

*WARNING: The English version is only a translation of the original in Spanish for information purposes. In case of discrepancy, the Spanish version shall prevail.*



## ANTI-CORRUPTION POLICY

## **1. Introduction**

As a global business group, MAPFRE remains committed to conducting its operations worldwide in an ethical manner and in accordance with the various applicable laws and regulations.

MAPFRE continuously ensures that its people act not only in accordance with the current legislation, but also in accordance with high standards of professionalism, integrity and a sense of responsibility within the framework of their professional activity, both in their relations with each other and in their relations with third parties. These standards are compiled in the MAPFRE Code of Ethics and Conduct, which is the fundamental pillar on which MAPFRE's ethical conduct is based.

## **2. Purpose**

This policy specifies and develops MAPFRE's commitment to reject corruption in all its forms, including extortion and bribery.

This policy also sets out the performance standards and framework for preventing and detecting corrupt practices in MAPFRE's activities in any of the countries where it is present.

## **3. Scope of application**

This policy applies to all MAPFRE employees, as well as to those who hold senior management positions or who belong to the Management bodies of MAPFRE companies. It also applies to those third persons who intervene, collaborate, represent or act on behalf of MAPFRE in operations related to the Group's activities.

## **4. MAPFRE's commitments and performance standards against corruption, bribery and extortion**

MAPFRE rejects all unethical practices aimed at inappropriately influencing the conduct and will of other people with the objective of gaining advantages or benefits. On this basis, it governs its activities in accordance with the following commitments and performance standards:

- MAPFRE undertakes not to influence the will, objectivity or conduct of people outside the company in order to obtain advantages or benefits by conducting unethical or unlawful practices.
- MAPFRE will not tolerate any circumstance in which any of its employees, or anyone who holds a senior management position or

who belongs to the Management bodies of the MAPFRE companies, solicits, accepts, promises, offers or bestows, directly or indirectly, gifts, payments, invitations, commissions, compensation, favors or advantages of any type, in order to obtain remuneration or to attempt to inappropriately influence their business or professional relations with public or private companies, public officials, employees, managers or administrators of public or private companies or bodies, organizations, political parties, politicians or candidates for public office.

- MAPFRE remains independent and neutral with respect to the different political stances of each country. On this basis, MAPFRE makes no contribution, financing or donation to political parties, their representatives or their candidates.
- MAPFRE prohibits any conduct that may constitute extortion in the framework of its commercial activity or that uses violence or intimidation for the purpose of obtaining a benefit.
- MAPFRE does not allow third parties or companies to exercise the conduct described above in relation to its employees, or to those who hold senior management positions or who belong to the Management bodies of MAPFRE's companies.
- Any service provided or received by MAPFRE must be legitimate and, both in nature and in price, must be duly documented by a contract previously approved by the appropriate contracting authority. MAPFRE payments must reasonably and rationally reflect the value of the compensation received. In no case shall payments be made to natural or legal persons other than those appearing on the corresponding invoice or contract.
- MAPFRE undertakes to reflect faithfully, transparently and in accordance with the law in force in each territory all of the company's actions, transactions and operations in its books and records legally established to that effect.
- MAPFRE promotes internal training on the prevention of and fight against corruption.

## **5. Dissemination, control and compliance.**

MAPFRE will appropriately disseminate this policy so that it is known internally and externally by the different stakeholders.

MAPFRE uses the ethical complaints and inquiries channel in order to incorporate complaints related to the principles and performance standards to which this policy refers.

Employees, as well as those who hold senior management positions or who belong to the Management bodies of MAPFRE companies, are required to inform the company, either through their senior manager or by reporting to the Ethics Committee, of any cases of corruption they are aware of or have reasonable evidence of.

MAPFRE undertakes to adequately manage and take appropriate measures with respect to any event of corruption that may occur within it, bringing it to the attention of the competent authorities and taking appropriate legal action, where appropriate.

## **6. Approval and review**

This policy was approved by the Board of Directors of MAPFRE S.A. on December 21, 2020.