

ENGLISH VERSION

Engagement Policy

MAPFRE ASSET MANAGEMENT, SGIIC, SA

1. Introduction

Effective and sustainable shareholder engagement is one of the cornerstones of the corporate governance model, and greater engagement is an instrument to improve corporate financial and non-financial performance, as well as environmental, social and governance factors.

In this context, Directive (EU) 2017/828 of the Council of the European Parliament and of the Council of May 17th, 2017, amending Directive 2007/36/EC as regards the encouragement of long-term shareholder engagement (hereinafter referred to as the "Directive"), aims to ensure transparency of asset managers and institutional investors in relation to their investment strategies and their engagement with the companies in which they invest; said investments being admitted to trading on a regulated market located or operating in a Member State of the European Union.

To meet the applicable regulatory requirements and contribute to the objectives established by legislators, MAPFRE ASSET MANAGEMENT, SGIIC, S.A. (hereinafter, "MAPFRE AM" or the company) has drawn up this long-term shareholder engagement policy (hereinafter, the "Engagement Policy" or the "Policy").

The principles described in this policy represent general guidelines in matters of corporate governance and long-term shareholder engagement and will be applied to all collective investment institutions (hereinafter, "CII") and to the discretionary portfolios managed by MAPFRE AM.

With this, the MAPFRE Group is taking another step in its Sustainability philosophy (previously called Corporate Social Responsibility) and its commitment to the Sustainable Development Goals.

2. Scope of Application

This Policy and, where applicable, its implementing regulations, are mandatory for all MAPFRE AM directors, managers, and employees, who must be aware of and comply with the provisions thereof.

In addition to all CII and MAPFRE AM discretionary portfolios this "Engagement Policy" will also apply to occupational pension funds that, having contracted asset management with MAPFRE AM, their respective Control Committees have accepted the aforementioned "Policy" and have entrusted the exercise of voting rights to the company.

3. Engagement Policy Principles

In preparing the Policy, the spirit of the United Nations Principles for Responsible Investment (UN PRI), of which MAPFRE, S.A. is a signatory, was taken into consideration.

As a general principle, MAPFRE AM's investment management is based on:

- Putting the interests of Clients above any other consideration.
- Creating long-term value by choosing to invest in companies that share this approach.

The application of Environmental, Social, and Corporate Governance criteria (hereinafter, "ESG") is essential in the implementation of both principles. Thus, sustainable investment criteria are not only considered but are also a key part of the decision-making process at MAPFRE AM.

3.1. Monitoring of Investee Companies

MAPFRE AM continuously monitors the Assets in which it invests with a detailed analysis of both financial and extra-financial factors, including ESG among the latter.

To carry out such monitoring, all information published by the company, relevant facts, regular reporting, shareholders' meeting announcements, as well as other accessible external information such as news covered by the press or reports from financial analysts and information providers are considered. In addition, consideration is given to MAPFRE AM's own knowledge of companies, and the knowledge it acquires through active dialog with these companies and other forms of relationship.

3.2. Relationship with Investee Companies

To strengthen the good corporate governance of the companies in which it invests, improve their financial and extra-financial performance, and resolve potential disputes that may arise regarding ESG aspects, MAPFRE AM will promote constructive dialog through regular contact with companies.

3.3. Exercise of Voting Rights

In accordance with the rules applicable to the CIIs, MAPFRE AM shall exercise all the rights concomitant with securities for the exclusive benefit of the shareholders, in particular, the right to attend and vote at shareholders' meetings. MAPFRE AM also extends this approach to all those Client portfolios managed by MAPFRE AM by delegation.

This way, MAPFRE AM will exercise the attendance and voting rights at the shareholders' meetings of the companies in which MAPFRE AM has invested on behalf of the CIIs and their clients.

The right to vote shall be exercised on a consistent and cross-cutting basis, without prejudice to the necessary flexibility, and there may be exceptions to be assessed on a case-by-case basis.

The foregoing shall apply unless there are grounds for not exercising such rights and this is reported in the annual reporting published by MAPFRE AM on how it has implemented this Policy.

MAPFRE AM has a policy for exercising voting rights approved at the meeting of the Board of Directors of the company, held on July 14th, 2020, which is included herein as **Appendix I**.

3.4. Managing Conflicts of Interest in Engagement Activities

MAPFRE AM has a Conflict of Interest Policy to which all its directors, managers, and employees are bound to follow during their activity. This Policy (included herein as **Appendix II**) is relevant to the management of any conflicts of interest that may arise in the exercise of voting rights at the companies in which MAPFRE AM has invested.

3.5. Justification for Non-Compliance

If MAPFRE AM decides not to comply with one or more of the requirements set out above, it shall publish a clear and reasoned explanation of the reasons for not doing so.

Additionally, this will be reported in the annual report published by MAPFRE AM on how it has implemented this Policy.

4. Publication of the Policy

This document shall be available to the public at <https://www.mapfre.es/seguros/mis-ahorros/ahorro-inversion/mapfre-inversion-2.jsp>.

On an annual basis, MAPFRE AM shall publish on that website information on how this Policy has been implemented, including at least a general description of its conduct in relation to voting rights, an explanation of the most important votes and where appropriate, recourse to the services of proxy advisers.

5. Approval and Review of the Policy

This Policy will be approved by the MAPFRE AM Board of Directors.

This Policy will be reviewed at least once a year by the Regulatory Compliance Unit and whenever situations arise that substantially modify its nature or structure.

If at any time this Policy is substantially amended, the Board of Directors shall be informed of this for approval. Regardless of whether or not there substantial amendments are made, updates to this Policy will be subject to ratification by the Board of Directors or the body to which this function has been delegated.

APPENDIX I: VOTING POLICY

1. Regulatory framework and scope of application

International initiatives aimed at encouraging institutional investors' engagement in the affairs of the companies they invest in to foster their participation in the good corporate governance of their investees have resulted in a series of regulations (including Directive 2017/828 of the European Parliament and of the Council of 17 May 2017) that directly affect the activities of MAPFRE ASSET MANAGEMENT, SGIIC, S.A. (the Company).

The Company has approved this Policy, which scope is the exercise of voting rights by any of its customers (both the collective investment institutions whose assets are managed by the Company and individual entities with which it has entered into discretionary portfolio management arrangements), irrespective of the countries where investments have been made.

This is yet another step forward on the path of Corporate Social Responsibility, which more recently has come to be known as Sustainability. MAPFRE started down this path on 10 June 1965, when this concept was first unveiled in its Articles of Association.

2. General principles

The measures and procedures to be implemented by asset management companies include monitoring corporate activities and ensuring that voting rights are exercised in consonance with its clients' goals and with the investment policies arranged with them, enabling as well any voting-related conflicts of interest to be suitably handled.

Active involvement in the decisions taken by the AGMs of the companies included in its clients' portfolios is implemented by exercising voting rights at those meetings and is an inherent part of the Company's management of its clients' investments.

As a general principle, voting at AGMs by MAPFRE AM will be imbued with the spirit of the Principles for Responsible Investment (PRIs), which MAPFRE has signed.

Two of the fundamental principles guiding investment management by MAPFRE AM have been instrumental when drawing up this policy:

V. Placing clients' interests above all other considerations.

VI. Creating long-term value, and when investing choosing companies that share our approach to long-term value creation.

Adhering to Environmental, Social, and Governance (ESG) criteria is basic to putting both these principles into practice. Accordingly, not only are sustainable investment criteria followed, they are an essential component of the management company's decision-making process and the Risk Committee's subsequent review of those decisions.

Voting rights will be exercised in accordance with standard, consistent criteria, though allowing for the requisite flexibility and possible exceptions, to be assessed on a case-by-case basis and ratified by the Risk Committee.

Voting rights may be exercised remotely or by attending to the Annual General Meetings in person. Voting rights may be exercised remotely by either of two mechanisms:

1. By means of the attendance card for the AGM issued by the depositary. Cards will be returned to the company when they have been marked with the votes cast, decided in accordance with this policy, and have been signed by the managers. The companies will be asked to certify that the right to vote has been exercised and how the votes were cast.
2. By using a service provider that will keep a record that voting was exercised and of how the votes were cast.

3. Management of Conflict of Interest

MAPFRE AM's activity as an investment manager does not predispose it to prospective conflicts of interest when voting at General Meetings.

The Company has a Conflict of Interest Policy in place, and all its employees (especially the employees that manage investments) are required to be familiar with that policy and to comply with it in the performance of their duties. Specific procedures for averting and/or properly managing conflicts of interest exist, and they prescribe how the Company and the persons concerned will proceed, how conflicts are monitored, and reporting to management.

The principles on which MAPFRE AM's Conflict of Interest Policy are based bear closely on the exercise of voting rights by investment managers and include:

- (xi) The clients' interests will prevail over those of the Company in all cases.
- (xii) Should a conflict of interest that cannot be suitably managed arise, the underlying situation will be circumvented or clients will be informed so that they may take the appropriate decisions.
- (xiii) Voting rights afforded by certain mechanisms will be exercised solely on behalf of the CIIs and their share or unit holders. For other clients, the provisions of the agreements signed with those clients will apply, and whatever actions are taken will in all cases be solely for the benefit of the client.
- (xiv) The Company is physically, hierarchically, and functionally separate from other entities in the MAPFRE Group, and information barriers are in place to prevent or control information exchanges. Separate areas have been erected to prevent the flow of privileged or non-public information among the entities in the MAPFRE Group.
- (xv) The Company has implemented measures to prevent or restrict the opportunity for someone to influence improperly how an Affected Person performs his or her portfolio management duties.

APPENDIX II: CONFLICT OF INTEREST POLICY

1. INTRODUCTION

Directive 2014/65, which regulates financial markets and their implementing and transposition legislation in Spain, imposes numerous investor protection obligations on entities providing investment services and, it establishes the need for companies providing investment services to adopt, implement, and maintain an effective conflict of interest policy. The prevention and management of these conflicts is also mandatory in the regulation applicable to CIIs, and Article 144 of the implementing regulation of the Law on Collective Investment Institutions requires the policies and procedures applicable to them, whereas Article 145 deals exclusively with conflicts of interest concomitant with related operations.

To comply with these obligations and with the clear objective of bolstering the protection of its clients, MAPFRE ASSET MANAGEMENT, SGIC, SA ("MAPFRE AM" or the "Company") developed this Conflict of Interest Policy (the "Policy" or the "Conflict of Interest Policy") whose objective is to constantly detect and update actual or potential conflicts of interest and prevent such situations from occurring or, if this is not possible, properly managing any conflicts of interest that may arise, in accordance with the provisions of the regulations in force with an internal registration and communication procedure.

The Policy is intended to:

- vi) Identify a list that does not claim to be exhaustive of any circumstances that, as a result of the activities set out in its program (in the field of management, administration, representation, and distribution of collective investment institutions (**CII**) and in relation to investment and/or ancillary services or a combination thereof) by or on behalf of MAPFRE AM, may represent a potential conflict of interest and therefore involve a risk of harm to the interests of one or more clients.
- vii) Take measures to ensure, to the greatest extent possible, that conflicts of interest do not actually arise.
- viii) Specify the procedures to be followed and the measures to be taken to manage conflict of interest.
- ix) Explain to clients where the measures put in place to prevent or manage conflicts of interest are insufficient to ensure, with reasonable certainty, the prevention of risks of damages to client interests.
- x) Properly document the internal measures established by the Company to meet the above purposes.

This Policy therefore includes the general principles of action to be followed in MAPFRE AM in relation to conflicts of interest that may arise in the provision of all the Company's services and its activities, without prejudice to the provisions of the Policy on the Management of Conflicts of Interest and Related Transactions with Significant Shareholders and Senior Representation and Management Positions of the MAPFRE Group, to which the Company adheres, as well as in the Code of Ethics and Conduct (hereinafter, the "**Code**") and in the MAPFRE Internal Rules of Conduct with regard to listed securities, and in the Company's own Internal Rules of Conduct ("**IRC**").

2. SCOPE OF APPLICATION

This Policy and its implementing rules are mandatory for all directors, managers, employees, agents, and any parties directly or indirectly related to them, as defined below ("**Related Parties**") (jointly, "**Concerned Parties**"), who shall know and comply with this Policy.

Related Parties Shall Mean:

- v) Legal persons that are linked by control to the directors, managers, and employees of the Company, or the Company itself, and any individuals who have a personal relationship with them.

For these purposes, the following shall be considered links by control:

- 3) Directly or indirectly holding 20 percent or more of the voting or capital rights of a company; or
- 4) A link by control in the terms of Article 4 of the Stock Market Act (LMV).

Likewise, kinship relations with the following people will be considered personal ties:

- 4) The spouse or any person linked to them by an analogous emotional relationship, as per current legislation.
- 5) The children or stepchildren in their care.
- 6) Other relatives who have been living with them for at least one year prior to the date of the personal transaction in question.

- vi) Depository institutions of vehicles managed by the Company.
- vii) Any group entity to which the Company belongs, the depository institution, any of the members of their respective boards of directors, any other managers or custodians belonging to the same group.
- viii) Entities that share members of management bodies (with executive or non-executive positions, provided that such persons participate in or influence decision-making that may potentially generate a conflict) with the Company².

This Policy shall apply to CII management, administration, representation, and distribution, in relation to investment and/or ancillary services provided by MAPFRE AM, and any combination thereof.

What is provided here should be considered in conjunction with other internal policies and guidelines to be published for this purpose, which are intended to elaborate on the procedures, content, or resources enabled to comply with the obligations set out in this Policy.

3. DEFINITION OF CONFLICT OF INTEREST

A conflict of interest shall be deemed to exist:

- vi) between the company and its clients
- vii) between a Concerned Party and the company or its clients
- viii) between clients for the provision of an investment service
- ix) between one of its clients for the provision of an investment service and a CII

² For example, according to the approach applied by the ESMA in the Market Abuse Regulation, it is considered that there is no conflict of interest when the members of the Company's management body do not participate or influence decision-making relating to transactions with financial instruments of the other company of which they are also members of the management body.

- x) between two CII

where, for the same Concerned Party or area of decision, two conflicting interests could compromise the unbiased provision of a service (in management, administration, representation, and distribution of CII, in relation to investment and/or ancillary services, or a combination thereof) and where a risk of harming the interests of the client, the managed CII, or investors in those CII is identified.

The following is a non-exhaustive list of circumstances or situations in which, for the purposes of this Policy, there may be a conflict of interest:

- xi) When a financial advantage can be obtained, or a financial loss avoided, at the expense of the client, the CII, or its investors.
- xii) When the outcome of an activity or service provided to the CII, its investors, or another client, or the outcome of a transaction carried out on behalf of the CII or another client is conferred an interest other than said parties'.
- xiii) When there is an incentive, financial or otherwise, to favor:
 - The interests of a CII, client or group of clients over the interests of another CII or client.
 - The interests of one investor over the interests of another investor or group of investors in the same CII.
- xiv) When a transaction is carried out on the same asset for two CII or for another client.
- xv) When an incentive, in the form of money, goods, or services, other than the regular fee or commission established for such service, is received, or will be received from a person other than the CII or its investors or the client, as appropriate; this includes, the receipt or payment of fees, commissions, or non-monetary profits of third parties by the Company or any Concerned Party in connection with the provision of investment services.
- xvi) When all or part of an investor's portfolio is invested in CII units or shareholdings managed by the Company.
- xvii) Situations in which the Company or any Concerned Party may carry out the same activity as the client and may clash with them.
- xviii) The remuneration of the Company and the Concerned Parties and other employee remuneration structures.
- xix) In the exchange of information between Concerned Parties who participate in the preparation of advertising communications when the exchange of that information may be detrimental to the interests of one or more clients.
- xx) Any other circumstance which may arise at the time of the provision of an investment or ancillary service involving a risk of damaging the interests of the client.

For these purposes, it will not be considered sufficient that the Company, the Concerned Party, or person with a direct or indirect link by control with the Company may receive a benefit, if there is not also a possible harm to a client, or that a client may make a profit or avoid a loss if there is no possibility of loss for another client.

4. IDENTIFICATION AND MANAGEMENT OF CONFLICTS OF INTEREST

MAPFRE AM has procedures in place to avoid and/or properly manage conflicts of interest that determine how the Company and the Concerned Parties will act in those situations, monitor them, and report them to management, based on the following general principles:

- xvi) The interest of the CII, their shareholders, mutual fund shareholders, and clients will always prevail over that of the Company, the Concerned Parties. The Company has an internal procedure whose objective is to ensure that related operations that may be carried out by or for the CII or the corresponding clients or entities, are carried out in the best interest of the CII or clients at market prices.
- xvii) In the event of a conflict of interest that cannot be properly managed, the situation giving rise to such conflict of interest shall be avoided or disclosed to the CII, its shareholders, mutual fund shareholders, and/or clients, so that they can make the appropriate decision.
- xviii) Financial instruments are selected once their suitability and adaptation to the investment policy of the CII or the contract formalized with the client, as appropriate, is confirmed and their different risks have been analyzed. They are continuously monitored for the duration of the investment period.
- xix) The voting rights granted by certain instruments are exercised for the exclusive benefit of the CII and their shareholders or mutual fund shareholders. In the case of other types of clients, the provisions of the contracts signed with them shall be fulfilled and, in any case, actions shall be for the client's exclusive benefit.
- xx) When selecting third-party funds, if any, the types with the cheapest conditions to which the CII and/or clients can access are always chosen.
- xxi) The process of pre-allocating and contracting transactions takes place within a formalized and controlled framework with separation of the different roles involved, respecting the interests of each client group, and avoiding discrimination.
- xxii) Financial intermediaries are selected according to unbiased and independent criteria.
- xxiii) Any direct relationship between the remuneration of Concerned Parties mainly engaged in one activity and the remuneration of other Concerned Parties mainly engaged in another activity, or the revenue generated by them, has been removed, where a conflict of interest may arise in connection to those activities.
- xxiv) There is a functional, hierarchical, and physical separation of the Company from other MAPFRE Group entities, with information barriers preventing or controlling the exchange of information; as well as separate areas to prevent the flow of privileged or non-public information between MAPFRE Group entities.
- xxv) The Company has adopted measures to prevent or limit any person from exercising undue influence over the way in which a Concerned Party carries out portfolio management activities.
- xxvi) The Company has implemented measures to control the simultaneous or consecutive participation of a Concerned Party in separate management activities. Where such participation may affect the proper management of any conflict of interest, appropriate measures shall be taken.
- xxvii) As a result of the link between the Company and the custodian of the CII, there are procedures to ensure the identification of conflicts of interest arising from such a link, and the adoption of all reasonable measures to prevent such conflict.

Where conflict of interest cannot be avoided, the two entities shall monitor and disclose said conflict to prevent adverse effects to the interests of the CII and their investors.

- xxviii) Incentives paid or received from third parties. The Company has procedures in place to verify that it does not accept or withhold fees, commissions, or other monetary or non-monetary profits paid or provided by a third party or a person acting on behalf of a third party in connection with the provision of the discretionary portfolio management service to its clients.

If the Company receives fees, commissions, or other monetary or non-monetary profits, these should be returned in full to the client as soon as possible, upon receipt of the payments in question. The Company is not authorized to compensate said third party payments with fees to the Company adjusted for the client.

- xxix) Potential conflicts in the case of provision of investment and/or ancillary services. The analysis and, where appropriate, identification and management of potential conflicts of interest in the provision of these services shall be carried out at the following levels:

- The internal procedure for the approval of products and services of the Company, sets out the need to analyze potential conflicts of interest that may arise between the Company and the client, the CII, or its investors, or between clients, CII, and their investors.

In the event that, during the product and service approval process, it is concluded that there may be a potential conflict, appropriate measures shall be taken to properly manage the potential conflict and, if the product is approved, appropriate measures shall be indicated to minimize its effects, and the warnings to be given in the distribution process and statements to be requested from the client in the distribution process shall be established in cases where the measures taken cannot prevent the existence of potential harm to clients.

- When providing investment and/or auxiliary services, the Concerned Parties shall analyze whether there is any situation in which a potential conflict of interest may arise, other than those that have been previously identified by the Company, and if so, comply with the measures provided for in this Policy.

On the other hand, in the case of specific acts of provision of such services, those providing said services must analyze whether there is a situation arising from subjective, objective, or other concurrent circumstances determining that, although there is no general conflict vis-à-vis the service, there is a specific one.

- xxx) Advertising communications. In the making of advertising communications or, when commissioning advertising communications to third parties intended to be disseminated or which could be disseminated to clients or to the public, the Company shall ensure the following measures to prevent conflicts of interest:

- Prevent the exchange of information between Concerned Parties who participate in the preparation of advertising communications when the exchange of that information may be detrimental to the interests of one or more clients.
- Where the Company makes advertising communications to clients with competing interests, decisions on such communications shall be made separately to avoid the damages that could arise from the existence of a potential conflict of interest.
- Remove any direct relationship between the remuneration of Concerned Parties primarily engaged in advertising communications and the remuneration

of other relevant persons primarily engaged in another activity, or the revenue generated by them, where a conflict of interest may arise.

- Prevent or limit inappropriate influence on the way in which a Concerned Party prepares advertising communications.

To this end, "advertising communication" means information recommending or suggesting an investment strategy, either explicitly or implicitly, in relation to one or more financial instruments or their issuers, including any opinion on the present or future value or price of such instruments, intended for distribution channels or the public, which meets the following conditions: (i) the information does not correspond to the name or description of the investment report or similar terms, or in any case is not presented as an unbiased or independent explanation of the subject matter of the recommendation; (ii) if the information is provided to a client, it does not constitute the provision of investment advice and (iii) it is clearly identified as advertising communications, advertising activity, commercial communication, or the like.

5. APPLICABLE CRITERIA IN CONFLICT OF INTEREST

5.1. GENERAL RULES

In relation to the above guidelines on conflicts of interest, the following implementation rules shall apply:

- Independence: Concerned Parties must always act with freedom of judgment, with loyalty to the Company, its shareholders, and clients independently of their own interests or those of Related Parties. According to this principle, the Company controls and prevents the simultaneous or consecutive participation of a Party in different investment or auxiliary services or activities where such participation may be detrimental to the proper management of conflict of interest.
- Abstention: Concerned Parties must refrain from intervening or influencing decision-making that could affect persons or entities with which there is a conflict of interest and accessing relevant information affecting this conflict. Therefore, the possibility for any person to exert inappropriate influence on the way a Concerned Party carries out investment or ancillary services or activities will be prevented and restricted.
- Communication: Concerned Parties must inform the Company's Regulatory Compliance Unit of conflicts of interest in which they are involved due to activities outside the Company, family relations, personal assets, or for any other reason.
- Transparency: Prior to the completion of any transaction, clients must be informed of any economic or other links that might involve a conflict of interest with them.
- Disclosure: If the conflict cannot be avoided in accordance with the above rule, prior to the provision of the investment service that is subject to a conflict of interest, the client concerned shall be appropriately informed, including:
 - Providing them with sufficient information in relation to said conflict on a durable medium. The information shall include:
 - Specific description of the conflict, which shall contain an explanation of the general nature and origin of the conflict, as well as the risks to the client.

- The organizational and administrative measures undertaken to manage and mitigate conflict of interest.
 - Confirmation that such measures were insufficient to reasonably certainly ensure that risks of damages to the interests of the client are prevented.
- The above information should be provided in sufficient detail, considering the nature of the client, so as to ensure that the client can make an informed decision on whether or not to continue the service in question. In some cases, it will be advisable that, in case the client wishes to continue with the provision of the service, we request in writing their express statement that they have been duly informed of the conflict of interest, and that they agree to go ahead with the provision of the service.

The disclosure of conflicts of interest to clients shall be made where there is no reasonable certainty that the organizational or administrative measures taken to prevent conflict of interest from damaging the interests of clients are sufficient to ensure their prevention with reasonable confidence.

5.2. SPECIFIC RULES:

The following specific rules should be considered in the light of possible types of conflicts of interest that may arise in the Company's business, including, among others, the following:

- iv) Conflicts of interest between clients:
 - Under no circumstances should the execution of a transaction by one client be encouraged to benefit another unless both know their different positions and expressly agree to perform the transaction.
 - Clients should be informed of any financial or other links that might involve a conflict of interest with them.
- v) Conflicts of interest between the Company and its clients:
 - No special treatment or conditions should be given to clients or and others should not be pressured to do so based on personal, family, or other relationships.
 - The exclusive relationship with a client that could give rise to an excessive personal relationship or restrict the access of the same to other employees or channels of the Group, shall be avoided.
- vi) Conflicts of interest between the Group and its employees

The employees of the Company must always act in such a way that their individual interests, or those of their Related Parties, do not take precedence over those of the Group or its clients. In this regard:

- Operations of any kind in which employees or their Related Parties are identified as beneficiaries or guarantors may not be approved, intervened, or otherwise influenced.
- No payment, commission, gift, invitation, or remuneration may be requested or accepted from clients, suppliers, intermediaries, counterparties, or any other third party for operations carried out by the Group. They may not otherwise obtain the benefit of the position held in the Group for self-profit.

- Professional services may not be provided to other competing entities or companies, regardless of whether they are remunerated, unless expressly authorized by the human resources and compliance units, and by the person in charge of the area concerned.

To assess the possible existence of conflicts of interest with respect to employees, the Regulatory Compliance Unit may request from employees or Related Parties recent personal or professional data or circumstances that may influence the performance of their professional and decision-making functions, such as:

- Employee financial interests that may pose a conflict of interest with the Group
- Personal or professional relationships with shareholders with significant holdings in the Group
- Personal or professional relationships with Group executives
- Professional activities on their own account or at companies outside the Group
- Personal or professional relationships with the Group's main business partners, third parties, and suppliers
- Public or authority positions within a public agency

In any case, employees shall be responsible for communicating without delay any situation that may affect their personal or professional circumstances and may pose a possible conflict of interest with the Group to their direct manager and the Human Resources and Regulatory Compliance Units.

6. PROCEDURE FOR DEALING WITH POTENTIAL CONFLICTS OF INTEREST

To properly manage any conflicts of interest that may take place between the Company (or Concerned Parties) and the clients, the CIIs and their investors or between the clients, CIIs or their investors among themselves, MAPFRE AM has the following specific action procedures:

- iii) Conflicts of interest must be resolved by the person in charge of the affected area, who will make the corresponding decision on the conflict raised. If the conflict of interest occurs between two areas, it will be resolved by the hierarchical superior who manages both affected areas.

Where necessary, the matter will be referred to the Company's Regulatory Compliance Unit, which will rely on the support of other functions to decide on the matter.

In any event, once the existence of a conflict is established:

- Measures will be implemented to prevent or, where appropriate, manage the conflict by the competent body, observing the guidelines set out in this Policy.
- Appropriate communications shall be made to clients provided that the conflict cannot be avoided and managed, and it results in damages or prejudice to the interests of a client. The Company may only perform the services or operations where there is a conflict of interest when the clients expressly consent to them, and the excessive use of disclosure of conflict of interest shall be considered a deficiency of this Policy.
- iv) The provisions of the preceding paragraph are without prejudice to the special rules provided for in the event of a conflict affecting other specific situations set out in the Code, the MAPFRE Internal Rules of Conduct concerning listed securities, or the IRC.

7. CONFLICT OF INTEREST LOGBOOK

The Company shall maintain and regularly update a logbook of all situations (in CII management, administration, and representation, in relation to investment and/or ancillary services, or a combination thereof) where a conflict of interest has arisen, entailing a potential risk to the interests of one or more clients, a CII and its investors, or, in the case a conflict of interest may arise during an ongoing activity.

The said logbook shall specify the procedures and measures adopted in relation to potential conflicts of interest, and the Compliance Unit is responsible for maintaining such logbook.

The Board of Directors of the Manager will frequently, at least annually, receive notice of situations in which a conflict of interest has arisen within the reports prepared by the Compliance Unit on the degree of compliance with this policy, or, in the case of an ongoing activity, situations where such a conflict may arise but has not been adequately resolved and may lead to a conflict of interest detrimental to the client, the CII, or their investors.

The Conflict of Interest Logbook shall be maintained for a minimum period of five (5) years from the time the conflict of interest or potential conflict of interest is identified; any changes made to it must also be kept for the same period.

8. APPROVAL AND REVIEW OF THE POLICY

This Policy shall be approved by the Board of Directors of MAPFRE AM and enter into force on November 1st, 2018.

This Policy will be reviewed at least once a year by the Regulatory Compliance Unit and whenever situations arise that substantially modify its nature or structure.

If at any time this Policy is substantially amended, the Board of Directors shall be informed of this for approval. Regardless of whether or not there has been a substantial change, a review of this Policy will be conducted annually, updating it if necessary for approval or ratification by the Board of Directors.