

## INFORMATION MANAGEMENT PROCEDURE OF MAPFRE RE, Compañía de Reaseguros, S.A.

### 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 RE, Compañía de Reaseguros, S.A.

The purpose of the Procedure is to establish the necessary forecasts for the Internal Information System of MAPFRE RE, Compañía de Reaseguros, S.A. 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

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

### 3. SCOPE OF APPLICATION

This Procedure applies to MAPFRE RE, Compañía de Reaseguros, S.A. to its branches, representative offices and to those of its subsidiaries where so agreed by their respective management bodies.

### 4. SUPERVISORY BODY OF THE INTERNAL INFORMATION SYSTEM

The Internal Information System Committee of MAPFRE RE (**The Committee**) is the Supervisory Body of the Internal Information System designated by MAPFRE RE. 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 is therefore responsible for receiving and processing Complaints (including their admission to processing, the opening of investigation case for the facts reported, the appointment of the Investigation Investigator, and the analysis of the conclusions of the investigation carried out), as well as its resolution (determining whether or not the reported violation or irregularity or any other instance has occurred) and the decision on the pertinent actions to be taken, in each case.

The Committee delegates to the Secretary of the Committee, 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.

The operating system of the Internal Information System Committee will be regulated by the corresponding regulation approved for this purpose. The Case Investigator will attend the Committee meetings to provide relevant information and clarifications regarding the Complaints they have been tasked with investigating, whenever deemed appropriate.

## 5. SUBMITTING COMPLAINTS OR INFORMATION

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 Internal Information System of MAPFRE RE. Notwithstanding the above, any individual may approach the channel established in Spain by the Independent Informant Protection Authority, the authorities or competent bodies of the Autonomous Communities, other organizations (Bank of Spain, SEPBLAC, CNMC, CNMV, etc.), as well as, where applicable, the competent institutions, bodies, or organizations established within the European Union to submit their Complaint as well as, where appropriate, to any other channel established by the competent Authorities in the countries in which MAPFRE RE has a presence and to which this Procedure is applicable.

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

- Corporate platform accessible via <https://mapfrere.com>
- Email: [mapfrere.sistemainternodeinformacion@mapfre.com](mailto:mapfrere.sistemainternodeinformacion@mapfre.com)
- Postal service: A/A MAPFRE RE Compliance Area, Paseo de Recoletos 25 (28004 Madrid)

Complaints may also be submitted verbally 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.

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

## 6. RECEIPT, ADMISSION, AND REGISTER OF COMPLAINTS

Upon receipt of the Complaint through any of the indicated Channels, the Secretary of the Committee will send an acknowledgment of receipt to the Informant who has identified themselves and provided an address, email, or secure location for receiving notifications, within seven (7) calendar days, unless doing so could compromise the confidentiality of the communication or the Informant has waived the right to receive information about their Complaint. Likewise, the Secretary of the Committee will analyze 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 Group Head of Compliance Office 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 rumors 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 Corporate General Counsel and Legal Affairs Area 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 behaviors 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 Secretary of the Committee will close the case, providing a reasoned record of this decision in the Internal Information System 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.

If, after analyzing the Complaint, the Secretary of the Committee 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 MAPFRE RE. The Committee will analyze 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 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 (the **“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.

In the case of Complaints concerning acts or behaviors 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 Investigative Body referred to in the aforementioned Protocol. This body will carry out the investigative procedures in accordance with the internal procedure and timelines established in that document. In 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 Corporate Security Division, which will conduct the investigative procedures in accordance with the provisions of said Policy.

The Committee will decide to suspend the processing of the case when it becomes aware of the use of external channels 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, the Committee will agree to send the information on them to the Corporate General Counsel Area for forwarding to the Public Prosecutor's Office. If the financial interests of the European Union are affected, it will also inform the European Prosecutor's Office.

The Secretary of the Committee 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 Committee will adopt the necessary measures to guarantee the confidentiality and protection of all data included in the 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 Supervisory Body of the Internal Information System.

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 Secretary of the Committee shall forward it to the Group Head of Compliance Office, after analyzing it, will send the Informant the relevant response as soon as possible.

## **7. 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 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 honor, the right to an impartial investigation of the facts, the right of defense 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 MAPFRE, S.A.

## **8. RESOLUTION OF COMPLAINTS**

Based on the elements, data, investigations, and conclusions presented in the Case Investigator's Report, the Internal Information System Committee of MAPFRE RE 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) MAPFRE REs People and Organization Area, 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 labor legislation. The adoption and content of such measures will be communicated to the Secretary of the Committee, who will then inform the Committee.

Additionally, in the case of Complaints related to facts that could constitute harassment behavior 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 Corporate Labor Relations Department, with anonymized personal data, 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 Appointments and 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 Group Head of Compliance Office, who will inform the Committee accordingly.
- (c) The Corporate General Counsel Area, when, despite an initial assessment indicating that the facts may not constitute a criminal offense, the investigation concludes otherwise, so that the Area can evaluate the referral to the Public Prosecutor's Office (or to the European Public Prosecutor's Office if there is an impact on the financial interests of the European Union). The Secretary of the Committee will be informed of the decision taken, and the Committee will be subsequently notified. The same will also occur when the Resolution concludes that a provider or collaborator of the Company has committed an irregularity or an unlawful or illegal act contrary to the law, for the adoption of the corresponding contractual and/or legal measures, the adoption and content of which will inform the Group Head of Compliance Office, who will forward it to the Committee.
- (d) Any other Corporate Area or 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 Group Head of Compliance Office, who will then forward it to the Committee.

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 Supervisor, the aforementioned period may be extended to a maximum of three (3) additional months.

In the event that the Affected Person is a senior executive or a member of the governing body of any Group Company, or if the Complaint or Information poses any significant reputational risk to the Entity, the Secretary of the Committee shall inform the Group Head of Compliance Office of the content of the Complaint, its processing and timely resolution, and the Committee and the Group Head of Compliance Office shall adopt, in coordination, the corresponding decisions on the relevant actions to be taken based on the conclusions of the investigations undertaken.

## **9. PERSONAL DATA PROTECTION**

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

## **10. INFORMATION TO GOVERNING BODIES**

Every year, the System Supervisory Body will send to the Entity Board of Directors 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 System Supervisory Body 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 MAPFRE RE.

## **11. DISSEMINATION**

This Management Procedure will be included together with the Policy in a separate and identifiable section of the website home page [www.mapfrere.com](http://www.mapfrere.com), which will contain clear and easily accessible information on the Internal Information System and the use of the Internal Complaints Channel, as well as on the internal portal.

## **12. TRAINING**

The Corporate Compliance Directorate 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 MAPFRE, S.A. and this Procedure. To this end, its actions will be coordinated with the Areas responsible for training and internal communication.

## **13. APPROVAL, ENTRY INTO FORCE, AND REVIEWS**

This Management Procedure was approved by the Board of Directors of MAPFRE RE on February 24, 2025, the date from which it entered into force, revoking and replacing the previous one.

The Secretary of the Committee 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 MAPFRE RE, where appropriate.