



COMPLIANCE POLICY

COMPLIANCE POLICY

1. OWNER OF THE POLICY

Corporate Compliance Office.

2. SCOPE

This Policy applies to all Group companies.

The principle of proportionality shall be taken into account for the degree of implementation of this policy.

3. OBJECTIVES

This policy establishes the general principles, the general framework for action, the scope and assignment of competencies and responsibilities of the Compliance Function, as well as the reporting procedures established, while ensuring consistent application throughout the Group.

For this purpose, the Compliance Function:

- With regard to the regulations being developed, it identifies, analyzes, assesses and reports on the exposure to legal risk of the activities carried out by the company or the Group.

Legal risk is defined as an event consisting of a regulatory, jurisprudential or administrative change that may adversely affect the company or Group.

- The compliance function identifies, assesses, monitors and reports on the risk exposure associated with any non-compliance with current legislation that may be incurred through the activities performed by the company or the Group.

Non-compliance risk is defined as the risk of legal or regulatory sanctions, financial and material losses, or loss of reputation that may affect the company as a result of non-compliance with the laws, regulations, rules, internal and external standards or administrative requirements applicable to its activity.

The effective management of legal risks and non-compliance is regarded as a basic boost to sustainable and profitable growth. It also helps protect the Group's solvency, integrity and reputation while supporting the Group in achieving its strategic objectives.

4. GENERAL PRINCIPLES

The Compliance Function, as a key function within the governance system, forms part of the Group's basis for strengthening its institutional commitment to conducting all its activities and businesses in line with strict rules of ethical behavior and compliance with current legislation.

The Compliance Function also contributes to the Group's capacity to minimize legal and non-compliance risk, helping to raise awareness of compatibility with internal and external regulations and ensuring that this compliance is properly integrated in the Group's culture and all its activities.

The companies' Management demonstrates its commitment to the work of the Compliance Function, supports its activity and ensures its operational independence, while providing it with the appropriate means for the performance of its functions.

Persons performing the competencies of this function may have unrestricted access to any information that is relevant to carrying out the tasks they are responsible for. All the organization's personnel must

support and collaborate with them.

Regular communication and training programs are also conducted to make employees aware of the risks they face.

5. GOVERNANCE, COMPETENCE AND REPORTING LINE FRAMEWORK

The Compliance Function is part of the second line of defense of the Internal Control System and it ensures that the MAPFRE Group, as a whole, operates within the framework of regulatory compliance. It is structured within the organization through the Corporate Compliance Management the Specific Compliance Areas as well as the Compliance Supervisors within the companies.

The Specific Compliance Areas also perform second-line defense tasks in specific issues not included in this policy.

The Compliance Function of the companies is governed by the provisions of this policy in line with the principle of proportionality, as well as by relevant local regulatory requirements.

Each company carries out its own implementation and development strategy of the function, in line with the reference criteria issued by Corporate Compliance Management. The Compliance Supervisors at the companies have a double reporting structure. Organizationally, they report to their superior at their company, and functionally, they report to Corporate Compliance Management.

The Group Head of Compliance Office is appointed and, where appropriate, removed by the Board of Directors of MAPFRE S.A., at the proposal of the Appointments and Remuneration Committee. This position has the responsibilities assigned within the scope defined in this policy and reports to the Board of Directors of MAPFRE S.A. through the Audit and Compliance Committee and to the Group's Chairman and CEO.

6. SCOPE AND ALLOCATION OF RESPONSIBILITIES

The Compliance Function advises the Board on compliance with the laws, regulations and administrative provisions that affect the company or the Group, and on compliance with internal regulations. It also performs an assessment of the impact of any changes in the legal environment affecting the operations of the company or the Group and determines and assesses non-compliance risk.

In any case, the following matters are included within the competence of Corporate Compliance Management and the Compliance Supervisors of the companies, provided that they are applicable to their activity:

- Insurance contract
- Insurance management and supervision
- Distribution of insurance policies
- Competence
- Consumer and user associations
- Market abuse
- Prevention of corruption and the criminal responsibility of legal entities
- Prevention of money laundering and financing of terrorism
- International sanctions
- Exchange of information: FATCA/CRS
- Marketing, communications and advertising

- Branding and other industrial property rights

Matters whose competence corresponds to Specific Compliance Areas as a second line of defense are outside the scope of this document.

Responsibilities of Corporate Compliance Management and the Compliance Supervisors in the various Group companies

1. To provide the following information to the governing body:
 - a. At least annually, an Activity Report summarizing the activities carried out in the previous period, to be prepared for and submitted to the governing body. In particular, information must be provided concerning overall results in the following fields:
 - non-compliance risk management
 - legal risk management
 - policy management.
 - training activities in the field of compliance.
 - awareness and sensitization activities in the field of compliance.
 - b. All persons shall immediately report any incident of non-compliance of which they gain knowledge, and which affects, or may affect, the activity of the company or of the entire Group.

In this regard, events that may have a financial, material or reputational impact on the company and/or the Group are considered as incidents of non-compliance.
2. To submit the Compliance Verification Plan annually to the governing body and seek its approval for it.
3. To advise the governing body on compliance with laws, regulations and administrative provisions affecting the company or the Group.
4. To identify and evaluate non-compliance risks in line with the methodology defined for managing the said non-compliance risk.
5. To identify and evaluate the impact of any change in the legal environment in the company or the Group's operations.
6. To manage existing internal policies of the company or Group in line with the established management process.
7. To advise, where required, on new products, services and markets from the point of view of compliance, identifying and evaluating the legal and non-compliance risks associated with them, and participating in the corresponding committees that are constituted for this purpose.
8. To monitor the result of actions by different supervisors and administrative supervisory bodies.
9. To monitor any violations of the relevant regulations and court judgments affecting the operation of the company or the Group.
10. To promote awareness among the personnel and ensure continuous training, in collaboration with training supervisors, to create a culture of compliance and to increase awareness of laws, regulations, standards, policies and procedures on compliance-related topics.

11. To ensure that its own personnel is adequately trained and supported to enable it to stay up-to-date with compliance requirements.

To this end, Compliance Supervisors will carry out the relevant work and provide Corporate Compliance Management with the information it requires to perform its responsibilities for the Group as a whole.

Without prejudice to the activities indicated above, Corporate Compliance Management also performs:

1. The supervision and control functions assigned in the MAPFRE S.A. Criminal Risk Prevention Model.
2. The responsibilities assigned in the Corporate Policy of the Internal Whistleblowing System, as well as in the Management Procedure implemented in MAPFRE in application of Directive (EU) 2019/1937 of October 23, 2019 on the protection of persons who report breaches of Union law.