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EXTRACT FROM Mapfre Re, Compañía de Reaseguros, S.A.
CRIMINAL PREVENTION MODEL

1 Introduction

The *Criminal Prevention Model of Mapfre Re, Compañía de Reaseguros, S.A.* ("**Mapfre Re**" or the "**Entity**") is the basis of the criminal risk prevention system adopted by the Entity and details the design and structure of the system implemented to prevent the commission of crimes within it (the "**Model**" or the "**Prevention Model**").

The *Model* demonstrates the commitment to the ethical-business culture of the Entity and its managers, highlighting the firm commitment to good governance and due diligence for the proper management and prevention of criminal risks that may arise from bad practices or regulatory non-compliance in the development of its activities, with special focus on those regulatory aspects with criminal implications, in order to prevent and mitigate the commission of crimes in the Entity.

This document describes the Entity's guidelines for exercising due diligence and monitoring over its business activities, indicating the criminal risks to which it is exposed, and establishing guidelines for managing and evaluating the controls implemented to mitigate crimes within its scope.

This document has been prepared on the basis of the *Criminal Prevention Model* approved by Mapfre, S.A., which constitutes the general framework of reference for all entities of the Mapfre Group (hereinafter, the "**Group**" or "**Mapfre Group**").

As established in the *Mapfre Group's Policy on the organizational bases and principles*, the Group has a decentralized corporate structure, upon which a principled governance model is based, clearly defining the functions of Mapfre, S.A. in relation to the other Group entities. Furthermore, the Group has a business structure subject to a rigorous system of control and supervision at all levels—local, regional, and global—which allows for broad delegation in the execution and development of the responsibilities assigned to the teams and their managers.

This approach ensures the effective application of the principle of decentralization in the strategic direction and management of businesses.

Within the context of this decentralized structure - and in firm application and development of the principle of zero tolerance towards possible criminal offenses, and in order to promote an ethical and responsible business culture in the companies of the Mapfre Group - each entity of the Group is responsible and must approve and implement its own *Prevention Model* in accordance with the criteria established in the *Model* approved by Mapfre, S.A., without prejudice to its adaptation to the regulations that may apply to them.



Consequently, the Board of Directors of Mapfre Re, as the competent body to approve the *Criminal Prevention Model*, in accordance with the *Regulations of the Board of Directors of Mapfre Re and the Compliance Policy*, has approved this *Criminal Prevention Model*, which is a compliance program that aims to describe the foundations of an organizational and management model that includes the principles that underpin the actions of the Entity with the objective of preventing potential criminal liabilities.

2 Qualification

In accordance with the classification set out in the *Corporate policy on the development and organization of the rules that make up the corporate governance system of the Mapfre Group*, this document is a general companywide procedure that develops the provisions of the *Compliance Policy* approved by the Board of Directors of the Entity.

3 Purpose

The *Prevention Model* aims to:

- a) Establish a structured and organized system of prevention and control aimed at reducing the risk of committing crimes.
- b) To make the *Prevention Model known* to all personnel included within its scope of application, in relation to:
 - a. The importance of regulatory compliance and the ethical principles contained in the Entity's internal regulations in the performance of its functions.
 - b. The obligation to comply with the *Prevention Model* approved by the Entity.
- c) To define the necessary guidelines to adapt control measures, in order to more effectively prevent the commission of criminal offenses.

4 Scope of application

This *Prevention Model* applies to the Entity, its directors, managers, and employees, as well as its legal representatives and other persons subject to the authority or instructions of the aforementioned persons or who operate within their sphere of management, supervision, oversight, or control. It also includes those groups acting in the name, on behalf of, or in any way in the interest of the Entity, provided they act in accordance with the Entity's instructions.



5 Criminal liability regime for legal entities

5.1 Crimes that a legal entity can commit

The criminal liability of legal entities was introduced into the Spanish Penal Code by *Organic Law 5/2010, of June 22, which modifies Organic Law 10/1995, of November 23, of the Penal Code*, which came into force on December 23, 2010.

Subsequently, on July 1, 2015, *Organic Law 1/2015, of March 30, came into force, which modifies Organic Law 10/1995, of November 23, of the Penal Code*, regulating the guidelines that must be followed by entities to be exonerated from criminal liability for having properly exercised their duties of supervision and control.

Article 31 bis of the *Penal Code* establishes that criminal liability may be attributed to legal entities:

- a) Of the crimes committed in the name or on behalf of the same, and for their direct or indirect benefit, by their legal representatives or by those who, acting individually or as members of a body of the legal entity, are authorized to make decisions on behalf of the legal entity or hold powers of organization and control within it.
- b) Of the crimes committed, in the exercise of social activities and on behalf of and for the direct or indirect benefit of the same, by those who, being subject to the authority of the natural persons mentioned in the previous paragraph, have been able to carry out the acts because of the serious breach by them of the duties of supervision, monitoring and control of their activity given the specific circumstances of the case.

The Entity is clearly committed to preventing the commission of crimes within its organization. To this end, the Entity conducts a thorough analysis of its operations and activities to identify the criminal risks to which it is exposed, defines which criminal conduct may give rise to liability, identifies the areas where the identified crimes may materialize, and reviews the procedures implemented to prevent, mitigate, or avoid the risk of committing such conduct, in accordance with the *Compliance Policy*.

5.2 Penalties or accessory consequences applicable to legal entities

The penalties or accessory consequences that may be imposed on legal entities in accordance with *articles 33.7 and 129 of the Penal Code* are:

- a) Fine by quotas or proportional.
- b) Dissolution of the legal entity.



- c) Suspension of its activities for a period that may not exceed five years.
- d) Closure of their premises and establishments for a period that may not exceed five years.
- e) Prohibition from carrying out in the future the activities in the exercise of which the crime was committed, facilitated or concealed.
- f) Disqualification from obtaining public subsidies and aid, from contracting with the public sector and from enjoying tax or social security benefits and incentives, for a period that may not exceed fifteen years.
- g) Judicial intervention to safeguard the rights of workers or creditors for the time deemed necessary, which may not exceed five years.

5.3 Exemption from criminal liability.

For the crimes that may generate criminal liability of the legal entity, referred to in the *Catalogue, Article 31 bis of the Penal Code* establishes, as a cause of exemption from criminal liability, the fact that there is a prevention model that allows avoiding or significantly reducing the risk of committing crimes.

For this model to be considered effective, it must meet the following requirements:

- i) Identify the activities within which the crimes that need to be prevented may be committed.
- ii) Establish the protocols or procedures that specify the process of forming the will of the legal entity, adopting decisions and executing them in relation to those.
- iii) Having adequate financial resource management models in place to prevent the commission of crimes that need to be prevented.
- iv) Impose the obligation to report possible risks and non-compliance to the body responsible for monitoring the operation and compliance of the prevention model.
- v) Establish a disciplinary system that adequately sanctions non-compliance with the measures established by the model.
- vi) Perform a periodic review of the model and its possible modification in case of relevant infringements, changes in the organization, in the control structure or in the activity carried out.

Accordingly, if any of the aforementioned crimes are committed and it is proven that the Entity had a suitable model in place and applied it effectively, it will be



exempt from criminal liability. If the model is not entirely satisfactory or has not been applied with the appropriate level of rigor, the exemption will not be complete, but liability may be mitigated.

6 General prevention tools

The Entity has robust procedures in place for identifying, managing, controlling, and communicating the risks to which it may be exposed, as well as appropriate internal control mechanisms, including reliable administrative and accounting procedures. It also has a corporate governance system that forms the basis for the integrated control system within the *Prevention Model*.

The Entity has, among others, the following prevention tools:

- Internal regulations: In accordance with the *Policy on the development and organization of the rules that make up the corporate governance system of the Mapfre Group*, the following types of rules exist:
- “Policies” establish principles, objectives and guidelines for action of a general nature in a specific subject or sector of activity.
- The “Regulations Governing the Operation of Governing Bodies” outline the responsibilities and powers assigned to each body.
- The “General Procedures” develop what is established in the Policies and the Regulations Governing the Operation of the Governing Bodies, including specific guidelines for action.
- The “Organizational Documents of an Area, Directorate or Function” describe and systematize the activities and processes specific to an area, directorate or function. They can take the form of manuals or protocols.
- Corporate governance system: Ensures proper management and control, with broad participation of board members and executives in decisionmaking. This management model promotes the delegation of functions and responsibilities, ensuring that the most important decisions, at all levels, are rigorously analyzed by the corresponding management teams, both before and after their implementation.

6.1 Internal regulations

- ***Institutional and Business Principles of the Mapfre Group*** (“***Institutional Principles***”). Approved by the Board of Directors of Mapfre, S.A. They constitute the minimum framework of mandatory compliance for all entities of the Group and their respective governing bodies, which must adapt their



internal regulations and their actions to the principles and rules defined therein.

- **Mapfre Re's Bylaws**, which, among other aspects, regulate the decisionmaking processes of the statutory governing bodies and establish rules relating to the control and supervision of the Entity's activities and operations.
- **Mapfre Re's Board of Directors' Regulations** govern the operation of its Board of Directors and other statutory bodies. According to these regulations, the Board of Directors is responsible for ensuring that the corporate culture is aligned with the *Institutional Principles*.
- **Code of Ethics and Conduct**. It is inspired by the *Institutional Principles* and aims to reflect the corporate values and basic principles that should guide the actions of the Mapfre Group and the people who make it up.
- **Corporate policy on the Internal Information System**, which establishes the fundamental principles that govern the operation of the Internal Information Systems of the Mapfre Group companies as the ideal and preferred channel for communicating information or complaints about possible irregularities or acts committed within it that are potentially illegal, contrary to the law or to the values and rules regulating the behavior of the Entity included in the *Code of Ethics and Conduct*, in accordance with the applicable regulations.
- **Internal Regulations on Conduct in the securities markets**, which regulate the specific rules of conduct that must be known and complied with by all persons included in its scope of application in relation to the securities issued by Mapfre, S.A. and, where applicable, with those of other entities of the Group listed on secondary markets.
- **Other internal corporate rules**. The Entity has a comprehensive set of internal corporate rules that govern essential aspects of its governance and operation. These rules cover, among other things, matters related to corporate organization and governance, ethics and integrity (including anticorruption, human rights, and anti-fraud policies), the prevention of money laundering and terrorist financing (applicable to branches and/or representative offices outside the European Union that are considered obliged entities under their local regulations), tax and financial management, diversity and equal opportunities, occupational health, safety, and well-being, data protection and cybersecurity, as well as sustainability and respect for the environment. They also include guidelines on the procurement of goods and services, conflict of interest management, purchasing procedures, corporate transactions, and digital operational resilience.



- **Solvency II Policies.** In accordance with the provisions of the *Solvency II Directive*, the Entity has all the written policies established in the regulations and must guarantee their application.
- **Internal and external audit reports** relating to the verification of financial statements, the application of data protection regulations, security and the environment, etc.
- **Continuous Training.** The Compliance Officer is responsible for raising awareness among staff and ensuring their ongoing training through the implemented training plan. To facilitate this task, the Mapfre Group provides a comprehensive training tool. Specifically, the Group has a global training model organized through the Corporate University's Knowledge Schools, which bring together training programs developed at both global and local levels. E-learning courses include, among others, those on the *Code of Ethics and Conduct* and internal control standards, audit training, and a specific course on the Compliance Function. This last course explains the function, its objectives, and responsibilities, emphasizing the importance of its implementation to minimize the legal and non-compliance risks to which entities are exposed.
- **Corporate sustainability.** The Mapfre Group has a mandatory regulatory framework for sustainability, applicable to all its entities and their respective governing bodies. This framework establishes guidelines that enable any entity to develop and promote socially responsible behavior, regardless of the form—conventional and/or digital—in which the business is conducted and the country in which it operates. Internal regulations include principles of action that are transversal to the entire organization, forming the basis for building a global commitment to sustainability and sustainable development.
- **Corporate website.** Through the corporate website of Mapfre, S.A. www.mapfre.com, the *Institutional Principles* and the *Code of Ethics and Conduct*, of corporate scope and applicable to the Entity, are made public, among others.
- **Mapfre Re website.** Through the website www.mapfrere.com, the Entity makes available to its stakeholders, access to the Internal Information System and other relevant data.
- **Other rules and procedures.** There are rules and procedures that regulate specific matters, the objective of which is to prevent criminal conduct. These cover, among other things, matters related to corporate governance and organization, including directors' remuneration and procedures for managing and approving related-party transactions. They also address aspects of financial and human resource management, including the prevention and



handling of harassment. In the digital sphere, they regulate the right to disconnect, the use of electronic communications, data protection and governance, cybersecurity, and the management of external data, strengthening operational resilience. They also regulate matters related to digital communication and marketing and include guidelines on customer relations.

6.2 Internal Governance

a) Management and supervisory bodies

The Entity has the following bodies that perform control and monitoring tasks:

- **General Shareholders' Meeting:** It is the highest governing body of the Entity through which the social will is expressed. It is governed by the provisions of the law, the Entity's bylaws, and the regulations that develop them.
- **Board of Directors:** is the highest administrative and representative body of the Entity and focuses its activity, within the terms of the applicable regulations, on supervising the ordinary direction, effective management and control of the Entity's business, in accordance with the general strategic guidelines and policies established by Mapfre, S.A. and under its supervision, organization and coordination.
- **Delegated Committee:** acts as a delegated body of the Board of Directors. It is permanently vested with all the powers of the Board of Directors except those that are legally non-delegable.
- **Audit, Risk and Compliance Committee:** has attribution, among others, powers in matters of internal control, internal audit, risk management, financial information, audit of accounts and compliance.

Regarding compliance, it oversees the activities of the Compliance Function. In addition, among other things, it reports on the Entity's *Compliance Policy* and *Criminal Prevention Model*, ensuring their alignment with general rules and policies at the Group level; it oversees the Entity's Internal Information System, in accordance with internal regulations; and it verifies the adoption of actions and measures resulting from reports or inspections conducted by administrative supervisory and control authorities.

- **Reinsurance Business Unit Management Committee:** This is the body that drives the development and execution of the reinsurance business, as well as its various initiatives, under the supervision of the Executive Committee of Mapfre, S.A.



In accordance with its regulatory norms, it is responsible for periodically analyzing the situation of compliance in the Entity, of the general norms and policies approved by the administrative and management bodies and, in particular, those established at the Group level in matters of Investments, Financing, Risk Management and Internal Control, and Sustainability, and for adopting the necessary measures for their achievement.

b) Other non-management bodies of the Entity

The Entity also has other non-management bodies, which perform relevant functions for the proper management of its activities:

- **Data and Artificial Intelligence Operations Committee:** This body leads and governs the operational aspects of the Data and Artificial Intelligence strategy at Mapfre Re, ensuring its corporate alignment and orderly deployment across domains. It guarantees the responsible and high-quality use of data, coordinates Data Owners and key roles, measures the value generated, drives continuous improvement, and reports to the Management Committee.
- **IT Operations Committee:** ensures efficient, strategic management aligned with organizational objectives in the technological field, promoting innovation, internal control and optimal use of technological resources.
- **Security, Crisis, and Resilience Committee:** Its mission is to guarantee the protection of Mapfre Re's strategic interests by promoting a comprehensive security culture, organizational resilience, and operational continuity. It plays a key role in mitigating risks, strengthening crisis response capabilities, and ensuring that security is a fundamental pillar in all corporate processes and decisions.
- **Underwriting Committee:** This is the body responsible for approving reinsurance contracts that exceed the autonomy set out in the Entity's Underwriting Rules, such as structured contracts (*Financially Motivated Reinsurance*) and responsible for periodically reporting to the Management Committee the list of reinsurance contracts analyzed within it.

c) Other committees of the Mapfre Group

The Mapfre Group has other non-management bodies that perform relevant functions for the proper management of its activities:

- **Sustainability Operations Committee:** The Mapfre Group has a Sustainability Operations Committee, a body reporting to the Executive Committee of Mapfre, S.A. This internal body has executive functions and the authority to provide information, advice, and make proposals on sustainability



matters, in accordance with the powers granted by its governing regulations. Its responsibilities include monitoring international sustainability initiatives and the commitments undertaken by the Mapfre Group, as well as evaluating and, where appropriate, proposing to the relevant body the adoption of new initiatives that align with the Group's sustainability strategy.

- **The Security, Crisis, and Resilience Committee** is responsible for ensuring that business objectives and needs govern the activities of the Corporate Security Function, and for guaranteeing that the recommendations of the Corporate Security Function are taken into account in business processes. It also has responsibilities for management and control in the areas of business continuity and crisis management.
- **Global Business Committee:** Responsible for analyzing the development of the Mapfre Group's insurance and services businesses worldwide, compliance with established plans, and proposing corrective and improvement actions.
- **Mapfre Group Underwriting Policy Committee:** whose main objective is to promote, develop and update the Underwriting Policy.
- **Acquisitions Committee:** intervenes, directs and coordinates the work to be carried out in each acquisition or divestment process, such as the technical valuation, the development of the *due diligence* (extensive due diligence procedures are carried out on potential business partners, also regarding corruption and bribery), the negotiation of contracts and the closing of the transaction.

It also operates as an advisory body, providing its assessment to the governing bodies responsible for making the final decision on that acquisition or divestment.

Its actions are guided by the following objectives: rigor in the process of a potential acquisition, efficiency in the resources applied to acquisition operations, objectivity in the information and in the valuations, prior study of the possible consequences of the acquisitions and subsequent monitoring and evaluation on the fulfillment of the estimates.

- **Transformation and Innovation Committee:** delegated body of the Executive Committee of Mapfre, S.A., specialized in technological transformation and innovation, which corresponds to the powers that said Executive Committee attributes to it at any given time in these matters.
- **People Committee:** established to promote coordinated action regarding the selection, appointment, professional development, and compensation of



management personnel. Its decisions are geared towards achieving the strategic objectives established by the Board of Directors of Mapfre, S.A.

d) Key Functions of the Governance System

In accordance with the provisions of *Article 65 et seq. of Law 20/2015, of July 14, on the Regulation, Supervision and Solvency of Insurance and Reinsurance Entities (LOSSEAR)*, the Entity has an effective governance system that guarantees the sound and prudent management of the activity, proportionate to its nature, volume and complexity of its operations, which includes the following key functions: risk management, actuarial, compliance and internal audit.

e) Internal Control System and Risk Management

The Entity has established an appropriate internal control system in accordance with its organization, with an adequate structure and appropriate information mechanisms at all levels of the Entity.

The Entity has adopted the three lines of defense model for managing its risks:

- i) A first line of defense comprised of employees, management, and the operational, business, and support areas responsible for maintaining effective control over the activities they perform as an inherent part of their daily work. They are, therefore, the ones who assume the risks and are responsible for designing and implementing the necessary control mechanisms to mitigate the risks associated with the processes they carry out and to ensure that the risks do not exceed established limits.
- ii) A second line of defense comprised of the Risk Function, the Actuarial Function, the Compliance Function and other assurance functions, who ensure the functioning of internal control and risk management systems.
- iii) A third line of defense constituted by the Internal Audit Function, which performs the independent evaluation of the adequacy, sufficiency and effectiveness of the internal control and risk management systems, communicating any deficiencies in a timely manner to the parties responsible for applying corrective measures, including senior management and governing bodies as appropriate.

7 Supervision and control of the *Model*

The supervision of the operation and compliance of this *Model* corresponds to the Compliance Officer of the Entity, in the terms established by the approved *Compliance Policy*, which aims to ensure that the Entity operates within the regulatory compliance framework in order to achieve a global compliance environment.



For this purpose, the Compliance Officer identifies, assesses, monitors, and reports on the risk of non-compliance in the activities carried out. Non-compliance risk is defined as the risk of legal or regulatory penalties, material financial losses, or reputational damage that the Entity may suffer as a result of non-compliance with applicable laws, regulations, rules, internal and external standards, or administrative requirements.

The effective management of these risks is considered a basic incentive for the sustainable and profitable growth of the Entity, contributing to the protection of its solvency, integrity and reputation, and supporting the achievement of its strategic objectives.

In this regard, the Compliance Officer carries out the function of supervision and control of the *Prevention Model* in the Entity, performing the following activities in the field of criminal prevention:

- i) Monitor the operation and effectiveness of the *Model* and ensure its compliance within the Entity.
- ii) Identify the activities within which the crimes to be prevented may be committed, as well as evaluate the existing controls for their mitigation and propose, where appropriate, the relevant recommendations, adopting and/or proposing the adoption of the appropriate measures to guarantee compliance with the *Model*.
- iii) To periodically inform the Board of Directors of the Entity, through the Audit, Risk and Compliance Committee, of significant incidents or anomalies related to the Entity's *Model* and, in particular, to report on the possible insufficiency of the resources allocated to guarantee its effective application.
- iv) Prepare a *Compliance Verification Plan* for the supervision of the *Model* and propose its approval to the Board of Directors of the Entity, after a report from the Audit, Risk and Compliance Committee.
- v) Inform the Board of Directors of the Entity, through the Audit, Risk and Compliance Committee, of the established action plans, indicating the initiatives and measures to be adopted in the exercise and review of the activities pending to be carried out during the previous year.
- vi) Identify, where appropriate, new areas of risk and implement and maintain systematic procedures for reviewing the Entity's *Model* in order to provide the Entity's governing bodies with a reasonable level of assurance regarding its monitoring, compliance and adequacy.
- vii) Ensure the dissemination and training on the principles of the *Model*, with the collaboration of the Human Resources Area.



- viii) Modify or periodically update the Entity's *Model* and the internal procedures and rules that are part of it in the face of relevant infractions, changes in the organization, in the control structure or in the activity carried out.
- ix) Inform the Corporate Compliance Office of Mapfre, S.A. about compliance with the obligation to approve a *Criminal Prevention Model*.

To this end, it has personnel with sufficient knowledge and professional experience, has the appropriate technical means and has access to the internal processes, necessary information and activities of the Entity, in order to guarantee a correct execution of the entrusted function.

8 Methodology for criminal risk management

The *Prevention Model* should be evaluated periodically to test its implementation and effectiveness.

The criminal risk management process is a homogeneous process that allows the Compliance Officer to carry out the indicated periodic evaluation to test said implementation and effectiveness, evaluate the criminal risks to which the Entity is exposed, identify the processes and activities in whose scope the crimes that must be prevented may be committed, identify and evaluate the controls implemented to prevent the commission of said crimes and establish a review of the effectiveness of the *Model*.

To do this, apply the methodology set out in the *Compliance Risk Management Process: Manual for the Compliance Officer*.

The main phases of this management process are detailed below:

- i) Risk identification.
- ii) Inherent risk assessment. iii) Residual risk assessment. iv) Determination of risk appetite.
- v) Conclusions and action plan.
- vi) Monitoring and continuous improvement.

The Compliance Officer periodically verifies that the controls implemented to mitigate the risk of committing crimes are in place, are adequate and sufficient. To this end, in accordance with the *Compliance Policy*, they prepare an annual *Activity Report*, which details, among other things, the management of noncompliance risk, specifying the status of existing controls to mitigate each of



the crimes that may be committed within the scope of their activities and the results of the verification carried out during that year.

9 Model Update

The Compliance Officer conducts ongoing reviews of this document and the attached *Catalogue*, updating them as necessary to ensure their provisions remain valid and up to date. In this regard, the Compliance Officer will propose modifications or updates to the *Prevention Model* to the Board of Directors in the event of significant breaches or changes in the organization, control structure, or activities. The Officer will also periodically inform the Board, and in any case, through the Annual *Activity Report*, of any further modifications or updates to the *Model*.

10 Resource management

The Entity's *Prevention Model* is equipped with the relevant financial, material and human resources necessary for its proper and effective operation.

The Compliance Officer reports annually to the Board of Directors, through the Audit, Risk and Compliance Committee, on the annual budget for the function necessary for its proper execution, as well as on the sufficiency of resources or means (material, economic and/or personal) that the Entity has to maintain an adequate level of control of the activities that generate criminal risks and mitigate the risk of committing illegal acts.

11 Model non-compliance: notifications of suspicious activity and sanctioning procedure

The existence of channels for reporting internal non-compliance or illegal activities is one of the key elements of the Entity's *Prevention Model*.

Any person, including employees of the Entity, who has any indications or suspicions about possible irregular conduct or potentially illegal acts or acts contrary to the Law or internal regulations within the Entity, including, in particular, any conduct that could constitute a crime, a serious or very serious administrative offense or an infringement of European Union Law, must report them through the enabled Internal Information System.

The Internal Information System Committee is responsible for the Entity's Internal Information System. It is a collegiate body, appointed by the Entity's governing body.



This Committee allows the Entity to act diligently in the event of a possible breach of the *Model* by following a procedure for action in the event of any suspicious activities.

Its composition and operation are regulated in the *Corporate policy on the Internal Information System* and in the *Information Management Procedure of Mapfre Re* approved by the Entity.

The appointment and dismissal of the members of this Committee are communicated to the *Autoridad Independiente de Protección del Informante*, in accordance with current regulations.

Without prejudice to the autonomy and independence of the Entity and its own *Internal Information System*, the Compliance Officer must inform the Corporate Compliance Director of the complaints that, in view of the possible impact on the Mapfre Group as a whole, are determined in the Entity's *Information Management Procedure*.

Maximum confidentiality is ensured regarding the identity of the whistleblower and any person included in the complaint, and the necessary reasonable support and protection measures are adopted to protect whistleblowers 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 or bad-faith complaint or information is made.

Failure to comply with the internal regulations that incorporate the company's organizational and management model, and especially with the measures established for the monitoring, control, and prevention of crimes referenced in this *Model*, constitutes a labor infraction and may be subject to sanctions. For groups acting on behalf of, for the account of, or in any way in the interest of the Entity, such non-compliance may result in the termination of their contractual relationship. All of this is without prejudice to any applicable administrative or criminal penalties.

The disciplinary procedure for employees of the Entity is applied by the Human Resources Area in accordance with the disciplinary regime established in the collective bargaining agreement and applicable labor regulations. Notwithstanding the foregoing, appropriate measures must be taken to ensure the effective application of the established disciplinary regime.

12 Model Documentation

The implementation and development of the *Prevention Model* must be documented. This documentation must be kept for at least 10 years, or until the expiration of the corresponding statute of limitations for the offense, if it is longer.



The duty to preserve the aforementioned documentation for the indicated period is the responsibility of the Compliance Officer.

13 Training

The Entity includes in its training plans specific training actions on the prevention of criminal risks, managed by the Compliance Officer in coordination with the Human Resources Area.

14 Supervision, dissemination and monitoring

The Compliance Area is the Promoter of this *Model*, 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 dissemination of the *Prevention Model* is the responsibility of the Compliance Officer in collaboration with the Human Resources Area.

The Compliance Officer guarantees that this *Prevention Model* will be made available to all employees of the Entity through its inclusion in the Intranet.

Likewise, the *Institutional and Business Principles of the Mapfre Group* and the *Code of Ethics and Conduct* are available on the corporate website of Mapfre, S.A., www.mapfre.com, and an extract of this *Prevention Model* is available on the Entity's website, so that any third party is aware of the Entity's interest in the prevention of crimes within its organization and can report, through the channel provided for this purpose, the possible commission of crimes or conduct contrary to the Entity's internal regulations.

15 Approval and entry into force of the *Model*

This *Model* was initially approved by the Board of Directors of the Entity on November 28, 2017, and last modified on April 7, 2026, repealing and replacing the previously valid version.