of the process of preparing financial and non-financial information and internal audit will have direct access to Complaints or Information concerning irregularities of a financial, accounting or sustainability nature, which could have a material impact on the financial statements, on the non-financial information statements or on the internal control of the corresponding Entity, for which purpose they will receive individualized information from the Head of the Internal Information System, who will provide all relevant information or documentation.

The Audit Committee of MAPFRE, SA, will also have direct access to Complaints or Information with a material impact on the financial statements, on the non-financial information statements or on the internal control of any of the Group Entities or the Group as a whole.

d) **Responsible for the Internal Information System.** This person is responsible for the management of the Internal Information System in accordance with the terms and scope established in this *Policy* and in the corresponding Management Procedure.

Their appointment is made by the governing body of each of the Group Entities in accordance with the terms set out in this *Policy.*

He will be responsible for informing the Board of Directors, directly or through its corresponding commissions, in the cases mentioned in the previous point, on the relevant issues within the framework of the Internal Information System and may make proposals for improvement or establish action plans based on the results obtained and indicators achieved.

11 Personal data protection

The management of the Internal Information System will comply with the regulations on the protection of personal data that are applicable to the different Entities of the Group.

12 Training

The Corporate Compliance Directorate is responsible for coordinating regular communication and training activities on the operation of the Internal Information System and raising awareness to ensure proper understanding, application, and effective compliance with this *Policy*. It will also be responsible for resolving any queries received regarding the use and operation of the Internal Information System.

13 Supervision, dissemination and monitoring of this *Policy*

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

The Head of the Internal Information System, within the framework of his responsibilities and without prejudice to the supervisory powers that correspond to the Board of Directors of each Entity and, where appropriate, to its committees, may issue regulations for the development of this *Policy* and the corresponding Management Procedure (Guides, Regulations or Circulars) to ensure the correct functioning of the Internal Information System under his competence.

In order to achieve adequate dissemination, this *Policy* will be published in a separate and easily identifiable section of the MAPFRE corporate website homepage (www.mapfre.com) in which information will be provided in a clear and accessible way about the Internal Information System and its Management Procedure, as well as on the internal portal and/or any other means that may be considered appropriate to ensure its best and broadest knowledge.

If any of the Group Entities has its own website, this *Policy* will be included in a separate and easily identifiable section of its homepage (or a translation of this *Policy* into the corresponding local language) along with clear and accessible information about its respective Management Procedure. If any modification or adaptation of this *Policy is made* within the terms permitted in section 5, the Entity will publish the adapted *Policy* directly in a separate and easily identifiable section of its own website's homepage.

In Group Entities that do not have their own website, information about their Internal Information System and their Management Procedure will be provided through the internal portal and/or any other means that is considered appropriate to ensure the best and broadest knowledge, such as emails, newsletters or presentations.

Notwithstanding the foregoing, the management and governing bodies of the Group Entities are responsible for the dissemination and compliance with this *Policy* within their respective companies. To this end, they must adopt the necessary measures and, where applicable, report through the established channels any aspects that are not compliant or are only partially compliant.

14 Approval and entry into force of this *Policy*

This *policy* was initially approved by the Board of Directors of MAPFRE, S.A. on December 18, 2024, and last amended on December 22, 2025, repealing and replacing the previously valid version.