



**INTERNAL RULES OF CONDUCT REGARDING SECURITIES  
ISSUED BY MAPFRE S.A.**

February 11, 2025

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## **INTERNAL RULES OF CONDUCT REGARDING SECURITIES ISSUED BY MAPFRE S.A.**

### **TITLE I. ON THE RULES OF CONDUCT**

#### **Artículo 1º.- Purpose**

These Internal Rules of Conduct Regarding Securities Issued by MAPFRE S.A. (the “**Rules of Conduct**”) are a part of the corporate governance of MAPFRE S.A. (the “**Company**”). Their purpose is to define the principles and framework of activities that must be applied by all persons associated with the Company, in the context of the securities markets, and in compliance with Spanish Law 6/2023 of March 17, on Securities Markets and Investment Services (the “**Securities Markets Act**”) and Regulation (EU) 596/2014 of the European Parliament and of the Council of April 16, 2014, on Market Abuse (the “**Market Abuse Regulation**”), as well as their implementing regulations.

#### **Artículo 2º.- Entry into force and updating**

1. These Rules of Conduct will enter into force on the date they are approved by the Board of Directors.
2. If any changes are made to these Rules of Conduct, the Persons Subject to the Rules must be notified. They must confirm receipt of that notice, and must personally state that they are aware of, understand, and accept the Rules of Conduct and all commitments they must make in compliance with them.

#### **Artículo 3º.- Compliance**

1. The Secretary of the Company’s Board of Directors is responsible for oversight of effective compliance with the obligations established in the Rules of Conduct. The Secretary will be able to appoint other persons to assist with this function, either permanently or on an *ad hoc* basis.
2. The Secretary may propose any measures deemed appropriate for dissemination, oversight, and improvement, with special attention to updating of the Rules of Conduct whenever required by the applicable legislation.
3. The Secretary of the Company’s Board of Directors has been granted the authorities and independence necessary to carry out the functions assigned to that office in these Rules of Conduct.
4. Any failure to comply with the contents of these Rules of Conduct will result in the consequences imposed under the applicable laws and regulations, including any civil or criminal liability that may apply in any given case, and it will also be understood as either a serious or very serious employment infringement, to be

determined during the procedure followed in accordance with the legal provisions in force.

#### **Artículo 4º.- Interpretation**

Any issues that arise in relation to interpretation and application of these Rules of Conduct must be resolved by the Secretary of the Company's Board of Directors, and where appropriate, that Secretary may escalate any such matters to the Board of Directors if considered relevant.

### **SECTION II.** **DEFINITIONS**

#### **Artículo 5º.- Definitions**

The following defined terms are used in relation to these Rules of Conduct:

- (i) Senior Management: means members of the Company's Board of Directors that perform executive functions; the most senior management representatives of the Business Units and Regional Areas; the Secretary of the Company's Board of Directors; and the General Managers and Deputy General Managers of the Global Corporate Areas.
- (ii) Senior Representatives: means the directors of the companies belonging to the MAPFRE Group (the "**Group**") (i.e., members of their Boards of Directors, their Sole Directors, and their Joint or Joint-and-Several Directors).
- (iii) External Advisers: means natural or legal persons that are not Senior Representatives, Senior Management, or the Company's employees, and that provide financial services, legal services, consulting services, or any other type of services to any of the Group's companies via a private-sector or commercial relationship.
- (iv) Secrecy Phase: means the time period existing between the time when Inside Information is discovered and the time when it loses its status as such, either because it is disclosed to the Spanish National Securities and Exchange Commission (CNMV), the project is abandoned, or for any other circumstances that cause it to lose that status.
- (v) Group: means the corporate group consisting of the Company (as the parent company) and its subsidiaries and other affiliates in accordance with the applicable commercial legislation.
- (vi) Inside Information: means any information of a precise nature that has not been made public, relating directly or indirectly to the Securities, and which if it were made public, would be likely to have a significant effect on the prices of the Securities on a market or organized trading system.

Information must be understood to be of a precise nature if it indicates a set of circumstances which exists or may reasonably be expected to come into existence or an event which has occurred or may reasonably be expected to do so and if it is specific enough to enable a conclusion to be drawn as to the possible effect of that set of circumstances or event on the prices of the Securities.

In the case of a protracted process that is intended to bring about, or that results in, particular circumstances or a particular event, those future circumstances or that future event, and also the intermediate steps of that process which are connected with bringing about or resulting in those future circumstances or that future event, may be deemed to be precise information.

An intermediate step of a protracted process must be understood as Inside Information if it, by itself, meets the criteria for Inside Information contained in this definition.

In addition, it must be understood that information would be likely to have a significant effect on the prices of the Securities if a reasonable investor would be likely to use it as part of the basis of their investment decisions.

- (vii) Transactions with Own Securities: means transactions that the Company performs, either directly or through any of the Group's companies, involving the Securities.
- (viii) Personal Transaction: means any transaction related to the Securities and performed by Persons Subject to the Rules, or as the case may be, by their Associated Persons, under the terms established in the applicable laws and regulations.
- (ix) Other Relevant Information: means all other information (other than Inside Information) of a financial or corporate nature related to the Company, to the companies belong to the Group, or to the Securities, which they are obligated to publicly disclose in Spain, or which they consider as requiring disclosure to the investors because it is of special interest.
- (x) Administrative Personnel: means employees of the Group's companies who perform secretarial functions for Senior Management.
- (xi) Persons Discharging Managerial Responsibilities: means members of the Company's Board of Directors and General Managers and Deputy General Managers of the Global Corporate Areas.
- (xii) Persons Subject to the Rules: means the persons listed in Article 6 of these Rules of Conduct.
- (xiii) Persons Closely Associated: means natural or legal persons that have any of

the following connections with a Person Subject to the Rules:

- a) A spouse, or a partner considered to be equivalent to a spouse in accordance with national law.
  - b) A dependent child, in accordance with national law.
  - c) A relative who has shared the same household for at least one year on the date of the transaction concerned.
  - d) A legal person, trust, or partnership, the managerial responsibilities of which are discharged by a Person Discharging Managerial Responsibilities or by a person referred to in point (a), (b) or (c), which is directly or indirectly controlled by such a person, which is set up for the benefit of such a person, or the economic interests of which are substantially equivalent to those of such a person.
  - e) Any other natural or legal persons considered to be Persons Closely Associated under the laws and regulations in force at any given time.
- (xiv) Insider List: means the records governed by Article 12 of these Rules of Conduct.
- (xv) The Company's General Counsel: means the Company's General Counsel and Corporate Legal Affairs Area.
- (xvi) Securities: means (a) transferable securities issued by the Company or by any of the companies belonging to the Group, admitted to trading, or with such admission in progress, on an official secondary market or other regulated markets, multilateral trading facilities, or other organized secondary markets; (b) financial instruments and contracts that grant a right to acquire those securities; and (c) financial instruments and contracts with any of those securities, instruments, or contracts as their underlying assets.

### **SECTION III.** **SCOPE OF PERSONS SUBJECT TO THE RULES AND RECORDING AND DISCLOSURE OF OPERATIONS**

#### **Artículo 6º.- SCOPE OF PERSONS SUBJECT TO THE RULES**

Unless expressly stated otherwise, these Rules of Conduct must be understood as applying to:

- Senior Representatives.
- Senior Management.

- Persons Discharging Managerial Responsibilities.
- Administrative Personnel and persons working in the Corporate Administration and Finance Division; Corporate Investor Relations, Capital Markets and M&A Division; Corporate Communication; and the Company's General Counsel and Corporate Legal Affairs Area.
- Any other persons working for the companies belonging to the Group and External Advisors that, because of their position, professional relationship, or services provided, may have access to Inside Information.
- All other persons that, in the opinion of the Company's General Counsel, must be subject to these Rules of Conduct because of circumstances other than those indicated in the previous points, in accordance with the laws and regulations in force at any given time.

#### **Artículo 7º.- List of Persons Discharging Managerial Responsibilities and Associated Persons**

1. The Market Abuse Regulation requires the Company's General Counsel to draw up and maintain an up-to-date list of the Persons Discharging Managerial Responsibilities and their Persons Closely Associated, which must be treated as confidential in nature. The Persons Discharging Managerial Responsibilities must be notified regarding their inclusion on that list, the fact that they are subject to the Rules of Conduct, and the location where they can obtain a copy of the Rules of Conduct.
2. The Persons Discharging Managerial Responsibilities must sign a written acknowledgment of receipt for the notification described in the previous paragraph.
3. In turn, the Persons Discharging Managerial Responsibilities must provide written notification to their Persons Closely Associated regarding their obligations arising from these Rules of Conduct, and they must keep a copy of that notification.

#### **Artículo 8º.- Disclosure obligations for Personal Transactions**

1. Any person that becomes subject to these Rules of Conduct must perform an initial disclosure to the Company's General Counsel, using the form attached to these Rules of Conduct as an Appendix, and indicating the Securities held on that date, either by that person or any of that person's Persons Closely Associated.
2. In addition, all Persons Subject to the Rules must disclose to the Company's General Counsel all Personal Transactions they perform, as well as all those performed by their Persons Closely Associated. That disclosure must be

performed using the form attached to these Rules of Conduct as an Appendix, without delay and no more than seven business days after the transaction is formalized.

3. The disclosure obligations described in the points above are independent from the obligations that the Persons Discharging Managerial Responsibilities and their Persons Closely Associated have regarding disclosure of any Personal Transactions to the Spanish National Securities and Exchange Commission, in conformity with the applicable laws and regulations, which must be performed during the time periods specified and using the forms established for that purpose. However, sending a copy of that official disclosure to the Company will be sufficient to fulfill the obligation described in point 2 above.
4. If a request is made by the person involved to the Company's General Counsel, the Company may act as a representative of the Persons Discharging Managerial Responsibilities in relation to their obligation to disclose their Personal Transactions to the Spanish National Securities and Exchange Commission under the applicable laws and regulations.
5. All Persons Subject to the Rules are obligated to give express instructions to any entities managing their securities portfolios, stating that those managers must not perform any Personal Transactions unless they have first been duly disclosed. In addition, they are obligated to notify their portfolio managers regarding the restrictions imposed by these Rules of Conduct on transactions involving the Securities, to ensure that under all circumstances, those managers will comply with the prohibited time periods and make investment and divestment decisions only on the basis of their own professional judgment, in accordance with the same criteria they apply in general to clients with similar financial and investment profiles, and without being influenced by any Inside Information that the holder of the Securities may possess.
6. The obligations imposed in the points above must be understood as without prejudice to the need to comply with all other obligations established with regard to the Personal Transactions in the laws and regulations in force.
7. The Company's General Counsel is obligated to:
  - a) Periodically notify the Board of Directors or Steering Committee regarding all Personal Transactions performed by the Senior Representatives and Senior Management.
  - b) Duly maintain a file containing all communications and notices received, and all documents regarding any other activities related to the obligations described in this section. The information in that file must be treated as strictly confidential in nature.



**SECTION IV.**  
**RULES OF CONDUCT REGARDING INSIDE INFORMATION**

**Artículo 9º.- Prohibited activities**

1. All Persons Subject to the Rules that possess any type of Inside Information will be obligated to strictly comply with the provisions established in the Market Abuse Regulation, in the Spanish Securities Markets Act, and in these Rules of Conduct.

In particular, during the Secrecy Phase they must refrain from:

- a) Prepare or carry out any type of transaction, either directly or via any other parties, involving Securities to which that information refers, or any other type of operation where any of the Securities are underlying assets.

Exceptions to that Rule are preparation and execution of operations where the existence of the operation is itself the Inside Information; operations performed to fulfill an obligation that has come due to acquire or dispose of the Securities when that obligation is imposed under an agreement established before the person involved came to possess the Inside Information; and other operations performed in conformity with the applicable laws and regulations.

- b) Disclose any such information to any other parties, except in normal exercise of their work, profession, or office, and provided that under all circumstances they comply with the requirements imposed by these Rules of Conduct.
  - c) Recommend or induce any other person to perform transactions to acquire, sell, or transfer the Securities.
  - d) Recommend or induce any other person to cancel or amend any orders related to the Securities.
  - e) Use the recommendations or inducements referred to above when the person knows or ought to know that such use is based upon Inside Information.
2. The prohibitions established in this article apply to all Persons Subject to the Rules that possess Inside Information, whenever that person knows or ought to know that information of that nature is involved.

**Artículo 10º.- Temporal prohibitions**

1. During the time periods described below, the Persons Subject to the Rules must not perform any operations with the Securities, either directly or through any other parties:

- a) Within 30 calendar days prior to the date when the Company publishes its annual financial statements or the date when it publishes any interim financial reports.
  - b) Under any circumstances involving Inside Information related to investment or divestment projects, during the Secrecy Phase for those projects.
  - c) During any time periods that the Company's Chair or General Counsel have expressly determined as the best way to fully comply with the Rules of Conduct, or because the circumstances existing at a particular time require that prohibition.
2. Under no circumstances may any Securities acquired be disposed of on the same day as the acquisition transaction.
  3. Under any of the following circumstances, Persons Subject to the Rules may request authorization in advance from the Company's Board of Directors to perform operations during those periods:
    - a) In the event of exceptional circumstances, such as the occurrence of serious financial difficulties that require immediate sale of the Securities; or
    - b) When the trading involves transactions made under, or related to, an employee share or saving scheme, qualification or entitlement of Securities, or transactions where the beneficial interest in the relevant Securities does not change.
  4. It must be understood that a Person Subject to the Rules is in possession of Inside Information when any of the following circumstances occur:
    - a) They become aware of the economic-financial information to be sent to the Spanish National Securities and Exchange Commission before that information is disclosed, provided the contents of that information are significantly different from the market expectations regarding those results, or from the targets the Company has released.
    - b) They become aware of preparations being made for significant acquisitions or disposals of tangible, intangible, or financial assets, before that information is disclosed, where applicable.
    - c) They become aware of or participate in the preparation stage of any operation where, if carried out, its public knowledge would represent a disclosure of Inside Information under the terms established in the laws and regulations in force.

### **Artículo 11º.- Disclosure obligations**

1. The Company must disclose all Inside Information that directly concerns it, as soon as possible, by disclosing it to the Spanish National Securities and Exchange Commission under the terms established in the laws and regulations in force.
2. Under its own liability, the Company may delay its disclosure of Inside Information provided this occurs under the circumstances, and in conformity with the requirements, established in the applicable laws and regulations.
3. The contents disclosed must always be truthful, clear, complete, and when required by the nature of the information, quantified, in a manner that is not confusing, misleading, or deceptive. Under all circumstances, the contents and disclosure of the Inside Information must comply with the laws and regulations in force at any given time.
4. Once it has been disclosed to the Spanish National Securities and Exchange Commission, the information must also be disseminated via the Company's corporate website, where it must remain available for a period of at least five years.
5. Any Other Relevant Information that the Company believes is necessary to disclose because it is of special interest (non-regulated information), or because there is some legal or regulatory obligation to do so (regulated information), and provided it does not need to be treated as Inside Information, must be made available to the investors in conformity with the applicable laws and regulations.

## **SECTION V.** **PROCEDURES RELATED TO INSIDE INFORMATION**

### **Artículo 12º.- Insider List**

1. All persons that may have access to Inside Information must be added to the appropriate Insider List, which the Company's General Counsel will be responsible for creating and updating.
2. That Insider List must include all persons who work for the Company internally, as well as all those who work for it externally under a contract, or that perform functions that could allow them to gain access to Inside Information, such as advisors, accountants, and credit rating agencies.
3. That Insider List must contain the information required by the laws and regulations in force at any given time.
4. The Insider List must be updated under the following circumstances:
  - a) Whenever some change occurs that affects the reasons why a person

appears on the list.

- b) Whenever a new person must be added to the list.
  - c) Whenever a person appearing on the Insider List no longer has access to Inside Information.
5. Each update must specify the date and time of the change that gave rise to the need to update the list, along with all other circumstances required by the applicable laws and regulations.
  6. All information added to the Insider List must be maintained for at least five years, counted from the date of its recording or most recent updating.
  7. The Company's General Counsel must expressly notify all persons included on the Insider List regarding the nature of the information, their duty to maintain its confidentiality and prohibition against its use, and the applicable sanctioning system, all in conformity with the applicable laws and regulations. All of those persons must sign a receipt document to confirm their receipt of that notification and their agreement with it, and that notice must be given to them using any forms that the Company has established for that purpose.
  8. Whenever an external advisor is involved, that person must also sign a non-disclosure agreement.
  9. The Company's General Counsel must maintain a copy of the Insider List and make it available to the supervisory authorities.
  10. The General Counsel may create a permanent Insiders List that includes all persons that always have access to all of the Inside Information. That list must be updated whenever appropriate.

### **Artículo 13º.- Measures for safeguarding Inside Information**

1. All persons in possession of Inside Information have an obligation to safeguard it, without prejudice to their duties on disclosure and collaboration with judicial and governmental authorities under the terms established in the laws and regulations in force. They must therefore implement adequate measures to ensure that the information cannot be used in an abusive or unfair way, and where applicable, they must immediately implement the measures necessary to correct the results of any such usage.
2. Under any circumstances where, during the study or negotiation phase, those responsible for the various areas or for financial or legal operations receive or generate any information that could be classified as Inside Information, they must use a means that ensures sufficient confidentiality to notify the Company's General Counsel about it, on a case-by-case basis and as soon as that situation

arises, so that the General Counsel can make a determination regarding whether or not it is Inside Information. They must also implement the necessary measures in order to:

- a) Restrict knowledge of that information strictly to the Company's internal or external persons that have an essential need to know it.
  - b) Establish security measures that will apply to that information in terms of its custody, filing, access, reproduction, and distribution.
  - c) Monitor changes to the Securities on the markets, along with any news that the professionals and media sources that disseminate financial information may be issuing and that could affect them.
  - d) Immediately notify the Company's General Counsel regarding any circumstances that may have hindered, or could complicate, assurance of that Inside Information's confidentiality.
3. In addition to the contents of the previous sections and those regarding the Insiders List described in Article 12 above, the Inside Information must be managed in compliance with the following:
- a) Marking the information as confidential: All documents that may contain Inside Information must be clearly marked with the word "Confidential".
  - b) Code names: as soon as study begins for any operation or project that could represent Inside Information, it must be given a code name, and from that time forward it must be referred to using that code name and all documents
  - c) Filing: confidential documents must be filed separately from all other ordinary documents, in different locations designated for that purpose, which must have special protective measures that ensure access is available only to authorized personnel. In particular, they must be protected by filing them in areas with restricted access under lock and key, or by personalized computer passwords that are updated periodically.  
  
Distribution and reproduction: general distribution and sending of confidential documents must always be performed using a secure means that ensures preservation of their confidentiality. In particular, sending by email must be minimized and performed only if strictly necessary. Recipients of reproductions or copies of confidential documents must be prohibited from making additional copies or disseminating those documents in any way, and those persons must, under all circumstances, be added to the Insiders List and informed of all of the corresponding prohibitions and obligations.
  - d) Return or destruction of confidential documents: once the study of the

operation has ended because of cancellation, all persons with access to Inside Information must return or destroy all information to which they have gained access, whenever this is required by the Company's General Counsel based on a request from the third-party provider of that information.

- e) Responsibility: all persons with access to Inside Information are personally responsible for compliance with the safeguarding measures expressed above, without prejudice to any other general means of security that the Company's General Counsel may impose.
4. The Company's Corporate Investment Area must give special attention to monitoring the prices of the Securities. If any abnormal fluctuations occur in the prices of the Securities or their volume traded, then whenever there are reasonable signs that the oscillation is being produced as a result of premature disclosure, partial disclosure, or distorted disclosure of Inside Information, the Chair and Secretary of the Company's Board of Directors must be notified immediately.

The Company must immediately produce a notice to disclose the Inside Information, which must include a clear and precise information about the current status of the operation in progress, or that contains an advanced version of the information to be disclosed, all without prejudice to the requirements from the applicable laws and regulations on the subject of the possibility of delaying disclosure of Inside Information.

5. All Persons Subject to the Rules are prohibited from providing to analysts, shareholders, investors, or media sources any information with contents that could be considered as Inside Information or Other Relevant Information, unless it is also subject to prior or simultaneous disclosure to the market in general.

#### **Artículo 14º.- Market sounding**

1. Without prejudice to the contents of article 13 above, Inside Information may be disclosed to persons outside of the Group in the context of market sounding.
2. For these purposes, market sounding must be understood to mean disclosure of information to one or more potential investors, prior to announcement of an operation, if one exists, for the purpose of evaluating their interest in a potential operation and the conditions related to it, such as its potential price or volume, as performed by the Company or by a third party acting for or on behalf of the Company.
3. Whenever Inside Information is disclosed to persons outside of the Group in the context of market sounding, the safeguards and measures established by law must be implemented.

**SECTION VI.**  
**OPERATIONS WITH THE COMPANY'S OWN SECURITIES**

**Artículo 15º.- Operations with the Company's own Securities**

1. In general, all Operations with the Company's Own Securities must comply with the laws and regulations in force and the resolutions passed on the subject by the General Shareholders' Meeting, and they must always have legitimate purposes, such as: (i) contributing to the liquidity of those Securities on the market and/or reducing their price fluctuations; (ii) executing share buyback programs approved by the General Shareholders' Meeting or Board of Directors; and (iii) fulfilling previously contracted, legitimate commitments. In no case may they be used to disturb the open process of price formation in the market or to favor specific shareholders or investors.
2. Treasury Stock Transactions cannot be carried out based on inside information.
3. The management of Treasury Stock Transactions will seek to maintain total transparency in relations with supervisors and market governing bodies. During any such operations performed, the Company must comply with all obligations and requirements imposed by the laws and regulations in force at any given time.
4. As the area responsible for carrying out Treasury Stock Transactions, the Corporate Investment Area shall assume the following functions:
  - a) Managing the portfolio of own Securities in the manner established in this Article and in the applicable laws and regulations.
  - b) Monitoring the performance of the Company's shares on the markets.
  - c) Keep a daily record of the Treasury Stock Transactions carried out.
  - d) Periodically reporting to the Audit Committee with regard to the Transactions with Own Securities.

**APPENDIX****FORM FOR NOTIFYING THE GENERAL COUNSEL OF MAPFRE S.A. ABOUT  
TRANSACTIONS WITH SECURITIES**

DECLARANT: \_\_\_\_\_

POSITION AND COMPANY: \_\_\_\_\_

ISSUING COMPANY OF THE SECURITIES: \_\_\_\_\_

<b>TRANSACTIONS TO BE DECLARED</b>					
Date	Direct Holder <sup>1</sup>	Types of Securities <sup>2</sup>	Type of Operation <sup>3</sup>	Number of securities	Price per unit

<b>BALANCE TO DATE (STATUS AFTER TRANSACTION)</b>				
Date	Direct Holder <sup>1</sup>	Types of securities	Number of securities	Euros

<sup>1</sup> 1. Declarant or Person Closely Associated (spouse, child, etc.).<sup>2</sup> 2. Shares, subscription rights, convertible bonds, etc.<sup>3</sup> 3. Buying, selling, etc.



**PERSONAL DATA PROTECTION**

The personal information and/or data provided on this document, including any international communications or transfers of that information that may occur, will be processed by MAPFRE S.A. for the purposes described in the **“Additional Information on Data Protection”** ([https://www.mapfre.es/seguros/privacidad/comunicacionCompras\\_2capa.pdf](https://www.mapfre.es/seguros/privacidad/comunicacionCompras_2capa.pdf))

If the data provided refer to natural persons other than yourself, those people must have been duly informed and their consent obtained for the disclosure of their data prior to said disclosure under the terms of this clause and the **“Additional Information on Data Protection.”**

In addition, if you are providing any data related to minors as their parent or guardian, you are expressly granting consent for processing of their data for the purposes described in the **“Additional Information on Data Protection”**.

Basic Information on Data Protection	
Data controller	MAPFRE S.A.
Purposes	- To monitor operations involving securities and performed by senior management/representatives or external advisors of companies from the MAPFRE Group, or by their persons closely associated.  - Comprehensive and centralized management of your relationship with the MAPFRE Group.
Legal basis	Compliance with legal obligations and legitimate interest.
Recipients	Data may be disclosed to third parties and/or transferred to third countries under the terms specified in the <b>Additional Information on Data Protection.</b>
Rights	Users may exercise their rights of access, rectification, deletion, restriction, objection, and portability, as detailed in the <b>Additional Information on Data Protection.</b>



I have read and I accept the terms of this clause.

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*Internal Rules of Conduct Regarding Securities Issued by MAPFRE*