INFORMATION MANAGEMENT PROCEDURE

OF MAPFRE MIDDLESEA GROUP IN MALTA.

1. INTRODUCTION

This document contains the Information Management Procedure (the "Management Procedure" or the "Procedure") for Complaints submitted within the framework of the Internal Information System at MAPFRE Middlesea Group.

The purpose of the Procedure is to establish the necessary forecasts for the Internal Information System of MAPFRE Middlesea Group to comply with the Internal Information System Policy of MAPFRE, S.A. (the "Policy"), as well as the requirements contained in current regulations, including the assignment of responsibilities for those involved in their management for the proper and diligent processing of the Complaints or Information received.

2. DEFINITIONS

For the purposes of this Procedure, the following definitions apply:

- **Group Companies or Companies:** MAPFRE, S.A. and its subsidiaries and affiliates in accordance with the provisions of commercial legislation.

- **"MAPFRE Middlesea Group" (MMSG):** Shall include MAPFRE Middlesea plc and the following subsidiary companies:

    - MAPFRE MSV Life plc
    - BEE Insurance Management Limited
    - EuroMed Risk Solutions Limited
    - Church Wharf Properties Limited
    - Middlesea Assist Limited

- **Whistleblower** refers to the person submitting the complaint.

- **Complaint or Information:** Communication of possible irregular conduct or potentially illegal acts or acts that violate the law or internal regulations within the Group's Companies, including, in particular, any conduct that could constitute a crime, serious or very serious administrative violation, or violation of European Union law, among others, and any form of harassment.

- **Protected Disclosure:** with reference to the Internal Information System Policy and this Procedure, a protected disclosure is to be understood as a Complaint or Information , made as an internal disclosure or an external disclosure of information, and is made in writing or in any format which may be prescribed. A disclosed Complaint or Information is a protected disclosure if the whistleblower:

  (a) had reasonable grounds to believe that the information on breaches disclosed was true at the time of the disclosure and that such information fell within the scope of the Protection of the Whistleblower Act (Cap.257 of the Laws of Malta); and

  (b) disclosed internally in accordance with Section 6 of this Procedure, or externally in accordance with Section 14 of this Procedure, or made a public disclosure in accordance with Section 15 of this Procedure.

  Anonymously made disclosures shall not be a protected disclosure in terms of Article 11 of the Protection of the Whistleblower Act (Cap.257 of the Laws of Malta).

- **"Improper Practice" or "Breach(es)":** The acts or omissions as defined in Article 2 of the Protection of the Whistleblower Act (Cap.257 of the Laws of Malta), as provided under Annex A.

- **Informant:** Any person who has obtained or conveys the information stated in the Complaint, including employees, professionals, shareholders, participants, members of the governing, management, or supervisory bodies of the Group's Companies, as well as volunteers, interns, and trainees, service providers, clients, and any third party in the process of acquiring any of the aforementioned statuses or having lost it.

- **Affected Person:** The natural or legal person referred to in the Complaint for the purpose of attributing the referenced conduct or associating with the Information.

- **WBRO** refers to **Whistleblowing Reporting Officer**.

- **System Supervisory Body or Supervisor:** The body designated by the Group companies (MAPFRE S.A.) to manage its Internal Information System, with the functions and responsibilities indicated in Section 5 of the 'Internal Information System Policy of MAPFRE, S.A.'.

- **Internal Information System Committee, or Committee:** is the Supervisory Body of the Internal Information System designated by MMSG. Its composition is outlined in Annex B.

- **Retaliation:** Any action or omission prohibited by law, or that, directly or indirectly, causes or may cause unjustified harm or results in unfavourable treatment that places those who suffer from it at a particular disadvantage in comparison to others in the workplace or professional context, as a consequence of having filed a Complaint or provided Information, used external channels, or made a public disclosure.

- **Claims or Communications of a Contractual or Commercial nature:** Communications or grievances of (i) policyholders, insured parties, or beneficiaries of insurance policies taken out with MMSG; (ii) investors, participants, and beneficiaries of individual pension plans and mutual funds, managed, promoted, or deposited in MMSG; (iii) affected third parties due to claims arising from insurance contracts underwritten by MMSG, or (iv) customers of insurance agents and bancassurance operators who provide mediation services for the private insurance companies of the Group, as well as the rightful claimants of any of them, in relation to decisions made by MMSG in the context of the execution of the aforementioned contracts.

- **"detrimental action"** shall include :
  (a) action causing injury, loss or damage; and, or
  (b) victimisation, intimidation or harassment; and, or
  (c) occupational detriment; and, or
  (d) prosecution under article 101 of the Criminal Code relating to calumnious accusations and, or;
  (e) civil or criminal proceedings or disciplinary proceedings;

- **"good faith":** good faith in the case of a disclosure shall mean a disclosure made without a malicious purpose or personal gain

- **"occupational detriment":** means any direct or indirect act or omission which occurs in a work related context, which is prompted by internal or external disclosures or by public disclosure, and which causes or may cause unjustified detriment to the whistleblower and may include:

  (a) suspension, lay-off, dismissal or equivalent measures;
  (b) demotion or withholding of promotion;
  (c) transfer of duties, change of location of place of work, reduction in wages, change in working hours;
  (d) withholding of training;
  (e) a negative performance assessment or employment reference;
  (f) imposition or administering of any disciplinary measure, reprimand or other penalty, including a
  (g) financial penalty;
  (h) coercion, intimidation, harassment or ostracism;
  (i) discrimination, disadvantageous or unfair treatment;
  (j) failure to convert a temporary employment contract into a permanent one, where the worker had
  (k) legitimate expectations that he would be offered permanent employment;
  (l) failure to renew, or early termination of, a temporary employment contract;
  (m) harm, including to the person's reputation, particularly in social media, or financial loss, including loss
  (n) of business and loss of income;

(o) blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail
(p) that this person will not, in the future, find employment in the sector or industry;
(q) early termination or cancellation of a contract for goods or services;
(r) cancellation of a license or permit;
(s) psychiatric or medical referrals;
(t) being subjected to any disciplinary action including for breach of ethics or confidentiality;
(u) being subjected to a term or condition of employment or retirement which is altered or kept altered
(v) to his disadvantage provided that, this shall not apply where the action is taken where the direct or
(w) indirect act or omission is administratively or commercially justifiable for organizational reasons.

- **"reasonable grounds":** In establishing whether there are reasonable grounds , consideration shall be given to the following:
  (a) the seriousness of the alleged improper practice;
  (b) whether the improper practice is continuing or is likely to occur in the future;
  (c) whether the disclosure is made in breach of a duty of confidentiality owed by MMSG to any other person;
  (d) in the case whether an internal report has already been filed, any action which MMSG has taken or might reasonably be expected to have taken as a result of the previous disclosure; and
  (e) whether in making the disclosure to the authority, the employee complied with any procedure whose use by him was authorised by MMSG in accordance with MMSG's internal procedures.

- **"work-related context":** means current or past work activities in the public or private sector through which, irrespective of the nature of those activities, persons acquire information on improper practices and within which those persons may suffer retaliation if they reported such information.

Unless it appears otherwise from the context words importing the masculine gender shall include the feminine gender and vice-versa.

3. SCOPE OF APPLICATION

The procedure applies to MAPFRE Middlesea Group in Malta and concerns complaints (hereinafter, the "Complaints") in relation to "Improper Practice" or "Breach(es)".

4. SCOPE OF APPLICATION REGARDING PERSONNEL

Complaints submitted by all natural persons who have obtained information about the Breaches in the workplace or in a professional relationship with MAPFRE Middlesea Group in Malta shall be processed according to this procedure, including:

(i) Members of the Board of Directors,

(ii) employees whether full time or part time, volunteers, interns, trainees, and managers, even if the information communicated has been obtained within the scope of a labour or statutory relationship that has already ended or has not yet begun (in the latter case, if the information on the Breaches has been obtained during the pre-contractual selection or negotiation process),

(iii) self-employed persons, contractors, subcontractors and providers, and any person working for or under the supervision and direction of the same, and

(iv) shareholders, participants, and persons belonging to the administrative, management, or supervisory body of such companies

(hereinafter, the “Whistleblower” or “Whistleblowers”).

5. SUPERVISORY BODY OF THE INTERNAL INFORMATION SYSTEM

The Internal Information System Committee of MMSG is the Supervisory Body of the Internal Information System designated by MMSG (refer to Annex B). In this capacity, it acts as the collegiate body appointed by the Company's Board of Directors, tasked with its diligent management in accordance with the provisions set forth in this Procedure and within the scope established in the Policy.

The Committee delegates to the WBROs of MMSG, under the terms and scope established in this Procedure, the authority to manage the Internal Information System and to handle the investigation cases of Complaints or Information, including, among other tasks, their receipt and preliminary analysis, as well as maintaining the complaints register. WBROs are to perform their function independently and autonomously and shall have the personal and material means necessary to do so.

The operating system of the Internal Information System Committee will be regulated by its Terms of Reference approved for this purpose.

6. SUBMITTING COMPLAINTS OR INFORMATION

Complaints shall be processed in line with the following procedure:

I. The Internal Complaints System covered by this Procedure is the internal channel established for the purposes of the Protection of the Whistleblower Act (Cap.257 of the Laws of Malta)

II. Without prejudice to the Internal Complaints System, the Independent Authority for the Protection of Whistleblowers provided for in the Protection of the Whistleblower Act (Cap.257 of the Laws of Malta) - as set out Annex D of this procedure - the corresponding regional authorities or bodies with competence in this area, or other external channels established by sector and, where appropriate, the institutions, bodies or agencies established in the European Union, may be contacted to report Breaches.

Informants included in any of the groups indicated in the subjective scope of application of the Policy and on the matters indicated in their objective scope have access to the Channels I and II above.

The Informant ("whistleblower") who becomes aware of any real or suspected improper practice, and provided that he does not have any vested or personal interest therein, may submit a complaint in accordance with the following:

I. Complaints may be made in writing, verbally, or both.

II. Complaints may be submitted to the respective Whistleblowing Reporting Officer (WBRO) at the following dedicated email addresses:

   - For MAPFRE MSV Life plc at whistleblower@msvlife.com;
   - For MAPFRE Middlesea plc and the remaining subsidiary companies at whistleblower@middlesea.com;

   or by hand directly to the respective WBRO. The WBRO shall be the person appointed from time to time by MMSG as indicated in Annex D and E respectively.

III. MMSG recommends that persons in scope use the template "Complaint Form" attached as Annex C to this procedure

IV. If the whistleblower reasonably believes that the WBRO is or may be involved in the alleged improper practice; or where the WBRO is by reasons of any relationship or association with a person who is or may be involved in the alleged improper practice, not a person to whom it is appropriate to make the disclosure, the whistleblower may make a disclosure directly to the Chairman of the Board of Directors of the relative Company or to the President & CEO/ CEO/General Manager, as applicable, of the said Company, and the Complaint is then raised to the attention of the Internal Information System Committee, in the manner deemed appropriate in the circumstances.

Acknowledgement of receipt of the Complaint is to be provided within 7 days, with feedback on the Complaint to be provided within 3 months from the acknowledgement of receipt.

Complaints which are submitted verbally, may also be submitted through an in-person meeting at the Informant's request, which must be made through one of the previously mentioned Channels.

Once the request has been made, the in-person meeting will take place within a maximum of seven (7) calendar days. With the prior consent of the Informant, verbal Complaints may be recorded and, in any case, will be documented through a complete and accurate transcription of the conversation. The Informant will then be given the opportunity to review, correct, and approve the transcription by signing it.

7. PROCESSING AND CONFIDENTIALITY OF COMPLAINT

Processing of submitted Complaints has to be done in line with Article 6 (1) of the Protection of the Whistleblower Act (Cap.257 of the Laws of Malta), which states that "Every whistleblowing reporting officer... to whom a protected disclosure is made or referred must not disclose information that identifies or may lead to the identification of the whistleblower unless the whistleblower expressly consents in writing to the disclosure of that information."

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 WBROs. 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 respective appointed WBROs, as to guarantee the confidentiality of the Information at all times.

8. RECEIPT, ADMISSION, AND REGISTER OF COMPLAINTS

Upon receipt of the Complaint through any of the indicated Channels set out in Section 6 of this Procedure, the WBRO 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 compromise the confidentiality of the communication or the Informant has waived the right to receive information about their Complaint. Likewise, the WBRO will analyse and evaluate the Complaint in advance and will agree to its rejection for processing in the following cases:

(i) When the content of the Complaint refers to conduct, facts, or information not included within the scope of application of the Policy.

Claims or Communications of a Commercial or Contractual nature will be sent for processing through the procedures established for this purpose, and the Informant will be informed accordingly.

(ii) When the facts are described generically or imprecisely and make it impossible to investigate the alleged irregularities reported.

Before rejecting the Complaint on these grounds, the WBRO will request the Informant, when the Complaint has not been anonymous, to clarify and specify the facts mentioned. If the deficiencies are not corrected, they will be rejected, without prejudice to the subsequent initiation of an investigation, if additional information is received in accordance with the provisions of the Policy.

(iii) When the information received is not plausible, can be viewed as manifestly unfounded and unaccredited events, or is based on mere rumours lacking credit.

(iv) When the Complaint 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 Internal Information System Committee will also be informed of the Complaint so that, where appropriate, it can take the appropriate legal measures.

(vi) When the information is related to claims about interpersonal conflicts or that only affect the Informant and the individuals mentioned in the Complaint, unless it concerns behaviours that could potentially constitute harassment.

(vii) When the Complaint refers to events or situations that have also been reported through an external channel or are being investigated at the administrative headquarters or by the Courts of Justice.

If the Complaint is rejected for any of the aforementioned reasons for inadmissibility, the WBRO will close the case, providing a reasoned record of this decision in the Complaints Register, and will notify the Informant of the decision, using the contact details they have provided, unless the Informant has waived the right to receive communications about the Complaint.

The protection conferred to the Whistleblower may not apply (Complaint will not be treated as a Protected Disclosure) if it is reasonably determined that a complaint was made maliciously or recklessly, or where an employee knowingly discloses information he knows or ought to reasonably know is false. Furthermore, any processing of personal data carried out within the context of a whistleblowing report by the WBRO and / or MMSG shall be carried out in line with, and shall be subject to, the provisions of the general law regulating data protection as may be in force from time to time.

Provided that any personal data which is manifestly not relevant for the handling of a specific report shall not be collected by the WBRO and / or MMSG and shall be deleted without delay if accidentally collected.

If, after analysing the Complaint, the WBRO determines that none of the reasons for inadmissibility outlined in sections (i) to (vii) above apply, they will forward it to the Internal Information System Committee of MMSG. The Committee will analyse whether there are reasonable indications of the alleged existence of an irregularity or violation within the scope of this Procedure. Based on this analysis, it will decide on the admission or rejection of the Complaint for processing and, if applicable, initiate the corresponding investigation case and appoint its Case Investigator (the "Investigator"). The Informant will also be informed of the agreement to accept or reject the process provided for in the previous section.

The Case Investigator may be a person of the Company or an external collaborator, at the discretion of the Committee, depending on the nature of the facts reported. The Investigator may request collaboration from other departments or engage external collaborators at any time 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 subject to the confidentiality obligations established in the Policy, and the Procedure.

In the case of Complaints concerning acts or behaviours that may constitute harassment in any of its forms, submitted within the scope and framework of the Corporate Protocol for the Prevention and Handling of Harassment, the investigation of the case will be assigned to the Human Resources Function. In turn, for Complaints 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 Anti-Financial Crime Department, specifically to the Chief Officer of the Anti-Financial Crime Department, which will conduct the investigative procedures in accordance with the provisions of said Policy.

The Committee will decide to suspend the processing of a case when it becomes aware of the use of external channels (as provided in Annex D) or the initiation of administrative or, where applicable, judicial procedures regarding the same facts covered by the Complaint, and it will suspend processing until those procedures are concluded. This is without prejudice to providing the requested information and necessary support to the relevant authorities.

Likewise, when the Complaints received, the evidence provided, and/or the verifications and investigations carried out show reasonable evidence that the facts may constitute a crime and also where the financial interests of the European Union are affected , the Committee will agree to send the information on them to the respective local authorities. The Committee will likewise inform Corporate General Counsel Area.

The respective WBROs will be responsible for maintaining and updating the Complaints Register, through a logbook in which the received Complaints will be recorded, along with the management and processing conducted, any internal investigations that may have been initiated as a result, and the final Resolution adopted regarding them. The WBROs will utilise same format and structure for the Complaints Register.

The WBRO will adopt the necessary measures to guarantee the confidentiality and protection of all data included in the Complaints Register.

Complaints processed in accordance with the Corporate Protocol for the Prevention and Handling of Harassment, as well as their Resolutions by the Internal Information System Committee, will be included in a specific section of the logbook, under the custody and responsibility of the WBRO.

In the event that the communication received consists of a consultation on the interpretation and/or application of the MAPFRE Code of Ethics and Conduct, the WBRO, after asking the Group Head of Compliance Office, will send the Informant the relevant response as soon as possible.

9. INVESTIGATION OF THE FACTS REPORTED

Once the Complaint has been accepted for processing, the Committee may agree to conduct internal or external investigations to clarify the facts reported.

The Investigator appointed by the Committee will be responsible for coordinating and driving the investigation process, performing or requesting that any actions they deem appropriate be carried out, requesting the necessary help and resources, and collecting any information and documentation they deem appropriate in order to verify the accuracy and truthfulness of the information received. It may also maintain communications with the Informant through the respective WBRO, and request any additional information it deems appropriate for the purpose of the investigation.

Based on the content of the Complaint, 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 ascribed to them. They will also be granted the opportunity to present their case at any time, in a manner and timeframe deemed appropriate to ensure a fair and effective investigation process.

In accordance with the provisions of the Policy, during the processing of the case, all rights of the Affected Persons will be respected, such as the right to the presumption of innocence, the right to honour, the right to an impartial investigation of the facts, the right of defence and to use the evidence it deems appropriate and relevant, and the right to have access to the case file, in the terms established by law. Access to the case file will be understood as the right to know the facts attributed to them, without disclosing information that could identify the Informant or jeopardize the outcome of the investigation. They will also enjoy the same protection established for

Informants, preserving their identity and guaranteeing the confidentiality of all the facts and data contained in the case file.

Notwithstanding the above, the Affected Persons will not, under any circumstances, be informed of the identity of the Informant, nor will they have access to the original Complaint or any other information that could reveal the Informant's identity.

Once the relevant evidence has been examined and the investigation concluded, the Case Investigator will prepare a report outlining the facts of the complaint, the actions undertaken to verify their accuracy, and the conclusions drawn during the investigation (the "Report"), which will be submitted to the Internal Information System Committee of MMSG.

10. RESOLUTION OF COMPLAINTS

Based on the elements, data, investigations, and conclusions presented in the Case Investigator's Report, the Internal Information System Committee of MMSG will make a determination, through a written resolution (the "Resolution"), as to whether the facts described in the Complaint could constitute any type of violation or irregularity. If applicable, the Committee will specify the necessary actions to be taken in each case, which may include:

(i) The conclusion of the case and the filing of the Complaint will occur if the Resolution determines that the reported irregularity, unlawfulness, or violation has not been substantiated or that the responsibility of the Affected Person has not been verified.

(ii) The transfer of the Resolution to:

(a) The Human Resources Department, when the Resolution concludes that the irregularity or unlawful act that took place can be attributed to an employee or executive of the Company. This Area will then decide on the appropriate disciplinary, corrective, and/or preventive measures to be taken, in accordance with applicable labour legislation. The adoption and content of such measures will be communicated to the WBRO, who will then inform the Committee.

Additionally, in the case of Complaints related to facts that could constitute harassment behaviour or acts in any of its forms, made within the scope and applicability of the Corporate Protocol for the Prevention and Treatment of Harassment, the Resolution will, in all cases, be transferred to the Human Resources Department, specifically to the Chief Officer of the Human Resources Department, who is also a member of the Internal Information System Committee, for the purpose of complying with the reporting obligations established in current legislation. When the legal representation of workers has been involved in the investigation procedure at the request of any of the parties involved, the Resolution will also be sent to them. Additionally, the Resolution will be forwarded to:

(b) The Remuneration Committee, through its secretary, when the Resolution concludes that a member of the Company's Board of Directors has committed an irregularity, unlawful act, or violation of the law, for the adoption of the corresponding measures. The adoption and content of these measures will be communicated to the WBRO, who will inform the Committee accordingly.

(c) Any other Corporate Area or Company department that may be appropriate based on the facts and conclusions of the Resolution for the adoption of any other measures that are deemed appropriate and whose adoption and content will inform the WBRO, who will then forward it to the Committee.

In reiteration of what was noted under Section 8, when the Complaints received, the evidence provided, and/or the verifications and investigations carried out show reasonable evidence that the facts may constitute a crime and also where the financial interests of the European Union are affected, the Committee will agree to send the information on them to the respective local authorities. The Committee will likewise inform Corporate General Counsel Area.

The Resolution must be issued and communicated to the Informant, who has been identified and provided with an address, email, or secure location for receiving notifications, unless they have waived the right to receive information about their Complaint. It must also be communicated to the Affected Persons as soon as possible, and in any case, before the expiration of three (3) months from the date the Complaint was received. If no initial acknowledgment of receipt has been sent, the maximum period for issuing the Resolution will be three (3) months and seven (7) calendar days from its receipt.

However, for cases involving events or circumstances in which special complexity arises, at the discretion of the Internal Information System Committee, the aforementioned period may be extended to a maximum of three (3) additional months.

11. GUARANTEE OF PROTECTION

MMSG undertakes that a whistleblower who reports, in accordance with this procedure, an improper practice in good faith, shall not be subjected to victimisation, harassment, disciplinary proceedings or occupational detriment of any kind whether by direct or indirect act or omission in the work-related context.

Any person within MMSG, including executives and senior management, who intimidates (through the use of physical or psychological violence or threats) retaliates or subjects the whistleblower to detrimental action, will be subject to disciplinary action which may include dismissal.

In the event that the whistleblower believes that as a result of his complaint he is being made subject to detrimental action by any person within MMSG, he is to immediately inform the respective WBRO. Upon receiving the report, the WBRO shall forward the Complaint to the Internal Information System Committee, who shall then conduct a preliminary investigation and if it results that prima facie there exists reasonable grounds to justify the report of the whistleblower, the WBRO shall immediately submit a written report to the Chairman of the Board of Directors of the relative Company and/or the President & CEO/CEO/General Manager, as applicable, of the said Company, and request guidance as to how to handle the matter to ensure that appropriate action be taken to protect the whistleblower from any detrimental action.

Provided that in the event that in order to protect the whistleblower from detrimental action, it is necessary to disclose his identity, then the WBRO shall request the consent of the whistleblower prior to disclosing his identity.

A whistleblower who makes a complaint in accordance with this procedure shall not be liable to any civil or criminal proceedings. However, should it result in following up with the complaint that the whistleblower was the perpetrator or an accomplice in the disclosed improper practice, the whistleblower shall not be exempt from the institution of disciplinary proceedings and/or civil or criminal proceedings.

12. 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 be adapted to the principles of legality, limitation of purpose, minimization of data, accuracy, limitation of conservation period, and confidentiality established in said regulations.

13. INFORMATION TO GOVERNING BODIES

Every year, the Internal Information System Committee will send the Risk and Compliance Committee information on the functioning of the Internal Information System, which will include at least the number of complaints received, their origin and type, the results of the investigations, and the resolutions adopted.

Notwithstanding the above, the Internal Information System Committee will provide individualized information regarding Complaints or Information related to financial, accounting irregularities, or issues linked to sustainability, which could have a material impact on the financial statements or internal control of MMSG to the Audit Committee.

14. EXTERNAL REMEDIES AND DISCLOSURES

A whistleblower shall be legally entitled to make an external complaint to a Whistleblowing Reports Unit of an Authority (as provided in Annex D attached to this policy) if the whistleblower believes on reasonable grounds that:

- the Competent body at MMSG is or may be involved in the improper practice alleged in the complaint; or
- that immediate reference to the authority, is justified by the urgency of the matter to which the complaint relates, or some other exceptional circumstances; or
- at the time the whistleblower makes the external complaint, that he will be subjected to an occupational detriment by MMSG if he makes a complaint to the WBRO; or
- that it is likely that evidence relating to the improper practice will be concealed or destroyed if the employee makes a complaint to the WBRO; or
- that although a complaint has previously been made to the WBRO, the whistleblower has not been informed on the status of the complaint or it is reasonably evident to the whistleblower that there has been no action or recommended action on the matter to which the complaint relates within a reasonable time from the making of the complaint.

15. PUBLIC DISCLOSURES

A public disclosure shall be considered a protected disclosure under the Protection of the Whistleblower Act (Cap.257 of the Laws of Malta) if any one (1) of the following conditions are fulfilled:

The whistleblower has reasonable grounds to believe that:

(a) the breach may constitute an imminent or manifest danger to the public interest, such as when there is an emergency situation or a risk of irreversible damage; or

(b) in the case of external reporting, there is a risk of retaliation or there is a low prospect of the breach being effectively addressed, due to the particular circumstances of the case, such as those where evidence may be concealed or destroyed or where an authority may be in collusion with the perpetrator of the breach or involved in the breach.

16. DISSEMINATION

In order to achieve proper dissemination, the Internal Information System Policy of MAPFRE, S.A. (the "Policy"), will be published in a separate and easily identifiable section of the website home page (), in which information on the Internal Information System and its Management Procedure will be provided in a clear and accessible manner, as well as on the internal portal and/or any other means deemed appropriate to guarantee its best and broadest knowledge.

17. TRAINING

The Compliance Office is responsible for promoting periodic communication actions, training on the functioning of the Internal Information System, and raising awareness to ensure proper understanding and compliance with the Internal Information System Policy of MMSG, and this Procedure. To this end, its actions will be coordinated with the Areas responsible for training and internal communication.

Therefore, employees shall be trained on the Internal Complaints System so that they understand their obligation of confidentiality and immediate referral to the WBRO of any related communication received, understanding that non-compliance with or breach of these obligations could be considered a serious offence.

18. APPROVAL, ENTRY INTO FORCE, AND REVIEWS

This Procedure has been approved by the respective Board of Directors, on XXX, the date as of which it takes effect, revoking and replacing the previous one.

The Compliance Office will regularly review the content of this Procedure to ensure that its provisions remain valid and are duly updated and will propose any modifications to the Board of Directors of the companies within MMSG , where appropriate.

Annex A – Definition of "Improper Practice"

"improper practice" means an action or a series of actions whereby:

(a) a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject; or

(b) the health or safety of any individual has been, is being or is likely to be endangered; or

(c) the environment has been, is being or is likely to be damaged; or

(d) a corrupt practice has occurred or is likely to occur or to have occurred; or

(e) a criminal offence has been committed, is being committed or is likely to be committed; or

(f) a miscarriage of justice has occurred, is occurring or is likely to occur; or

(g) bribery has occurred or is likely to occur or to have occurred; or

(h) a person has failed, is failing or is likely to fail to comply with any legal obligation on public procurement to which he is subject; or

(i) a person has failed, is failing or is likely to fail to comply with laws on financial services, products and markets, and prevention of money laundering and terrorist financing; or

(j) a person has failed, is failing or is likely to fail to comply with product safety and compliance law; or

(k) a person has failed, is failing or is likely to fail in ensuring transport safety; or

(l) a person has failed, is failing or is likely to fail in ensuring radiation protection and nuclear safety; or

(m) a person has failed, is failing or likely to fail in ensuring a food and feed safety, animal health and welfare; or

(n) a person has failed, is failing or is likely to fail to comply with any legal obligation on consumer protection to which he is subject; or

(o) a person has failed, is failing or is likely to fail to comply with any legal obligation on protection of privacy and personal data, and security of network and information systems to which he is subject; or

(p) a breach affecting the financial interests of the European Union as referred to in Article 325 of the Treaty on the Functioning of the European Union (TFEU) and further specified in relevant European Union measures has occurred or is likely to occur or to have occurred; or

(q) a breach relating to the internal market, as referred to in Article 26(2) of the Treaty on the Functioning of the European Union (TFEU), including breaches of European Union competition and State aid rules, as well as breaches relating to the internal market in relation to acts which breach the rules of corporate taxor to arrangements the purpose of which is to obtain a tax advantage that defeats the object or purpose of the applicable corporate tax law has occurred or is likely to occur or to have occurred; or

(r) information tending to show any matter falling within any one (1) of the preceding paragraphs has been, is being or is likely to be deliberately concealed:

Provided that, in the interpretation of this definition due account shall be given to the de minimis rule so that very minor or trivial matters shall not fall under the provisions of this Act;

Annex B- Composition of the Internal Information System Committee

The Internal Information System Committee is comprised of the following persons appointed by the Company's Board of Directors:

- Chief Legal Officer for MAPFRE Middlesea p.l.c. and WBRO for MAPFRE Middlesea p.l.c, BEE Insurance Management Limited, EuroMed Risk Solutions Limited, Middlesea Assist Ltd. and Church Wharf Properties Limited (who will be the Chair of the Committee),

- Chief Compliance Officer for MAPFRE Middlesea p.l.c. and MAPFRE MSV Life p.l.c. and WBRO for MAPFRE MSV Life p.l.c. (who will be the Secretary of the Committee),

- Chief Officer for Human Resources for MAPFRE Middlesea p.l.c. and MAPFRE MSV Life p.l.c.

- Chief Financial Officer for MAPFRE Middlesea p.l.c.

Annex C - Complaint Template

General Instructions: Persons in scope who are reporting an alleged improper practice are to complete the form below, and return it by email to the email address provided in Section 6 of this procedure or by hand to the WBRO.

Whistleblowing Report	
Date of Complaint:	
Details of Whistleblower	
Complete this section if you do not wish to remain anonymous. *Do not complete this section if you wish to remain anonymous.* *If this section is left blank, your disclosure will be treated as an anonymous submission and will not be considered a protected disclosure.*	
Name:	
ID/Passport Number:	
Contact Number:-	
Email:	
Designation within the Entity, if applicable:	
Details of Complaint	
Kindly provide details of the Complaint in question.	
Description of Alleged Improper Practice	
Date of occurrence	
Place of occurrence	

How it occurred	
How it came to your knowledge *(applicable if the Complaint does not personally involve you)*	
Names of persons responsible for the improper practice	
Names of any other persons in possession of relevant information	
Persons with whom improper practice was discussed	
Estimate of value of financial loss/es involved	

☐ **I hereby authorise the disclosure of my identity if the Whistleblowing Reporting Officer reasonably believes it is necessary or appropriate.**	____________________ Complainant

Attachments

Kindly provide any supporting evidence for the allegations.

Annex D

External Complaints are to be made to the following authorities in accordance with the nature of the improper practice.

Authority	Description of Matters
Auditor General	Failure to observe laws, rules and regulations relating to public finance and misuse of public resources
Commissioner for Revenue	Income tax, corporate tax, capital gains tax, stamp duties, national insurance contributions, value added tax or "revenue acts" as defined in the Commissioner for Revenue Act
Commissioner for Voluntary Organisations	Activities of a voluntary organisation
Financial Intelligence Analysis Unit	Money Laundering or financing of terrorism in terms of the Prevention of Money Laundering Act
Malta Financial Services Authority	The business of credit and financial institutions, the business of insurance and the activities of insurance intermediaries, the provision of investment services and collective investment schemes, pensions and retirement funds, regulated markets, central securities depositors, the carrying out of trustee business either in a professional or a personal capacity and such other areas of activity or services as may be placed from time to time under the supervisory and regulatory competence of the Malta Financial Services Authority.
Ombudsman	i) Conduct involving substantial risk to public health or safety or the environment that would if proved, constitute a criminal offence; and ii) All matters which constitute improper practices and which are not designated to be reported to any other authority
Permanent Commission Against Corruption	Corrupt practices

Annex E

The Whistleblowing Reporting Officer (WBRO) of MAPFRE Middlesea p.l.c, BEE Insurance Management Limited, EuroMed Risk Solutions Limited, Middlesea Assist Ltd. and Church Wharf Properties Limited is :-

Chief Legal Officer and Company Secretary

as appointed by the Board of Directors of the parent company MAPFRE Middlesea plc from the 26 October 2018.

Annex F

The Whistleblowing Reporting Officer (WBRO) of MAPFRE MSV Life p.l.c is :-

Chief Compliance Officer

as appointed by the Board of Directors of MAPFRE MSV Life plc from the 16 October 2014.