

An aerial photograph of a two-lane road with a yellow center line, flanked by dense green trees. A red car is driving on the road. A large, bold white number '4' is overlaid on the right side of the image.

# 4

## Consolidated Non-Financial Information Statement and Sustainability Report

**2025**

# Consolidated Non-Financial Information Statement and Sustainability Report 2025

LINEA DIRECTA ASEGURADORA S.A.

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# GENERAL DISCLOSURES (ESRS 2)

## Basis for preparation

### BP-1. General bases for the preparation of the Consolidated Non-Financial Information Statement and information on Sustainability.

#### Consolidated Non-Financial Information Statement and Sustainability Report.

The Línea Directa Group presents in the **Consolidated Non-Financial Information Statement and Sustainability Report** the information necessary to understand how environmental, social and corporate governance issues affect the development, results and position of the Group, identifying and disclosing for this purpose all those impacts, risks and opportunities of relative importance to the entity in relation to the different areas of sustainability.

This 2025 Sustainability Report of the Línea Directa Group has been prepared in accordance with **Directive (EU) 2022/2464** of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards sustainability reporting by companies. It is also based on the provisions of **Commission Delegated Regulation (EU) 2023/2772** of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards.

In addition, consideration has been given to **Directive (EU) 2025/794** of the European Parliament and of the Council of 14 April 2025 amending Directives (EU) 2022/2464 and (EU) 2024/1760 as regards the dates from which Member States must apply certain sustainability reporting and due diligence requirements by companies, known as the “**Stop the Clock**” Directive; and Commission Delegated Regulation (EU) of 11 July 2025 amending **Delegated Regulation (EU) 2023/2772** as regards the postponement of the application date of disclosure requirements for certain companies, “**Quick Fix**”.

The selection of the content included in this report is based on the prior analysis of the required **Double Materiality**, which has allowed Línea Directa Group to identify and understand which issues are most relevant to its Stakeholders and thus be able to respond to their needs and take advantage of the opportunities that arise from this new environment.

In 2025, the Línea Directa Group consulted the Sustainability Working Group to reassess the impacts, risks, and opportunities identified in the previous year, submitting the results to the Sustainability Committee in November. The outcome of this reassessment and analysis determines the plans and strategies for managing each of the material issues identified, with the aim of improving the Group's **environmental, social, and corporate governance** performance in the short-, medium-, and long-term.

For this exercise, the Group used internal sources of information, such as the **TCFD Climate Report**, published in 2025 with information relating to 2024, the **2023-2025 Sustainability Plan**, the risk map, and various Group policies. This analysis also draws on external sources to align the project and methodology with European requirements and to include relevant information from analysts and other important sources. Among others, the sustainability reporting frameworks of the **Global Reporting Initiative (GRI)** and the **European Financial Reporting Advisory Group (EFRAG)** were used.

During the 2025 fiscal year, the Group developed the **2026-2028 Sustainability Plan**, which was submitted to the Appointments and Remuneration Committee for review in December and subsequently approved by the Board of Directors. This Plan, aligned with the company's strategy, will define the Group's sustainability initiatives for the next three years.

The Línea Directa Group also takes into account other international standards and regulations when reporting information on specific aspects, such as sustainable finance and carbon footprint, which are detailed throughout this document in the corresponding sections. In conclusion, this report is guided by the principles of transparency, accuracy, balance, clarity, comparability, comprehensiveness, sustainability context, timeliness, and verifiability.

The scope of this consolidated Sustainability Report includes information from Línea Directa Aseguradora S.A. Compañía de Seguros y Reaseguros (the Parent Company) and all its subsidiaries (the Group): Línea Directa Asistencia, S.L.U., Centro Avanzado de Reparaciones (CAR), S.L.U., Ámbar Medline, S.L.U., LDActivos, S.L.U.

In the context of Línea Directa, the integration of environmental, social, and governance criteria into the value chain is fundamental to identifying impacts, risks, and opportunities. Through a rigorous Double Materiality process, the material IROs (list of the 27 material impacts, risks, and opportunities from the Strategy chapter) have been assessed at each stage of the value chain.

- **Upstream**, the Group works with suppliers committed to sustainable practices, minimizing environmental and social risks.
- Within **internal operations**, a culture of ethical governance and social responsibility is promoted, which strengthens resilience and trust in the brand.
- **Downstream**, Línea Directa offers products that encourage sustainable behaviors among customers and invests in projects that generate a Positive impact on society and the environment.

This comprehensive strategy not only mitigates risks but also opens new market opportunities and improves the entity's long-term competitiveness. The details of the material impacts, risks, and opportunities, and their relationship to the value chain, are explained in greater depth throughout this report in the various thematic chapters.

In accordance with Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards, this Línea Directa Sustainability Report will omit specific information relating to intellectual property, know-how or innovation results that the Group considers sensitive from a strategic and/or commercial point of view, ensuring in all cases that the overall relevance of the disclosure is not compromised.

In this context, Línea Directa has not made use of the right to exemption from disclosure of imminent developments or issues under negotiation set out in Directive 2013/34/EU.

## **BP-2. Disclosures in relation to specific circumstances.**

With the aim of understanding the effect that specific circumstances may have on the correct identification and management of the impacts on the Group of certain impacts, risks and opportunities of relative importance in relation to environmental, social and corporate governance issues, the Línea Directa Group may use time horizons, estimates, sources of estimation and other specific circumstances that are detailed throughout this document in the corresponding headings.

## Time horizons.

In this regard, the Línea Directa Group uses time horizons different from those defined in Delegated Regulation (EU) 2023/2772 to identify the specific impacts, risks, and opportunities arising from climate change for the Group, and to establish a governance procedure, strategy, and associated metrics. The Group's expected trends and future projections for these phenomena are included in both its annual **Own Risk and Solvency Assessment (ORSA)** and its **TCFD Climate Report**, published in 2025 with information relating to 2024.

The use of these time horizons for assessing all risks and opportunities arising from climate change responds to the complexity of designing and evaluating long-term stress scenarios related to climate change, with impacts that must be assessed according to assumptions and over longer time horizons than those typically applied to financial risk assessment and strategic planning.

For the ORSA process, the time horizon of this exercise must coincide, according to Solvency II, with the medium-term financial planning horizon of insurance entities, which in the case of Línea Directa three years.

## Value chain estimation.

In order to gain a better understanding of the full extent of the impacts of all its activities, both its own operations and those of its suppliers and collaborators, and to advance the responsible management of its value chain, the Línea Directa Group is conducting an evaluation of its partner network, including a measurement of its environmental, social and governance performance.

In this regard, among the strategic lines of the **2023-2025 Sustainability Plan**, the entity has defined a series of initiatives aimed at deepening the knowledge of its value chain from a sustainability perspective, which will be expanded and reinforced in the lines of action of the next 2026-2028 Sustainability Plan.

In accordance with the **Responsible Procurement Policy**, in order to provide services or supply products to the Group, suppliers in the approval phase must carry out an initial evaluation in general aspects, which include ESG criteria.

During this process, the entity's Procurement Department, part of the Finance Area, obtains and evaluates commercial information published by each company from firms specializing in financial analysis. For suppliers classified as critical, the entity supplements this information with a more thorough assessment based on its own internal data.

Additionally, since 2023 the Group has been developing a questionnaire covering environmental, Human Rights, social, talent management, information security, and privacy aspects **to evaluate the ESG performance of its suppliers**. In 2025, the Group is working on revising the assessment model for 2026, with the aim of improving suppliers' ESG risk management and continuing to build a more sustainable and resilient supply chain.

On the other hand, and from the perspective of climate change management, Línea Directa has established a roadmap to analyze the climate risks and opportunities, both physical and transitional, identified in the short, medium and long term, and which affect both its operations and its value chain.

This roadmap outlines short- and medium-term energy consumption reduction targets for the Group, which are expected to have a direct impact on reducing emissions generated by such consumption. It also includes goals related to the climate impacts of the Group's value chain.

To this end, an emissions assessment of suppliers has already been carried out, which will serve to develop an initial diagnosis of the supply chain situation.

Furthermore, the 2023-2025 Sustainability Plan includes the calculation of the full scope 3, including all 15 categories following the **Greenhouse Gas Protocol (GHG Protocol)**, and from this, absolute and intermediate reduction targets will be established according to the **Science Based Targets initiative (SBTi)**, approving a route towards total decarbonisation by 2050.

In compliance with **Royal Decree 214/2025** of March 18, which creates the carbon footprint registry, remuneration and carbon dioxide absorption projects and establishes the obligation to calculate the carbon footprint and to prepare and publish greenhouse gas emission reduction plans, the Línea Directa Group presents as an Annex to this report its 2026-2030 Emission Reduction Plan, which breaks down the absolute and intermediate reduction targets aligned with the **Paris Agreement** and taking as a reference the Science Based Targets initiative (SBTi), setting a path towards total decarbonisation by 2050.

In this regard, the Group has begun by estimating the social cost of the impacts of its carbon footprint and its offer to support the transition to electric and hybrid vehicles.

To carry out the exercise, the International Carbon Price Floor (ICPF) established by the International Monetary Fund in its report "Proposal for an International Carbon Price Floor Among Large Emitters" was taken into account. In that document, published in June 2021, a price of \$75 per ton of carbon is estimated for high-income countries.

In this regard, it was estimated that the carbon footprint of Scope 1 and 2 emissions for the Línea Directa Group in 2025 represents a social impact of \$62,578, 0.35% less than in 2024. For Scope 3 emissions associated with the value chain, the impacts in 2025 were estimated at \$3.6 million, corresponding to a 6.4% decrease compared to the previous year.

On the other hand, the Línea Directa Group conducts a **Human Rights Due Diligence procedure** at least every three years to align with best practices in Human Rights and respond to the requirements of various ESG analysts. This procedure supports the measurement of the company's impacts on society, as regulated by Law 11/2018 on Non-Financial Information and Diversity. Due to the legal uncertainty surrounding European due diligence, Línea Directa has maintained its Human Rights impacts assessment procedure through 2025.

This procedure includes the identification of potential violations in this area based on the commitments made by the Group, which cover five dimensions of the entity: as an employer, as an insurer, as an investor, as a collaborator and partner, and in relation to its environment.

The identification of risk events is accompanied by the delimitation of negative impacts, real or potential, and defines the criteria to be considered to promote their evaluation, prioritization and management.

The risk event assessment process is based on Línea Directa Aseguradora's risk analysis methodology, ensuring consistency in criteria. Furthermore, the methodology defines how to evaluate the impacts, probability, and severity of each event.

This methodology serves as a basis for identifying potential risks in the field of Human Rights in operations and in the value chain, in business-related activities and in new commercial relationships, such as mergers, acquisitions or joint ventures.

The use of these indirect standard and reference sources ensures the appropriate level of accuracy to advance in the knowledge of the scope of the impacts of the activity of the operations of the Group's suppliers and collaborators set out in the Sustainability Plan.

Línea Directa values and considers the incorporation of measurement and information tools and systems that allow for expanding that knowledge.

### **Sources of estimation and outcome uncertainty.**

In the event that estimates are made for calculations of proprietary data, as well as contextual information and future scenarios, the source used will be indicated, thus complying with DP 11 on sources of estimation and uncertainty. Likewise, throughout the report, forward-looking information is provided, based on an analysis of the current context and its expected evolution (without committing to achieving these goals).

### **Changes in the preparation or presentation of sustainability information.**

The quantitative information and data in this report cover 2025 and the preceding year, allowing the reader to understand the evolution of the business and the Group's performance trend. Figures and facts relating to previous years are also included. Any errors or restatements in the calculations for 2024 will be indicated in a footnote under the corresponding heading.

### **Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements.**

In order to comply with Spanish legislation in force at the time of preparation of this report, the Línea Directa Group reports certain indicators on tax, employment and specific information of the entity and its value chain in accordance with the requirements of Law 11/2018 of 28 December 2018 which modifies the Commercial Code, the consolidated text of the Capital Companies Law approved by Royal Legislative Decree 1/2010, of 2 July, and Law 22/2015, of 20 July, on Auditing of Accounts, in matters of Non-Financial Information and diversity.

In cases where the Group bases its policies or management commitments on the European standardization system (e.g., ISO), this will be indicated in the corresponding heading, as well as in the public policy documents on the sustainability issues in question.

### **Incorporation by reference.**

Given the following list of material topics and their relationship to ESRS:

- Climate change mitigation and adaptation (ESRS E1 Climate change).
- Responsible marketing and customer satisfaction (ESRS S4 Consumers and end users).
- Safety, health and well-being of workers (ESRS S1 Own Personnel).
- Diversity, equity and inclusion (ESRS S1 Own workforce).
- Talent management and professional development (ESRS S1 Own workforce).
- Ethics, good governance and responsible culture (ESRSG1 Business conduct).
- Regulatory compliance (specific to Línea Directa Aseguradora).

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- Risk Management (specific to Línea Directa Aseguradora).
- Digitalisation and innovation (specific to Línea Directa Aseguradora).
- Design of ESG products (specific to Línea Directa Aseguradora).
- Investment with ESG criteria (specific to Línea Directa Aseguradora).
- Cybersecurity and data protection (specific to Línea Directa Aseguradora).

ESRS E2, E3, E4, E5, S2, and S3 have again been found to be non-material following the review of the Double Materiality analysis. Therefore, these standards will only require disclosure of information related to IRO-1 (Description of the processes for determining and evaluating material impacts, risks, and opportunities).

The DRs that continue as materials are the following:

- 1) The following ESRS 2 DRs have been reported: BP1, BP2, GOV-1, GOV-2, GOV-3, GOV-4, GOV-5, SBM-1, SBM-2, SBM-3, IRO-1 and IRO-2.
- 2) The following DRs have been reported from E1: E1 GOV-3, E1 SBM-3, E1 IRO-1, E1-2, E1-3, E1-4, E1-5, E1-6, E1-7, E1-8 and E1-9
- 3) The following DRs have been reported from S1: S1-SBM-2, S1-SBM-3, S1-1, S1-2, S1-3, S1-4, S1-5, S1-6, S1-7, S1-9, S1-10, S1-11, S1-12, S1-13, S1-15 and S1-17
- 4) The following DRs have been reported from S4: S4-SMB-2, S4-SBM-3, S4-1, S4-2, S4-3, S4-4, S4-5
- 5) From G1, the following DRs are reported: G1-GOV-1, G1-IRO-1 and G1-1.

## Governance

### GOV-1. The role of the administrative, management and supervisory bodies.

#### Composition and diversity of the Board of Directors.

The composition of the **Board of Directors** of Línea Directa Aseguradora S.A. at the close of the 2025 budget year was as follows:

- An Executive Advisor:
  - **Ms. Patricia Ayuela de Rueda**, Chief Executive Officer.
- Seven non-executive directors:
  - Two Proprietary Directors.
    - **Mr. Alfonso Botín-Sanz de Sautuola y Naveda**, Chairman.
    - **Mr. Fernando Masaveu Herrero**, Director.
  - Five Independent Directors.
    - **Ms. Rita Estévez Luaña**, Director and Chairwoman of the Audit and Compliance Committee.
    - **Ms. Ana María Plaza Arregui**, Board Member and Chairwoman of the Appointments, Remuneration and Corporate Governance Committee.
    - **Mr. John de Zulueta Greenebaum**, Director.
    - **Ms. Marina Specht Blum**, Director.
    - **Mr. Iñaki Berenguer Mediavilla**, Director.

Sadly, Mr. John de Zulueta Greenebaum passed away in January 2026, as reported to the CNMV (Spanish National Securities Market Commission). The company's governing bodies will adopt the necessary resolutions regarding the existing vacancy.

In 2025, the Board demonstrates a strong commitment to gender diversity, with **50% female representation**. It consisted of eight directors: five independent, two proprietary, and one executive. At year-end, **62.5% of the non-executive directors** were **independent**, reinforcing their objectivity in decision-making. The Board's composition and the professional profiles of its members can be found on the company website.

|                                            |                                                                                                |
|--------------------------------------------|------------------------------------------------------------------------------------------------|
| <b>Percentage of independent directors</b> | 62%                                                                                            |
| <b>Percentage of women*</b>                | 50% on the Board<br>Membership in the Ibex Gender Equality Index<br>50% in the Management Team |
| <b>Skills matrix</b>                       | Yes                                                                                            |
| <b>Nationalities</b>                       | Three                                                                                          |
| <b>Average age</b>                         | 58 (From 49 to 78 years old)                                                                   |

\*50% of the Board is made up of women, including the Executive Director.

In Spain, the representation of workers on the Board of Directors is not provided for in the applicable regulations, it is not a legal requirement, nor a recommendation of the supervisor authority.

All members of the Board have experience and/or training in the insurance industry, as can be seen in the summary of their professional careers published on the corporate website and in the Annual Corporate Governance Report, as well as in the skills matrix published by the Group.

The **Fitness and Propriety Policy** summarises the requirements that directors must meet in accordance with the regulations applicable to insurance and reinsurance companies, including adequate knowledge and experience, particularly in the areas of insurance and financial services.

The **Board of Directors Selection Policy** stipulates that, collectively, members must possess knowledge and professional experience in the insurance and financial markets sector, in financial and actuarial analysis, and within the regulatory framework applicable to the insurance sector. The selection process will, where applicable, take into account the competency matrix developed by the Company.

The description of governance processes in matters of sustainability is addressed in greater detail in S1-1. Policies related to own personnel correspond to section S1, where the policies, procedures and measures related to the Group's involvement and management in these matters are discussed in more detail.

## Committees.

The Board of Directors has two advisory committees:

### Audit and Compliance Committee.

The Audit and Compliance Committee is **composed** of the following members:

| MEMBER                                      | POSITION            | LEGAL CATEGORY |
|---------------------------------------------|---------------------|----------------|
| Ms. Rita Estévez Luaña                      | Chairwoman          | Independent    |
| Ms. Ana María Plaza Arregui                 | Member              | Independent    |
| Mr. Alfonso Botín-Sanz de Sautuola y Naveda | Member              | Proprietary    |
| Mr. Pablo González-Schwitters Grimaldo      | Non-board Secretary |                |

|                                     |      |
|-------------------------------------|------|
| Percentage of independent directors | 67%  |
| Percentage of women                 | 67%  |
| Number of meetings 2025             | 9    |
| Attendance ratio                    | 100% |

The members of the Audit and Compliance Committee, and especially its Chairwoman, have been appointed based on their expertise and experience in accounting, auditing, and risk management, both financial and sustainability-related. Their full professional profiles are available on the company website.

Among others, the **main functions** of the **Audit and Compliance Committee** are:

- To report to the General Meeting, through its Chair, on the status of the control of the Company and the activities of the Commission during the financial year.

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- To propose to the Board of Directors, for submission to the General Meeting, the appointment, reappointment, or replacement of external auditors and sustainability information verifiers, and the terms of their engagement. To ensure the independence of the external auditor and sustainability information verifier and to monitor compliance with the audit and verification contract.
- To oversee, supervise and evaluate the process of preparing and the integrity of financial and Non-Financial Information, as well as the control and management systems for financial and non-financial risks relating to the company and, where applicable, to the Group (including operational, technological, cybersecurity, legal, social, environmental, political and reputational or corruption-related risks).
- Regarding the Non-Financial Information Statement and Sustainability Information:
  - To oversee the process of preparing and presenting Non-Financial Information relating to the Company and its Group, reporting on this process and on the integrity and clarity of the information to the Appointments, Remuneration and Corporate Governance Committee, as this committee will propose its submission to the Board for its formulation.
  - To manage the selection and hiring process of the independent verification service provider responsible for verifying Non-Financial Information and to propose its appointment to the Board of Directors;
  - To liaise with the independent verifier in order to gather information on the progress of its work, informing the Appointments, Remuneration and Corporate Governance Committee.
- Inform the Board of Directors in advance about all matters provided for in the law, for example, related-party transactions that the Board must approve.
- Monitor and review the company's regulatory compliance framework.
- To supervise and promote compliance with the Internal Code of Conduct on the Securities Market, the Code of Ethics and, in general, the Company's internal codes of conduct, as well as to supervise the operation and promote the confidential reporting mechanism for Stakeholder.

### Appointments, Remuneration and Corporate Governance Committee.

The Appointments, Remuneration and Corporate Governance Committee, as of the end of 2025, was composed of the following members:

| MEMBER                                      | POSITION            | LEGAL CATEGORY |
|---------------------------------------------|---------------------|----------------|
| Ms. Ana María Plaza Arregui                 | Chairwoman          | Independent    |
| Mr. John de Zulueta Greenebaum              | Member              | Independent    |
| Ms. Marina Specht Blum                      | Member              | Independent    |
| Mr. Alfonso Botín-Sanz de Sautuola y Naveda | Member              | Proprietary    |
| Mr. Pablo González-Schwitters Grimaldo      | Non-Board Secretary |                |

|                                     |      |
|-------------------------------------|------|
| Percentage of independent directors | 75%  |
| Percentage of women                 | 50%  |
| Number of meetings 2025             | 6    |
| Attendance ratio                    | 100% |

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Among others, the **main functions of the Appointments, Remuneration and Corporate Governance Committee** are:

- To propose the appointment, ratification, re-election and dismissal of independent directors and to report on the remaining directors.
- Evaluate the balance of skills, capacity, knowledge, diversity and experience required in the Board of Directors.
- To inform, where appropriate and through its Chair, the General Shareholders' Meeting, about the activities of the Committees during the year.
- To oversee the corporate governance of the company.
- To monitor the company's sustainability strategy and practices, assess its level of compliance, and review its sustainability policies, ensuring that they are geared towards value creation.
- Gather information on the identification, assessment and monitoring of ESG (environmental, social and governance) risks carried out by the Audit and Compliance Committee, and joint sessions may be held.
- Determine the guidelines, criteria, and reference standards that will govern the preparation of the Consolidated Non-Financial Information Statement and Sustainability Report, informing the Board. Review, validate, and report to the Board of Directors on said financial information report before its preparation, taking into account the information received from the Audit and Compliance Committee regarding the preparation process and the integrity of the information.
- Review and validate the sections of any corporate report, whether mandatory or voluntary, that have an impacts on the field of sustainability.
- To propose to the Board the remuneration policy of the directors and their individual remuneration, the individual remuneration of the executive directors and, where applicable, of the external directors, for the performance of functions other than those of a mere director and other conditions of their contracts.
- To propose the **Remuneration Policy** for senior management, including managing directors or those who perform their senior management functions under the direct supervision of the Board. Likewise, to determine the remuneration of members who, while not part of senior management, carry out professional activities that may have a significant impacts on the company's risk-taking.

#### **Other bodies: Committees.**

At the executive level, the Línea Directa Group has the following committees: Executive Committee and Management Committee, both made up of all **members of the Management Team**, who as of February 2026 are the following:

| MEMBER                      | POST                                             |
|-----------------------------|--------------------------------------------------|
| Patricia Ayuela de Rueda    | CEO                                              |
| Pablo González-Schwitters   | Secretary-General                                |
| Carlos Rodríguez Ugarte     | Chief Financial Officer                          |
| Diego Ferreiro Sánchez      | Commercial and Health Director                   |
| Isabel Guzmán Lillo         | Head of Services and Claims                      |
| Mar Garre del Olmo          | Head of People, Communication and Sustainability |
| Eva del Mazo Fernández      | Head of Portfolio and Home                       |
| Olga Moreno Sanguino        | Head of Quality and Customer Experience          |
| Antonio Valor García        | Head of Marketing                                |
| Juan José Álvarez Fernández | Chief Technical Officer                          |
| Immaculada Aldea Málaga     | Chief Risk Officer                               |
| Marian Gómez Roig           | Head of Transformation                           |
| Luis García San Luis        | Head of Technology and Cybersecurity             |

Composition of the Steering Committee updated as of the end of 2025.

The **Executive Committee's** main function is the weekly control and active monitoring of the business and its main indicators, as well as the evolution of the business plan approved by the Board of Directors.

The **Steering Committee** reviews and monitors the main initiatives and projects of special interest requested by the CEO or members of the management team.

The **Project Prioritization Committee**, made up of members of the management team, is responsible for monitoring strategic projects that require IT development and determining their prioritization according to the status of compliance with the Business Plan.

The **Reserves and Claims Committee** is an information, discussion, and decision-making body in all areas affected by claims management and the level of reserve adequacy determined by the Board and its Committees. It is composed of the Chief Financial Officer, the Head of Services and Claims, the Chief Technical Officer, the Chief Risk Officer, and the Head of the Actuarial Function.

The **Investment Committee**, comprised of the CEO, the Chief Financial Officer, and the Heads of Investments and day-to-day portfolio management, is responsible for ensuring that daily investment management is carried out in accordance with the Investment Objectives and Guidelines of the Board of Directors. This Committee reports to the Board of Directors at least quarterly.

The **Standing Risk Committee** is responsible for facilitating and monitoring the implementation of effective risk management practices within the Línea Directa Group through reporting from frontline management. It is chaired by the Chief Risk Officer and comprises the Heads of Internal Control for Financial and Non-Financial Reporting, Risk Management and Internal Control, Regulatory Compliance, Actuarial Function, and Fraud. It reports quarterly to the Audit and Compliance Committee through the Chief Risk Officer.

The Standing Risk Committee relies on the Digital Operational Resilience and Cybersecurity Technical Team regarding ICT risks. This team of experts includes representatives from the functions of ICT risk, ICT asset management, information security management, and business continuity.

The **Outsourcing Committee** is responsible for analyzing and, where appropriate, approving, rejecting, or escalating to the Audit and Compliance Committee, initiatives to outsource core

functions, once the various risk assessments for the corresponding functions have been completed in accordance with the procedure established in the outsourcing policy, for which it is responsible. It also conducts periodic monitoring and reports to the Board of Directors on agreements with ICT service providers. It is composed of the Secretary-General, the Chief Financial Officer, and the Chief Technology and Cybersecurity Officer.

The **Product Approval and Monitoring Committee** ensures compliance with the product control and governance policy. It is responsible for approving new products before they are marketed and for reviewing and periodically monitoring marketed products. It is composed of the Head of Marketing, the Head of Technical Officer, the Secretary-General, the Chief Risk Officer, the Finance Director, and the Commercial Director.

Finally, the **Sustainability Committee** is responsible for developing the Sustainability Plan, which is submitted to the Board of Directors, monitoring and tracking compliance, prioritizing, making executive decisions, and promoting initiatives to ensure the implementation of the Sustainability Plan approved by the Board. It is composed of the Director of People, Communications, and Sustainability, the Chief Financial Officer, the Secretary-General, the Head of Marketing, and the Head of Services and Claims. Within this Committee, and specifically within the social sphere, is the Diversity Advisory Committee, which oversees compliance with the commitments made in the Diversity Policy.

### **Roles and responsibilities of the Board of Directors.**

The **Board of Directors** is the Group's principal governing and representative body, in accordance with the law, the Company Bylaws, and its Regulations, which govern its composition, operation, and powers. The Board is responsible for overseeing the development of business activities and managing financial and non-financial risks, including those related to sustainability.

Risk management and oversight are carried out through the **Corporate Risk Area**, which integrates the key functions of **Risk Management, Internal Control, Regulatory Compliance, and Actuarial Function**. The **Audit and Compliance Committee** oversees these processes, reporting quarterly to the Board of Directors. In parallel, the Standing Risk Committee monitors the implementation of effective risk management practices, ensuring alignment with the risk appetite established by the Board and applicable regulatory standards.

Monitoring the sustainability strategy and its policies falls to the **Appointments, Remuneration and Corporate Governance Committee**, which assesses compliance and ensures that environmental and social practices align with the policies set by the Board. The **Sustainability Committee**, supported by the **Sustainability Working Group**, is responsible for implementing the Sustainability Plan approved by the Board, prioritizing actions and driving strategic initiatives.

### **Reporting lines and monitoring mechanisms.**

The reporting functions are clearly defined in the Regulations of the Board of Directors and the General Risk Policy:

- The **Audit and Compliance Committee** receives quarterly reports from the Director of Corporate Risks and forwards its conclusions to the Board.

- The **Chief Risk Officer** submits quarterly reports to the Commission, as the ultimate body responsible for risk supervision.

Additionally, the daily management of the Group and the implementation of the decisions adopted by the Board fall to the CEO and the executive committees.

### **Skills and specialized knowledge in sustainability.**

The Board of Directors and its Committees, as a whole, **possess training and experience in sustainability**, both through the professional background of their members and through the **knowledge update program** delivered in previous years to all Board members by external trainers, which included **ESG issues and CSRD requirements**. Furthermore, Board members may request external advice, as provided for in the Board Regulations, to delve deeper into specific areas related to sustainability.

The members of the Audit and Compliance Committee as a whole, and especially its Chair, are appointed based on their knowledge and experience in accounting, auditing, and risk management, both financial and non-financial. The Chair has proven experience in managing and defining corporate risk and compliance policies, as well as establishing control measures to ensure proper corporate governance of the Company.

The knowledge and experience of the Board members can be verified in the professional profiles published on the corporate website and in the **skills matrix**.

## Skills matrix of the Board of Directors of Línea Directa Aseguradora

|                                                   | Alfonso Botin-Sanz de Sautuola y Naveda | Patricia Ayuela | Fernando Masaveu | John de Zulueta* | Rita Estévez | Ana Plaza | Iñaki Berenguer | Marina Specht |
|---------------------------------------------------|-----------------------------------------|-----------------|------------------|------------------|--------------|-----------|-----------------|---------------|
| Insurance                                         | x                                       | x               | x                | x                | x            | x         | x               | x             |
| Banking                                           | x                                       | x               | x                | x                | x            | x         | x               |               |
| Stock exchange                                    | x                                       | x               | x                | x                | x            | x         | x               | x             |
| Financial Information Analysis                    | x                                       | x               | x                | x                | x            | x         | x               | x             |
| Analysis of Non-Financial Information             | x                                       | x               | x                | x                | x            | x         | x               | x             |
| Audit / Verification                              | x                                       | x               | x                | x                | x            | x         | x               |               |
| Financial Risk Management and Supervision         | x                                       | x               | x                | x                | x            | x         | x               | x             |
| Management and supervision of non-financial risks | x                                       | x               | x                | x                | x            | x         | x               | x             |
| Regulatory Compliance                             | x                                       | x               | x                | x                | x            | x         | x               |               |
| Digitalisation and ICT                            | x                                       | x               | x                | x                | x            | x         | x               | x             |
| Cybersecurity                                     |                                         | x               | x                | x                | x            |           | x               | x             |
| Personal Data Protection                          | x                                       | x               | x                | x                | x            |           | x               | x             |
| Artificial intelligence                           |                                         | x               | x                |                  | x            |           | x               | x             |
| Environmental issues                              | x                                       | x               | x                | x                | x            | x         | x               | x             |
| Social issues                                     | x                                       | x               | x                | x                | x            | x         | x               | x             |
| Issues of Governance and Business Conduct         | x                                       | x               | x                | x                | x            | x         | x               | x             |
| Commercial and marketing                          | x                                       | x               | x                | x                | x            | x         | x               | x             |
| Quality and Consumers                             | x                                       | x               | x                | x                | x            |           | x               | x             |
| Strategy and business development                 | x                                       | x               | x                | x                | x            | x         | x               | x             |
| International experience relevant to the Company  | x                                       | x               | x                | x                | x            | x         |                 | x             |
| Experience on other Boards                        | x                                       | x               | x                | x                | x            | x         | x               | x             |
| People management. Talent and remuneration        | x                                       | x               | x                | x                | x            | x         | x               | x             |

\*Deceased in January 2026.

The Board of Directors, with regard to diversity, is made up of **3 different nationalities**, with an **equal representation of 50% women and men**, and an **age between 49 and 79 years**.

The eight directors who were part of the Board of Directors during 2025 had **professional experience, training and skills** in the **three principal areas considered material** for sustainability purposes (**environmental issues, social issues and governance and business conduct issues**), as well as skills in the management and supervision of non-financial risks.

### Organisation of sustainability governance.

The Group structures sustainability governance through the following bodies and groups:

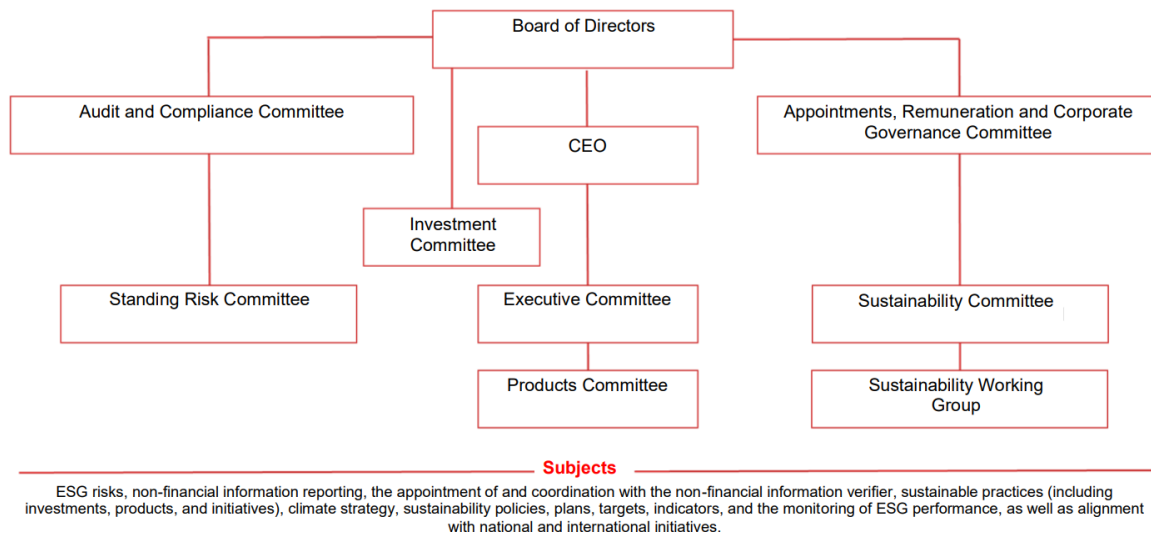
- Board of Directors: approves and oversees the sustainability strategy and policy.
- Appointments, Remuneration and Corporate Governance Committee: evaluates compliance with the sustainability strategy and its policies.
- Sustainability Committee: designs and implements the Sustainability Plan, proposing goals and monitoring their fulfillment.

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- Sustainability Working Group: facilitates the implementation of the plan across the organisation.
- Standing Risk Committee: oversees ESG risks and other non-financial risks, ensuring an adequate level of internal control.

### Sustainability governance



The diagram reflects an integrated governance aligned with the strategic sustainability goals.

### GOV-2. Information provided to the company's administrative, management and supervisory bodies and sustainability issues addressed by them.

At Línea Directa Aseguradora, the Appointments, Remuneration and Corporate Governance Committee and the Sustainability Committee play a fundamental role in monitoring, evaluating and making decisions related to sustainability issues.

The **Appointments, Remuneration and Corporate Governance Committee** is assigned, among others, the following powers related to sustainability, as indicated above:

- Monitoring the company's sustainability strategy, practices, and goals, assessing their level of compliance, and reviewing their sustainability policies to ensure they are geared towards value creation.
- Monitoring that the Group's environmental and social practices comply with the policies approved and the strategy established by the Board of Directors.
- The report to the Board of Directors on membership in associations and initiatives, both national and international, that involve the assumption of commitments to action or good practices.

The **Sustainability Committee** is responsible for preparing the Sustainability Plan to be submitted to the Appointment, Remuneration and Corporate Governance Committee and the Board of Directors, monitoring and tracking **compliance**, prioritizing, making executive

decisions and promoting initiatives, in order to ensure the implementation of the Sustainability Plan approved by the Board of Directors.

Thus, the process of monitoring and reporting on sustainability is structured through the **preparation, review and periodic evaluation of the policies and goals established in the Sustainability Plan**, with a reporting line between the Sustainability Committee and the Appointments, Remuneration and Corporate Governance Committee.

The Board approves the results of the **Double Materiality** exercise. Based on the material IROs identified, quarterly reports are submitted to the Audit and Compliance Committee and the Appointments, Remuneration, and Corporate Governance Committee on the monitoring of actions taken and the degree of compliance with these IROs. At the end of the year, the results are presented to the committees, concluding the annual evaluation.

The committees monitor the identified IROs and the targets submitted in alignment with them throughout the year. During the year, depending on the stage of development and specific circumstances, the results of the Double Materiality assessment are submitted to the committees at least quarterly.

Additionally, the Sustainability Committee is responsible for developing the Sustainability Plan, which is submitted to the Board of Directors, monitoring and tracking compliance, prioritizing, making executive decisions, and promoting initiatives to ensure the implementation of the Sustainability Plan approved by the Board. It is composed of the **Head of People, Communications, and Sustainability, the Chief Financial Officer, the Secretary-General, the Head of Marketing, and the Head of Services and Claims**. Within this Committee, and specifically within the social sphere, is the **Diversity Advisory Committee**, which oversees compliance with the commitments made in the Diversity Policy.

With regard to the impacts, risks, and opportunities addressed by the relevant management, governing, and supervisory bodies during fiscal year 2024, the Board approved the list of material impacts, risks, and opportunities (IROs) resulting from the 2025 review of the Double Materiality exercise. The list of material IROs is described in section IRO-1, "Description of the process for determining and assessing material impacts, risks, and opportunities."

### **GOV-3. Integration of sustainability-related performance in incentive schemes.**

At Línea Directa Aseguradora S.A., the integration of sustainability-related performance into incentive systems is carried out through the variable remuneration of the CEO and the members of the Management Committee, in accordance with the Remuneration Policy, approved at the **General Shareholders' Meeting** held on March 24, 2022.

Two non-financial metrics have been established for the CEO's 2025 annual variable remuneration:

1. Compliance with the actions of the **2023-2025 Sustainability Plan**.
2. Compliance with certain quality levels measured by the **Net Satisfaction Score (NSS)**.

Regarding long-term variable remuneration, the **CEO is a beneficiary** of the **Long-Term Incentive Plan (ILP 2023-2025)**, which includes goals with a weight of 10% of specific actions of the Sustainability Plan and the incorporation of the Group into the DJSI index in 2025, for the maximum level of compliance

The sustainability-based remuneration scheme also applies to members of the Steering Committee. According to policy, the CEO's annual variable remuneration is 30% dependent on sustainability metrics, while the long-term incentive for the entire Steering Committee is 10% based on sustainability goals.

The **Remuneration Policy for Directors** is approved by the General Shareholders' Meeting every three years. In addition, specific targets linked to short-term variable remuneration are defined annually, ensuring alignment with strategic sustainability goals. The Remuneration Policy approved in 2022 expired in 2025.

For more detailed information, Línea Directa makes the Annual Remuneration Report available to interested parties through the corporate website, in addition to submitting it to the National Securities Market Commission (CNMV).

#### **GOV-4. Due Diligence Statement.**

Línea Directa Aseguradora has carried out a **Human Rights Due Diligence** exercise with the aim of addressing regulatory trends, the requirements of supervisors and analysts and the commitments assumed by the Group.

The objective of this Línea Directa Due Diligence process, its follow-up and its report, is to be aligned with best practices in Human Rights and respond to the demands of different ESG analysts, serving as support for the measurement of the impacts on society regulated by Law 11/2018 on Non-Financial Information and Diversity, which transposes EU Directive 2014/95 and establishes a framework for analysis in Human Rights.

The following international frameworks have been taken into account for the Due Diligence procedure, most of which are also included in the Group's Human Rights Policy:

- The International Bill of Human Rights of the United Nations (UN).
- The Declaration of the International Labour organisation (ILO), as well as its fundamental conventions relating to fundamental principles and rights at work, freedom of association and freedom of trade union, the effective recognition of the right to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labour and the elimination of discrimination in respect of employment and occupation.
- The OECD Guidelines for Multinational Enterprises.
- The European Convention on Human Rights.
- The European Union's 2020-2024 Human Rights and Democracy Plan

Línea Directa Aseguradora is firmly committed to applying other national and international Human Rights standards, always with the aim of expanding its commitment in this area and integrating them into its risk management, decision-making and governance procedures in its operations and in its relationship with its Stakeholders.

This commitment will also allow the Group to promote transparency in all its policies and procedures and engage with customers, companies in the sector and other Stakeholders to share best practices in this area, address common problems and offer real solutions.

Línea Directa Aseguradora Human Rights Due Diligence procedure includes identifying potential Human Rights violations based on the Group's commitments. These commitments

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cover **five dimensions** of the Group: **as an employer, as an insurer, as an investor, as a collaborator and partner, and in relation to its environment.**

The identification of risk events is accompanied by the delineation of negative impacts, both real and potential, and defines the criteria to be considered for their assessment, prioritization, and management. An independent third party participated in defining and developing this process, and the key areas responsible for each of the five dimensions were involved.

The risk event assessment process is based on Línea Directa Aseguradora risk analysis methodology, ensuring consistency in criteria. Furthermore, the methodology defines how to evaluate the impacts, probability, and severity of each event.

The Human Rights due diligence process is conducted **at least every three years**. Due to the current regulatory landscape in sustainability, which has led to the postponement of the implementation of European due diligence regulations, the Group has maintained its 2025 impacts assessment.

This methodology serves as a basis for **identifying potential risks in the field of Human Rights** in operations and in the value chain, in business-related activities and in new commercial relationships, such as mergers, acquisitions or joint ventures.

Once the impacts and probability variables have been assessed, the severity of each of the risk events is obtained, which allows the Group's Human Rights risk map to be built.

A categorization of potential Human Rights violations has been carried out taking into account the blocks of the **Human Rights Policy of Línea Directa Aseguradora**: as an employer, as a collaborator and partner, as an insurer, as an investor and in relation to its environment.

In addition, the following guidelines have been used in this process:

- Guide to Environmental, Social and Governance (ESG) Risk Management in the General Insurance Business by **UNEP-FI and the PSI or Principles for Sustainable Insurance**.
- Guide to Assessing and Managing Human Rights Impacts of the International Finance Corporation.

For each of the risk events listed in this document, the potential threat, the Stakeholders who would be affected, and the connection to Línea Directa Aseguradora's Human Rights Policy have been contextualized. This implies:

- Description of the risk event and its connection to Human Rights (primary and related). The following aspects have been taken into account, where applicable: forced labor, human trafficking, child labor, freedom of association, the right to collective bargaining, equal pay, discrimination, and the right to a healthy environment.
- Stakeholders affected by each risk event: customers, employees, suppliers and/or society.
- Linking each risk event to the commitments defined and included in the Human Rights Policy
- Frequency of risk mapping: The Group's risk map is reviewed regularly, with each risk being reviewed at least once a year. This risk mapping is carried out jointly by the Corporate Risk area and the area responsible for managing each threat.

## **GOV-5. Risk management and internal controls for the disclosure of sustainability information.**

At Línea Directa Group, risk management and internal control related to sustainability disclosure are integrated within its **Risk Management and Internal Control System**. This system is designed to ensure the identification, assessment, mitigation, and review of sustainability-related risks and to guarantee an effective control environment that strengthens long-term sustainability.

### **Key features of the risk management and internal control system.**

In 2025, the Corporate Risks area implemented the **Internal Control over Sustainability Reporting (ICSR)** for the Línea Directa Group. The Group's ICSR was defined based on the **COSO (Committee of Sponsoring organisations of the Treadway Commission)** methodological framework, with the objective of ensuring that information is reported accurately and in accordance with international standards, establishing governance and control elements similar to the Group's Internal Control System for Financial Reporting (ICSFR), applied to the reported sustainability information.

With the aim of establishing the process and responsibilities for the implementation and management of the **Internal Control over Sustainability Reporting (ICSR)**, and defining the overall framework for action regarding internal control of the sustainability information reported by the Group, a **Internal Control over Sustainability Reporting Policy** for the Línea Directa Group has been developed. This policy was approved by the Board of Directors on September 26, 2024, and with it, the Línea Directa Board of Directors demonstrates its commitment to establishing an appropriate internal control system for sustainability information.

While the policy establishes responsibilities and main guidelines for action, in 2025 the **ICSR Methodology document of Línea Directa Group was approved** which, following the COSO methodology, defines in detail the processes of control environment, identification and evaluation of sustainability information risks, control activities, information and communication, and monitoring of the operation of the system.

In this sense, it can be stated that the process exists and is documented, and work continues on its development.

The scope of the Internal Control System for In-Service Accounting (ICSIA) is defined primarily in terms of materiality, while also considering qualitative criteria. The starting point is the Group's Double Materiality analysis, which, revised in 2025, is conducted based on CSRD guidelines and the ESRS framework. This analysis identifies the indicators to be reported and assesses both the impacts the entity generates on its environment and the risks and opportunities that Stakeholders present to the entity itself. Thus, relative importance is determined from a Double Materiality perspective: impacts materiality and financial materiality.

After identifying the material processes and indicators based on the Double Materiality perspective, qualitative criteria will be taken into account, depending on the complexity of the preparation or extraction of the data to be reported.

The business processes identified as relevant have been assigned a responsible area which, under the supervision of the Sustainability Information Internal Control area, will be in charge of executing the necessary controls to mitigate the identified information risks.

These areas responsible for controls will thus carry out their first-level control function within the Internal Control over Sustainability Reporting (ICSR). The Sustainability Reporting Internal

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Control function will request evidence of the implementation of these controls and, under the supervision of the Group's Corporate Risk Management, will carry out the second-level control function. The Group's Internal Audit department is responsible for overseeing the operation and effectiveness of the ICSR within its third-level control role.

All processes and subprocesses included in the ICSR are defined and detailed through flowcharts, descriptive narratives for each process, and risk and control matrices, which detail the processes and subprocesses, the risks associated with them and the controls that mitigate them, as well as the frequency with which these controls are carried out.

### **Risk assessment and prioritization approach.**

Risk assessment at Linea Directa Group is a dynamic and continuous process to identify and analyze risks at all levels of the organisation and, in the specific case of the ICSR, the risks related to the reporting of sustainability information.

As a step prior to risk identification, it is necessary to determine which indicators will be developed in the control environment to provide **security and reliability** to the information and with what prioritization based on the criterion of relative importance defined in the CSRD and considerations specific to the business and the technological tools that are related to the processes.

Once the material indicators, their locations and applications, and the processes where they are housed have been defined, the risks associated with the possibility that the reported sustainability information is incorrect are identified.

The identification and assessment of risks in the ICSR is determined by the **sustainability information control goals** that have been defined in the Group based on the characteristics that the information must have according to section 2 of ESRS 1 of the CSRD:

- Relevance
- Faithful representation (which requires that the information be complete, neutral and accurate).
- Comparability
- Verifiability
- Comprehensibility

In the risk identification process, Internal Control assesses aspects that could lead to a deviation in the reported information, resulting in a failure to meet the aforementioned attributes. Risks that can affect the reliability of sustainability information include, among others, calculation errors or errors in the application of standards, system failures, lack of knowledge of key information, estimates or projections, and other risks of various kinds.

Once identified, the risks are assessed. This assessment allows for an analysis of the impacts of potential events on achieving goals related to the reliability of sustainability information and the susceptibility of sustainability reports to significant errors if no controls are in place.

Risk is measured in terms of impacts and probability; therefore, the significance and probability of the risk of a material misstatement must be determined. The significance of the risk is measured based on:

- **Quantitative criteria** if they are numerical indicators, monetary values or percentages.

- **Qualitative criteria**, with measurement scales for a series of predefined qualitative parameters that allow a rating to be applied and thus objectify the expert judgment in the assessment.

The **probability is also assigned based on a weighting** from very low to very high, while the criticality or risk level is calculated as the product of the probability of occurrence of the event by the calculated rating (importance).

### **Main risks identified and mitigation strategies.**

The main risks identified that may affect the reliability of sustainability information are:

- Errors or omissions in the data recording of management tools.
- Errors in calculations or application of standards when developing indicators.
- System failures.
- Absence of relevant policies and/or procedures for sustainability information.
- Inconsistency with financial reporting.

Once risks are identified, response measures are designed. The control goals associated with each risk are analyzed, and the necessary controls are defined to ensure these goals are not jeopardized. The level of control mitigation is therefore determined based on how the control contributes to achieving the risk-related control goals. Other factors that influence mitigation are also considered, such as the type of control (preventive or detective), its frequency, and whether it is automatic or manual.

The main controls implemented are related to the review and reconciliation of the information included in the tools from which the data is extracted, review of indicators that require calculations, monitoring of relevant policies, automatic controls on data shared with other reports, controls on system failures, etc.

### **Integration of risk assessment and internal controls.**

The Group's Internal Information Control area, which reports to the Corporate Risk Management Department, reviews and tests the controls reported by the business areas to determine if they operate correctly, are adequately designed, and mitigate the inherent risks to which they are associated. Based on the results of these reviews, it is determined whether corrective actions are required.

To ensure that the relevant governing bodies monitor this internal control of sustainability information, the ICSR area prepares reports with the results of the work carried out and all matters it considers necessary to report.

In accordance with the **Regulations of the Board of Directors**, the Audit and Compliance Committee is responsible for understanding, monitoring and evaluating the process of preparing and the integrity of financial and Non-Financial Information, as well as the control and management systems for financial and non-financial risks related to the Company.

Based on this, the Commission monitors and evaluates the process of preparing and the integrity of the sustainability information reported in the Sustainability Report and assesses

the effectiveness of its internal control system (ICSR) in identifying, managing, and adequately communicating the main associated risks. To carry out its supervisory role, the Commission must receive periodic reports that allow it to reach a sufficient understanding and an overall conclusion regarding the degree of confidence and reliability of the system, and whether the entity has correctly applied the applicable reporting policies and regulations, including, where appropriate, proposals for improvement.

To that end, the Internal Control of Sustainability Information area produces the following reports:

- **ICSR Quarterly Report** reported to the Audit Committee, which includes the most relevant aspects of the quarter: evolution in the development of the function, results of the controls, evidence provided and reviewed, open impacts, follow-up of impacts from previous months, etc.
- **ICSR Annual Report** reported to the Audit Committee, which is issued at year-end, together with the 4Q quarterly report and consists of an executive summary of what has happened in the year in the ICSR, so that the Audit and Compliance Committee can have a summary of the exercise.
- **Report results to the Steering Committee**, informing them of the most relevant data that may affect their respective departments.

## Strategy

### **SBM-1. Strategy, business model and value chain.**

The Línea Directa Group integrates sustainability into its operations and culture through the various three-year sustainability plans it designed to create value for the organisation and its identified Stakeholders.

In this regard, the Línea Directa Group's Sustainability Plan for the **three-year period 2023-2025** has served as the roadmap for environmental, social, and governance (ESG) matters. The vision of this fifth Sustainability Plan included the objective of guiding the Línea Directa Group towards sustainable growth, promoting ESG dimensions from within the Group and positioning its direct model as the best asset for Stakeholders.

The Fifth Plan comprised nearly one hundred actions aimed at achieving a series of goals defined based on the materiality assessment. These goals included integrating sustainability into product and service innovation, generating greater added value in response to analysts' and investors' demands regarding sustainable business practices, and anticipating compliance with European Union sustainability regulations.

Following the multidisciplinary approach that sustainability is acquiring, the Group developed the strategic lines of each dimension aligned with the aspects identified as material in **its three ESG pillars**.

The Plan incorporated fundamental new elements, which allowed the Group's strategy to be adapted to strengthen its position in the face of the new challenges acquired after its IPO in 2021. In particular, the assessment carried out within the framework of the Dow Jones Sustainability Index was part of the criteria used in the preparation of the Plan, given the interest shown by the investment community towards the Group, which motivated the invitation to participate in the S&P Global CSA in the 2022 fiscal year.

In this regard, during the period of the V Sustainability Plan, the Línea Directa Group has achieved the cut-off score for entry into the Dow Jones Sustainability Index World in the sustainability assessments carried out by S&P Global during the 2023 and 2024 fiscal years, with scores of 72 and 76. In 2025, the Group obtained a score of 76.

These results, which demonstrate the Group's strong ESG performance during the period, have earned it a place in the **Sustainability Yearbook for 2024, 2025, and 2026**, making it one of the world's leading insurers in terms of **ESG performance**. The company was selected from among more than 7,600 companies assessed by **S&P Global** worldwide and is among the 34 Spanish companies recognized in the S&P Global yearbook.

The 2025 fiscal year concluded with **83% of the Plan achieved**, having completed 15 of the 18 planned actions: 3 initiatives in the environmental area, 7 actions in the social area, and 5 in the Good Governance area. This achievement has strengthened the insurance group, placing it at a high level of performance, which provides a solid foundation for progressing towards its sustainability goals in the short and medium term.

## Environmental perspective.

The Group's direct business model, which allows its insurance operations to be carried out centrally in a single location, naturally gives the Group greater potential for environmental efficiency compared to its peers.

The Group operates in a key sector for the transition to a low-carbon economy, acting as an institutional investor and an insurance company. Furthermore, it is committed to generating Positive impact to meet society's needs in this area, such as through sustainable mobility.

Línea Directa meets stakeholder expectations by responsibly managing its operations, innovating sustainable products and services, overseeing its value chain with care, and incorporating ESG criteria into its investment portfolio.

In this regard, they highlighted the following **three major areas of action** within the now completed **V Sustainability Plan 2023-2025**:

- **Sustainable business generation:** design and development of products and services aimed at promoting sustainable practices in mobility, enhance home habitability and energy efficiency, and improve people's well-being and health.
- **Climate roadmap:** The Group has a climate strategy aligned with TCFD recommendations and has defined a roadmap for the decarbonisation of both its own operation and its investment portfolio.
- **Eco-efficient management and circular economy:** Línea Directa promotes the efficient management of resources through the reduction of its consumption, the self-generation of renewable energy and the systematization of waste treatment.

In the environmental dimension, the Group carried out an update of its report on the management of risks and opportunities arising from climate change, in accordance with the requirements of the TCFD framework.

New opportunities for improvement in environmental management and operational efficiency were also analyzed. A significant reduction in energy consumption was achieved in 2025 compared to 2022. The Group's parent company carried out its operations with up to **29% less consumption of natural gas, diesel, and non-self-generated grid electricity**, significantly **exceeding the established target of a 15% reduction compared to 2022**.

This progress reflects an optimal level of energy efficiency and highlights the business model's ability to operate with low energy consumption.

Within the framework of the **VI Sustainability Plan** approved for the three-year period **2026-2028**, and within the initiatives approved for the 2026 fiscal year, the Group plans to collaborate with new analysts with the aim of providing the market with more detailed information on its environmental performance.

Furthermore, given the boost and differentiation provided by the Group's strategic commitment to digitalisation, progress will be made in developing a methodology for calculating Línea Directa Aseguradora digital footprint, which will allow the identification of emissions associated with the use of its digital assets.

The company publishes the Group's carbon footprint across its three scopes in its Consolidated Non-Financial Information and Sustainability Report 2025. 99% (market-based) of emissions come from Scope 3, with Category 1, "Purchased Goods and Services" (43%), and Category 15, "Investments" (53%), generating the largest volume of indirect emissions linked to the

business. The calculation incorporates methodological updates compared to previous years, and this specific calculation will be included in future years.

### Social perspective.

Aware of its direct impacts as an insurer, employer, and community participant, the Línea Directa Group is committed to the progress of society and is involved with the communities it serves.

In this dimension, the following action blocks of the 2023-2025 Plan, which ended last year, stood out:

- **Diversity, equality and Human Rights:** the Group promoted a just society, by upholding the values of equality and diversity and ensuring respect for Human Rights across its operations and Stakeholders interactions.
- **Talent:** Línea Directa adopts best practices to attract, retain, and support talent, emphasizing employee well-being, diversity, workspace safety and health.
- **Advancing social strategy:** The Group boosted its social strategy through strategic partnerships, internal programs, and the Línea Directa Foundation, which focuses on road safety. Furthermore, combating social exclusion and promoting healthy lifestyles are other priorities for the Group within its social focus.

Furthermore, within the framework of the social axis, the Group has promoted various initiatives aimed at strengthening the management of cybersecurity and information security, highlighting the implementation and adaptation to the **NIST CSF v2.0 standard** of reference for financial entities.

Furthermore, the Group maintains its commitment to the **Línea Directa Foundation**, supporting the activities carried out to promote road safety in Spanish society. The action Plan approved by its Board of Trustees was fully implemented.

During the reporting period, the Group achieved one of its most important strategic goals: sustainability training for its workforce. Between 2023 and 2025, more than 88% of employees received training in this area, reinforcing the cross-cutting integration of ESG criteria into corporate activities.

Additionally, during this same period, the Group has incorporated, for each year of the Plan, 2023-2025 ESG goals in the **third quarter variable remuneration of more than 97% of back-office staff**, promoting the alignment of teams with the sustainability strategy and enhancing the execution of the key initiatives of the Sustainability Plan through co-responsibility in its different lines of action.

Likewise, 30% of the **variable remuneration of the CEO** and the management team remained linked to the achievement of the strategic goals of the Plan corresponding to 2025.

In 2025, the Group launched a **new telemedicine service** linked to its health insurance, providing 24/7 care and allowing customers to access personalized online rehabilitation programs. This service, specifically designed for older adults, facilitates access to treatments without travel and with greater convenience, generating a positive social and environmental impacts on this vulnerable group and society as a whole.

Furthermore, the Group has continued to develop initiatives within its **Health and Well-being program for employees**, incorporating activities related to physical activity, nutrition, emotional Well-being, and financial Well-being. **These initiatives reached 26.7% of the workforce.**

Finally, the Group has collaborated with PRODIS on an initiative aimed at a vulnerable group, thus reinforcing its commitment to the Social Impacts and Financial Inclusion Policy and contributing to the fulfillment of its commitments in this area.

In 2026, within the **social dimension promoted by the 2026-2028 Sustainability Plan**, the Group will focus on fostering a culture of diversity, inclusion, and Human Rights; implementing the Well-being and Health Plan in its emotional, physical, and economic dimensions; and establishing a new leadership model based on skills and values. It also commits to a training plan for the company's growth and transformation, aligned with its strategic business approach.

On the other hand, the Group will continue its firm commitment to **reducing traffic accidents** and road deaths, in compliance with the Línea Directa Foundation Plan.

Actions will also be developed to enhance the social impacts on young people through **professional development programs** and the **attraction of young talent**.

Regarding customer experience, several initiatives have been approved that will raise awareness and offer sustainable solutions, such as incorporating sustainable criteria into its **POR SER loyalty program**, launching products with environmental and social coverage, and evaluating service quality in new lines of business through perception and satisfaction surveys, to extend service excellence to all new products.

### **Good governance perspective.**

Good governance is a material issue for Línea Directa . The Group adopts good governance recommendations regarding the composition and operation of its governance system and continuously and progressively incorporates best practices identified in the market.

Ethics, good corporate governance and values are an essential part of the Group's culture and are applied in all its activities and processes, such as transparent reporting of information, responsible marketing of its products, financial investment strategy and management of its supply chain.

Four key action areas in this dimension were highlighted in the three-year Sustainability Plan that concluded in 2025:

- **Responsible and high-quality marketing.** The Group consolidated the responsible and accessible marketing of products and services, as well as customer service under the highest quality standards.
- **Corporate governance, ethics, compliance, and risks.** Línea Directa strengthened its corporate governance model, developed an ESG risk map, implemented an Ethics Channel, and created a Human Rights Due Diligence procedure.
- **Responsible investment and insurance.** The Group's investment strategy has been aligned with ESG best practices and its sustainable insurance position has been strengthened.
- **Responsible supply chain.** The Group incorporates ESG criteria into its supply chain management practices.

Within the Governance pillar of the 2025 Sustainability Plan, the Group has implemented six strategic actions aimed at strengthening governance and compliance with regulatory obligations. In the second quarter of 2025, the Integrity Policy was updated, incorporating specific principles to regulate contributions and donations to organisations and associations, thereby reinforcing the framework for responsible conduct.

Furthermore, the Group has made progress in implementing the Sustainability Reporting Internal Control System (ICSR), by developing and implementing a procedure for preparing the Sustainability report under the CSRD and Law 11/2018 still in force, reinforcing the reliability of the reporting and laying the foundations for reasonable future assurance, parallel to the Financial Information Internal Control System and the work of external auditors.

The 2025 Sustainability Plan has also incorporated, as a priority, compliance with European Artificial Intelligence regulations, constituting a significant milestone for the company. The implementation of AI Governance, the definition of a specific risk model to address the associated new challenges, and the creation of a corporate inventory of AI systems have strengthened transparency, traceability, and responsible control of this technology.

Furthermore, the implementation of the RAI (Responsible AI) group ensures continuous monitoring and ethical application of AI throughout the organisation, aligning its use with the principles of safety, respect for fundamental rights and sustainable value creation.

Additionally, the Group aligned its sustainability strategy with the Sustainable Development Goals (SDGs). In this regard, the Group understands its actions from the perspective of the different roles it plays in its business operations: as an insurer, as an employer, as an investor, as a partner and collaborator, and as a social agent.

In this way, the entity, within the framework of its Sustainability Plan for the three-year period 2023-2025, incorporated goals that contribute fundamentally to 12 of the 17 SDGs:

- **SDG 3** Health and well-being.
- **SDG 4** Quality Education.
- **SDG 5** Gender Equality.
- **SDG 7** Affordable and clean energy.
- **SDG 8** Decent work and economic growth.
- **SDG 9** Industry, Innovation and Infrastructure.
- **SDG 10** Reduced inequalities.
- **SDG 11** Sustainable Cities and Communities.
- **SDG 12** Responsible production and consumption.
- **SDG 13** Climate Action.
- **SDG 16** Peace, justice and strong institutions.
- **SDG 17** Partnerships for the goals.

## **VI Sustainability Plan 2026-2028.**

Since March 2022, the Group has operated with a **Sustainability Governance model** based on the **Sustainability Working Group**, the **Sustainability Committee**, the **Appointments, Remuneration and Corporate Governance Committee** and the **Board of Directors**.

This consolidated sustainability governance model plays a fundamental role in monitoring, evaluating, and making sustainability decisions. The Sixth Sustainability Plan 2026-2028 has been developed under this model, involving each and every body.

During the period 2023-2025, the Group developed a **Stakeholder Map**, which served to identify and classify Stakeholders according to their degree of influence and impacts, and to establish expectations, commitments, communication channels, and goals to address their needs. The company has maintained a high level of achievement of the established goals, which it will continue to pursue in the new 2026-2028 Plan.

In 2024, the Group conducted its **Double Materiality** study, engaging Stakeholders through questionnaires to assess its environmental and social impacts. In 2025, the Double Materiality study was reviewed and validated by the **Working Group and the Sustainability Committee**. This Double Materiality exercise identified the relevant social and financial impacts issues for the Group, which formed the basis for the **Sixth Sustainability Plan 2026-2028**.

The creation of the new Sustainability Plan stems from an external and internal analysis that identified the Group's strengths and areas for improvement in sustainability, as well as the opportunities and trends projected for the medium and long term. In addition, interviews were conducted with management and the CEO to understand their strategic vision for the Group in 2030.

This analysis has served as a basis for defining the key areas for the next three years in terms of environmental management, decarbonisation, social impacts, good governance, ethics and responsible risk management.

The new Sustainability Plan 2026-2028 has as its central vision "To drive the sustainable growth of the Línea Directa Group, contributing to the improvement of the environment and society, complying with the highest levels of ethics and integrity."

The Plan is structured around **6 fundamental goals**:

- To have a **Positive impact on society** and the **environment**.
- **Generating business**: attracting and retaining customers.
- Managing **talent** and sustainable **culture**.
- Promote **transparency** and sustainable **financial management**.
- To carry out a **sustainable transformation and digitalisation (AI)**.
- Generate **value for the shareholder**.

Additionally, a seventh cross-cutting objective has been established that reflects the Group's firm commitment to fulfilling the commitments and expectations of the Stakeholders, which will facilitate a better response to the needs of the different groups with which it interacts.

These 8 goals have been grouped around the following three perspectives, and their purpose:

- **Environmental focus**. Environmental management and decarbonisation: Implementation of an environmental strategy, aligned with the fight against climate change, ensuring levers linked to the reduction of Greenhouse Gases (GHG), energy and resource efficiency, in order to position the Group as a benchmark for sustainable digitalisation.
- **Social Focus**. Positive social impacts on Stakeholders: Ensure an environment of professional development, values-based leadership, equity, and diversity. Promote sustainability among Stakeholders as a driver of value creation. Foster a customer experience and offering that fosters loyalty and attracts new customers. Increase Positive impact on society by positioning the Línea Directa Group and Foundation in new areas of activity.

- **Governance Pillar.** Good Governance, Ethics, and Responsible Risk Management: Strengthen ethical decision-making and a comprehensive risk management framework. Promote digitalisation and responsible AI. Ensure the security of client operations and support universal accessibility. Guarantee the conditions for business continuity in a highly uncertain environment and incentivize sustainable finance.

To achieve these established purposes and goals, the VI Sustainability Plan will revolve around 15 strategic lines, on which ESG actions will be developed for the next three years.

In the current context of sociopolitical and economic uncertainty and a changing regulatory environment, the Sustainability Committee will annually submit a proposal to the Appointments and Remuneration Committee outlining the ESG actions planned for each year of the Plan's validity. This distribution of actions by year will allow for greater alignment with the business and better adaptation to regulatory and/or operational changes that may arise during the three-year period.

### **Core components of Línea Directa Group's strategy.**

Línea Directa Aseguradora has the vision of consolidating itself as one of the leading insurers in Spain for individuals, the self-employed and SMEs.

To achieve this goal, the company's strategy relies on its direct business model, an increasingly broad multi-product offering of general insurance, quality service, a leading brand, and its commitment to innovation and digitalisation. All of this provides the company with the competitiveness, flexibility, and agility necessary to meet current and future challenges and opportunities and generate profitable and sustainable growth.

By the close of 2025, the company reached a volume of **premiums issued of € 1,134.7 million**, 11.3% more than in the previous year, exceeding the market average growth of 7.8%, according to data from ICEA, the statistics and research service for the insurance sector in Spain. This business growth was driven by customer growth and increased revenue across all its lines of business: **Motor, Home, Health, and Other Products**. In this regard, the policyholder portfolio grew by 8.5%, surpassing **3.7 million policyholders**. In 2025, the company ranked 13th among Non-Life insurance groups in Spain by revenue, maintaining its 2024 position.

This positive commercial dynamic, together with the positive evolution of the insurance margin, resulting from an improvement in the combined ratio of 2.1 percentage points, has allowed the company to close the 2025 financial year with a **net profit of 85.7 million euros**, 33.5% more than the previous year.

### **Multi-product company**

Línea Directa began operations in 1995 with a business model based on the direct distribution of general insurance. It operates exclusively in Spain through telephone and digital channels, without a network of offices, and with all its operations centralized at its headquarters in Tres Cantos (Madrid), resulting in high operational efficiency. This, combined with technical expertise, innovation in marketing and products, and advanced digitalisation of its processes, allows the company to offer customers comprehensive products and high-quality service at competitive prices.

The ambition of the Línea Directa Group is to cover all the insurance needs of individuals, the self-employed and SMEs through a highly competitive general insurance offer, high quality of service and an advanced digital experience through the web and mobile application.

Through the progressive development of new lines of business, the entity has consolidated itself as a multi-product insurance company, and currently has a wide range of insurance products for cars, motorcycles, professional vehicles, home, health, pets and businesses, among others.

In this regard, in 2025 Línea Directa entered the **Multi-Risk Business** sector with the launch of its new **Multi-Risk Business insurance for establishments**, premises and offices of self-employed individuals and SMEs, with which the entity wants to boost its growth in the business segment.

This expansion of the product portfolio and business lines is one of the levers the Línea Directa Group is using to boost revenue diversification. At the close of 2025, the **Motor insurance** line will account for **81.4% of the company's total written premiums**, ahead of **Home (14.8%), Health (3.4%), and other products (0.3%)**. In 2024, Motor insurance represented 81%, Home 15.5%, Health 3.3%, and other products 0.2% of total written premiums.

### Digitalisation with a customer focus

The company continues to **advance its digital transformation by making life easier for customers** through increasingly comprehensive, agile, and user-friendly digital assets. To this end, the company is continuously evolving its existing developments while implementing new technologies that will help optimize process management and improve customer experience and service.

In this regard, in 2025 the company completely revamped its mobile application and the Customer Area of its website, facilitating the digital management of policies by policyholders.

Among the main new features, the company's new digital channels include a new, more intuitive and personalized, mobile-first design with advanced usability, allowing customers to manage all their insurance policies with both virtual and human assistants. Furthermore, they are built according to accessibility guidelines, making them easy to use for all types of users.

Furthermore, Línea Directa has continued to **strengthen its technological capabilities**, expanding the use of **generative Artificial Intelligence (AI)**.

All of this has translated into a strong boost in the adoption of digital channels by policyholders. Currently, more than 91% of **Línea Directa Aseguradora customers** already **interact** with the company through its **website and mobile app**, and the **number of active apps** for the company **increased by 15.4%**. As a result, the volume of digital customer interactions exceeded **28 million in the year**, a figure 2.7 times higher than the number of customer phone calls.

In 2024, access to digital channels (web and APP) exceeded **2 million per month**, with a similar ratio to the volume of calls received (2.4).

This increased use of digital channels has also allowed the Group to increase commercial activity through the website and app, so that in 2025 the number of policies subscribed 100% online multiplied by 3.6.

Línea Directa a multi-product company specializing in general insurance that currently operates in the **Motor, Home, and Health sectors**, and completes its offering to individuals, the self-employed and SMEs with insurance for **pets, businesses and personal mobility**.

### Motor insurance.

Motor insurance is the core of the Group's business activity.

By the close of 2025, the Auto insurance sector accounted for 81.4% of the company's revenue, with a volume of **premiums issued during the year of € 924 million (+11.8%)**, and 2.73 million customers (+8.6%). These growth figures, exceeding the sector average, allowed Línea Directa to gain market share and consolidate its position as the sixth largest insurer in the sector by premiums at year-end.

The Group offers a comprehensive and personalized range of insurance policies for cars, motorcycles, personal mobility vehicles, and commercial vehicles, catering to individuals, the self-employed, SMEs, and large corporations. Additionally, the Company has a specific commercial offering for insuring vehicles located in Spain for residents of other countries, particularly the United Kingdom and Germany.

The company's product lineup includes traditional options (All Risks, All Risks with Excess, Extended Third Party and Third Party) to differential coverages such as Superterceros parties, which extends the guarantees of insurance to third parties with own damages in certain circumstances.

The Línea Directa Group operates in this sector with two other independent brands: Penélope Seguros, created in 2012 with coverage specially designed for women, and Aprecio, an insurance aimed at motorcycle users.

### **Electric and plug-in hybrid car insurance.**

Within the auto insurance sector, Línea Directa offers a policy specifically designed for **zero-emission vehicles** (including **100% electric and plug-in hybrid vehicles**). The company ended 2025 with a portfolio of nearly **60,000 cars and motorcycles** with these types of engines. 2024 ended with over 36,000 privately owned electric and plug-in hybrid vehicles in its portfolio.

### **Home insurance.**

The Home business line, in which the Group began operating in 2008, reached **premium turnover of € 167.8 million (+6.3%)** in 2025 and covered more than 776,000 insured homes (+5.0%). This business line accounts for 14.8% of the Group's revenue and 20.8% of its customer base. In 2024, the Home business line contributed 15.5% of revenue and 21.5% of the number of customers. As of the date of this report, Línea Directa ranks 13th in the Home Insurance business line by volume, maintaining its position from the previous year.

As in the field of car insurance, the Group has a specific business line for insuring homes in Spain for residents of other countries.

In recent years, the Group has strengthened its Home insurance offering through partnerships with companies in other sectors. The aim is to allow its customers to access other home-related services under advantageous conditions.

### **Home insurance with solar panel coverage**

This coverage is designed for single-family homes with solar panels and covers damage from theft or accidental breakage that may occur in that installation, as well as the loss of energy production.

### **Health insurance.**

Línea Directa Aseguradora began its activity in the health insurance sector at the end of 2017. As of the end of the 2025 financial year, it has a portfolio of more than **127,000 policyholders** (+4.9%) and **premiums issued reached 38.8 million euros**.

As part of the growth strategy in this segment, in 2023 the company began marketing its Health insurance directly under the Línea Directa brand.

Selling products under its flagship brand, a leader in industry recognition, has allowed the company to increase its operational efficiency and commercial effectiveness, strengthening synergies and cross-selling capabilities. As a result, in 2025, Línea Directa 's growth in health insurance premiums accelerated to 14.7%, an increase 3.3 percentage points higher than the market average, driven by strong growth in its more comprehensive products and those with greater customer loyalty.

### **Other products**

Línea Directa entered the business multi-risk insurance sector in 2025 with the launch of its Business Multi-Risk insurance policy. This new product reflects the company's commitment to innovation as a way to consistently meet its customers' insurance needs.

This insurance for establishments and offices joins others launched in recent years such as Pet Insurance, **Insurance against illegal occupation of housing**, and Personal Mobility Insurance.

In 2024, the Company launched its most comprehensive **Pet Insurance** (dogs and cats), with coverage such as claiming fines and managing penalties, advice for the pet's daily life, tele-veterinary with video consultations and chat, including 24/7 emergency veterinary care, all year round, and supply of electronic prescriptions.

By closing 2025, these products had more than 92,000 customers (+53.5%), with a volume of premiums issued of almost 4 million euros (+132.9%).

### **Sustainable products.**

As part of the company's sustainability strategy, which is articulated through three-year sustainability plans, the Línea Directa Group has been developing and launching various products and services that, in addition to meeting business and growth goals in each of the three sectors in which it operates (Motor, Home and Health), seek to generate a Positive impact on society and the environment.

### **Personal Mobility Insurance.**

In recent years, mobility has undergone a profound transformation, giving rise to new ways of getting around. Among these, the emergence of **personal mobility vehicles (PMVs)**, such as electric scooters and bicycles, stands out. Aware of this new reality, Línea Directa offers Personal Mobility Insurance, the first 100% digital insurance policy for users of all types of PMVs.

This coverage can be purchased on demand: for a single trip on an on/off or pay-per-use basis, or for an entire year. Users can activate and deactivate their insurance through the app, paying only for the actual usage time.

In response to the entry into force of new regulations for approved electric scooters in Spain, which require their owners to have mandatory civil liability insurance with certain minimum coverage limits to guarantee remuneration for personal and material damages in case of an accident, **Línea Directa has developed a new policy in accordance with the new legislation.**

### **Insurance against squatting.**

In 2023, Línea Directa Aseguradora added a unique coverage to its **Multi-Risk insurance policy**, the only one of its kind in Spain, protecting homeowners against the legal and financial consequences of illegal occupation of their property. This coverage, which has been very well received, includes legal assistance from the company and legal costs (lawyer, court representative, expert witness, notary fees, court costs and fees) to recover the home, as well as financial remuneration for expenses related to making the property habitable and other costs.

The product also covers the preparation of the home and remuneration for water, electricity and gas consumption, loss of rental income or in the event of needing alternative accommodation, as well as coverage for damages to third parties caused by the occupation.

In 2024, following its commercial success, the company began to market this coverage as an independent insurance policy separate from the Home policy, and therefore available from then on to customers of other entities.

### **Línea Directa Asistencia.**

The Group has a subsidiary specializing in **roadside assistance and vehicle verification services**, Línea Directa Asistencia. The Group operates through a network of thousands of partners throughout Spain, offering **24/7 year-round assistance** to vehicles and individuals.

Furthermore, thanks to agreements with European partners of Astrum Alliance, a world leader in travel assistance company associations, it is able to provide this service to its Spanish and foreign customers inside and outside of Spain, every day of the year at any time, in Spanish, English, German and Portuguese, both to the vehicle and to the occupants in case of breakdown, accident or theft.

Línea Directa Asistencia offers mobility and roadside assistance solutions through its own team and a broad, experienced network of partners. These services include **digital towing via mobile app**, immediate replacement vehicle, photo verification, mechanical assistance, and vehicle transport for the ITV (Spanish vehicle inspection).

Línea Directa Asistencia also acts as an emergency response center in the different autonomous communities. Thus, if the eCall device located in the vehicle involved in the accident is activated, specialists from the Group's subsidiary contact the customer to manage the emergency. If communication cannot be established, Línea Directa Asistencia alerts the emergency services, providing them with information about the incident and the vehicle's location, thereby shortening medical response times.

### **Centro Avanzado de Reparaciones (CAR).**

In addition to an extensive network of collaborators, made up of more than 1,000 bodywork, mechanical and windscreen workshops, the Línea Directa Group has **two of its own state-of-the-art workshops**, known as **Centro Avanzado de Reparaciones (CAR)**, located in **Madrid** and **Barcelona**.

These workshops offer a comprehensive customer service, from opening the report to repairing the vehicle, always under the high standards of quality, commitment and excellence of the Group.

The Group's two own workshops carried out more than 13,000 repairs in 2024. Of these, CAR Madrid, operational since 2008, repaired 7,076 vehicles (52.7%). CAR Barcelona, opened in 2018, handled 6,342 claims that year (47.3%). In 2025, CAR Madrid reached 6,625 vehicle repairs, while CAR Barcelona carried out 5,525. In total, during 2025, the Línea Directa Group, through its Centro Avanzado de Reparaciones, repaired more than 12,000 vehicles.

The knowledge and information accumulated by both centers have allowed the Group to significantly improve its expertise and innovation capabilities in repair processes, boost quality, and reduce claims costs. In fact, CAR workshops are able to manage all their internal and external processes 100% online, allowing customers to perform a wide range of tasks via the internet, such as changing appointments, requesting a replacement vehicle, or checking the status of their repairs, among others.

All of this translates into excellent user ratings. The **Net Satisfaction Score (NSS) for CAR Barcelona and CAR Madrid stood at 57.18% and 61.67% respectively** at the end of 2025, representing an increase of 16.24 percentage points for CAR Barcelona and 18.88 percentage points for CAR Madrid compared to 2024.

In addition, CAR manages a fleet of replacement vehicles which it makes available to customers free of charge until the repair is completed.

### **Sustainability Plan and goals related to products, services and Stakeholders.**

In line with the **2023-2025 Sustainability Plan**, the Línea Directa Group has made available to the entire population in general in Spain, the market in which it operates, and with a focus also on vulnerable groups, products and services that promote sustainable mobility, the habitability and energy efficiency of homes and the well-being of customers.

Among the main goals defined in the Plan for the 2023-2025 fiscal years, the Group has focused on increasing the number of policies for electric and plug-in hybrid vehicles in its portfolio within the area of car insurance, compared to the previous year. The 2025 fiscal year ended with a portfolio of nearly 60,000 cars and motorcycles with these types of powertrains, representing growth of over 65% compared to 2024.

In the Home insurance sector, the Group's objective for this three-year period was to launch insurance, coverage, or services for homes that prioritize clean energy or energy efficiency. In 2023, **a specific coverage for solar panels was launched**, including **accidental glass breakage**, theft, and even **loss of energy production**, which is currently available.

Regarding the Health sector, the Plan envisioned for 2024 an annual increase in consultations to the telemedicine service, raising the number of users of the telepharmacy service and increasing the percentage of target customers registered in the Vivaz mobile application. Activity for the promotion of healthy habits.

Furthermore, regarding its Health Insurance, the Group launched a **new telemedicine service** in 2025 that provides 24/7 care and allows customers to access personalized online

rehabilitation programs. This service, specifically designed for older adults, facilitates access to treatments without travel and with greater convenience, generating a positive social and environmental impacts.

Regarding its stakeholder relations, given its status as a listed company since 2021, the Línea Directa Group conducted a **review of its stakeholder strategy in 2023**. This provided an opportunity to redefine Stakeholders and clarify how the Group will respond to their expectations in its relationships with them.

This relationship is basically carried out in **two ways, economic or social**, either through its products and services, or through the Group's performance in different areas, and should be understood in a bidirectional way.

Compliance with and varying levels of engagement with Stakeholders can impact the achievement of the Group's strategic goals, hence their importance. Therefore, in 2023, the Stakeholder Map was updated, reviewing prioritization and establishing a strategy and commitments for stakeholder engagement. Furthermore, dialogue and communication channels were updated to ensure better listening to and adaptation to stakeholder expectations, with a view to fostering success in achieving various medium- and long-term goals.

In **2025**, the **Sustainability Working Group monitored and evaluated the key performance indicators** associated with the commitments established in that review. These commitments related to transparency with various Stakeholders, service quality, collaboration with suppliers, the work environment and employee well-being, and partnerships and collaborations with third parties. The results showed a **high level of compliance**, with a response rate exceeding **98%**.

As explained above, one of the goals of the Group's 2023-2025 Sustainability Plan has been the generation of sustainable business through the design, development and promotion of products, services or coverage aimed at promoting sustainable practices in transport, **improving the habitability and energy efficiency of customers' homes** and, in the area of health, improving the **well-being of customers**, especially the most vulnerable.

Thus, in recent years Línea Directa has been launching various products on the market that, in addition to meeting the business and growth goals in each of the three branches in which it operates (Motor, Home and Health), seek to generate a Positive impact on the environment and society.

In 2016, the Group launched an insurance policy with **specific coverage for 100% electric cars**. In line with the goals defined in the Sustainability Plan for this insurance, the Group closed fiscal year 2024 with more than 36,000 electric and plug-in hybrid vehicles in its portfolio and an 8% market share of new registrations in this segment. Fiscal year 2025 ended with a portfolio of nearly 60,000 cars and motorcycles with these types of powertrains, representing growth of over 65%.

On the other hand, in the area of housing, one of the actions included in the Sustainability Plan is the launch of insurance for **energy-efficient homes**. In this regard, the Company has developed and is already marketing coverage for the installation of solar panels in homes, covering damage and theft, as well as losses in energy production.

Similarly, Línea Directa has continued to advance in the planned phases in the development of its insurance against home occupation, first with its launch in 2023 as an additional coverage of the Home insurance, and then, in 2024, following its commercial success, to market this coverage as an independent insurance policy separate from the Home policy, and therefore available to customers of other entities from then on.

Regarding products and services related to the Health sector, the Plan includes boosting its **telemedicine and telepharmacy** services and promoting healthy habits through the

penetration among customers of the mobile activity application, which allows and rewards the monitoring of habits related to physical activity and sleep of users.

The Línea Directa Group's 2023-2025 Sustainability Plan also includes actions related to **responsible marketing**. For example, it aims to ensure the **accessibility of all its digital channels** (corporate website, sales website, and mobile applications) to guarantee universal access for all users.

In this regard, in 2023 the Group first addressed the accessibility of its corporate website, adopting the criteria based on the **WCAG/WAI** (Web Content Accessibility Guidelines) established by the World Wide Web Consortium (W3C), an international consortium that develops recommendations and standards to ensure the safe use and development of the internet. The development of the Línea Directa Group's corporate website was based on compliance with the **accessibility guidelines at the AA level**. A specialized consulting firm conducted an accessibility audit according to these requirements.

In 2024, Línea Directa took a significant step by achieving an elevated level of compliance with the AA standard on its commercial website, guaranteeing inclusive navigation for all users. This certification demonstrates that the company has an advanced level of universal accessibility according to the **European WCAG/WAI 2.1** (Web Content Accessibility Guidelines) guidelines of the W3C (World Wide Web Consortium), which establish three levels: A (minimum requirements), AA (good practices), and AAA (highest level of accessibility).

The implementation of these accessibility criteria has seen noteworthy progress in 2025. The Group has extended its accessibility statement to the Línea Directa Foundation website and has maintained an elevated level of compliance with criteria A and AA on its commercial and corporate websites. Additionally, work has been underway to integrate accessibility criteria into the development of the new customer area and its mobile application, the launch of which will be completed in 2026.

In 2025, the Company continued along the same lines, combining an initiative that also addressed the objective of launching sustainable products, services, and coverage with a **video interpretation service for deaf people**, developed in partnership with the **CNSE Foundation**. This service aims to promote inclusion and accessibility in customer service. It allows customers and non-customers with hearing functional diversity to make inquiries related to Línea Directa's services and products, facilitating insurance purchases, reviewing policy terms and conditions, reporting accidents, and accessing digital channels to request roadside assistance, among many other things.

### **Business model and value chain.**

The Línea Directa Group is a company focused on technology, innovation, and the digitalisation of its processes. The company operates primarily through telephone and digital channels, without a network of branches, and with its operations centralized at its headquarters in Tres Cantos (Madrid).

Línea Directa uses the following key inputs for its activity development:

- **Human Capital:** specialized teams covering diverse areas and fields, such as People, Communication and Sustainability, which manages the Group's human capital and communication based on the Group's commercial, financial and reputational priorities; the Portfolio department, which responds to the needs, concerns and requests of policyholders and is responsible for processes as important as loyalty and retention, among others; the Technical Area, which sets contracting policies and categorizes

commercial profiles according to their risks; and Services and Claims, which guarantees an appropriate response in the area of Claims and services.

In addition, Línea Directa also has the Technology Area, which provides technological support for operations; the Transformation Area, which drives digital innovation and the improvement of processes and tools; Corporate Risks, which constitutes one of the Group's lines of defense; the Commercial Area, which acts as the Group's growth engine through sales; Corporate Quality and Customer Experience, which ensures the excellence of all the Group's processes; Marketing, responsible for generating demand in all distribution channels; Finance, which includes purchasing, treasury, reserves and reinsurance, investor relations and financial information; and the General Secretariat, with responsibility for space management, tax advice, corporate governance, legal advice and data protection.

Finally, Internal Audit constitutes the Group's third line of defense. In addition, the Group also has two Centro Avanzado de Reparaciones (CARs).

- **Material resources:** Línea Directa has a comprehensive network of partner workshops specializing in bodywork, mechanics, and windscreens. In addition, it operates two state-of-the-art Centro Avanzado de Reparaciones (CARs), located in Madrid and Barcelona. These workshops offer comprehensive customer service, from opening a claim to completing the vehicle repair, always adhering to the Group's high standards of quality, commitment, and excellence.

In this regard, it also includes the provision of the necessary materials in the Tres Cantos offices in order to ultimately offer the insurance service.

- **Digital and technological resources:** digital and technological infrastructure necessary for customer management, data analysis and process optimization.

The approach to gathering, developing, and securing these inputs is based on the following issues:

- **Talent management:** continuous training programs, talent attraction and retention to guarantee the development of human capital.
- **Digitalisation:** process optimization through advanced technological platforms for managing customers, other Stakeholders such as suppliers, and data analysis
- **Efficient management** of material resources and the network of collaborators: reduction of physical materials and transition towards more sustainable operations, including the calculation and mitigation of the carbon footprint.

This approach ensures operability, service quality and is geared towards achieving the Group's strategic and sustainable goals.

Through its business model, Línea Directa generates value for its Stakeholders, which include customers, shareholders and investors, employees, and suppliers, among others.

- **Customers:** Línea Directa offers a streamlined and personalized experience through digital and telephone channels, providing insurance products tailored to individual needs. Customers benefit from competitive pricing and efficient customer service, including fast and transparent claims handling. Looking ahead, the Group expects to strengthen its digital offering, enhancing the customer experience with innovative solutions based on artificial intelligence and new technologies.

- **Shareholders and investors:** the company considers it essential to deliver returns to its shareholders through an optimized business model that combines digitalisation, operational efficiency, and sustainability. Dividends for each fiscal year are reported in the financial statements.
- **Employees:** The company offers training and development opportunities, as well as an inclusive environment committed to employee satisfaction. Employees benefit from a flexible work model and Well-being programs, which contribute to their professional and personal growth.
- **Suppliers:** Línea Directa 's suppliers benefit from stable and collaborative business relationships based on principles of transparency, efficiency, and sustainability. Including partner workshops, suppliers have access to a steady flow of operations and demand, enabling them to continue offering their services.

Línea Directa 's value chain is an asset for customers, from product creation to final distribution. In this sense, it has defined its value chain based on three different stages: upstream (earlier phases), own operations, and downstream (later phases).

In the earlier stages of its value chain, Línea Directa relies on, among others, technology, materials, financing, and Health providers. To this end, it maintains a list of suppliers, a list of critical suppliers, and lists of partner companies.

Línea Directa also has an extensive network of body shops, windscreen repair shops, and mechanical workshops, divided between partner and independent providers, as well as roadside assistance, expert appraisal firms, medical assessors, and legal support teams. It also utilizes several external call centers to support distribution, portfolio management, and claims handling, among other processes.

In its operations, Línea Directa operates under its own brand, under its own brands such as Aprecio and Penélope Seguros, and with its state-of-the-art workshops, called **Centro Avanzado de Reparaciones (CAR)**, based in **Madrid** and Barcelona.

In the later stages of its value chain, a distinction can be made between investment operations and services and Claims provided to customers. Regarding investment operations, Línea Directa incorporates ESG criteria into its investment analyses and promotes the effectiveness and objectivity of applying these criteria to the Group's investment decisions, establishing specific sectoral criteria. Furthermore, it aligns its investment portfolio with the decarbonisation goals of the economy and demonstrates its commitment to initiatives such as the United Nations' Principles for Responsible Investment (PRI).

For outsourced services, Línea Directa has a specific policy that ensures that any outsourcing driven by the Group complies with the requirements of the applicable regulations, and in particular Directive 2009/138/EC and implementing regulations (Solvency II), applicable to outsourcing of services related to insurance or reinsurance activity, and the European Digital Operational Resilience Regulation (DORA), applicable to any outsourcing of ICT services.

The total or partial outsourcing of services will be carried out in accordance with the following principles:

- It will adapt to the **quality of service** standards for Línea Directa customers, with service levels and other supplier control clauses being contractually documented.
- It will not in any case imply the transfer or loss of control of the management of the outsourced activity or service by Línea Directa .
- It will not increase or unduly affect the organisation's risk profile.

## Key aspects of the business model and value chain.

### 1. Its main activities, resources, distribution channels and customer segments.

Línea Directa operates in the **motor, multi-risk, and Health sectors**. In addition, the Group has the Centro Avanzado de Reparaciones, its cutting edge workshop with locations in Madrid and Barcelona, and Línea Directa Asistencia, its travel assistance subsidiary.

**Motor insurance** is the core of the Group's business. By the end of fiscal year 2025, it represents 81.4% of the Company's premium revenue (+0.4 percentage points), with income of € 924 million (+11.8%) and 2.73 million customers (+8.6%), representing 73.3% of the Company's total portfolio. These figures solidify Línea Directa Aseguradora position as the sixth largest Spanish motor insurer by premium volume.

The Group has a comprehensive and personalized range of insurance policies for cars, motorcycles, heavy vehicles, personal mobility vehicles and professional vehicles for individuals as well as large companies, SMEs and the self-employed.

The company's product lineup includes traditional options (Comprehensive, Comprehensive with Excess, Extended Third Party, and Third Party) to specialized coverages such as Super Third Party, which extends third-party insurance coverage to include damage to your own vehicle under certain circumstances. In addition, the company offers specific coverage for accidents involving animals and the option to choose between repair and remuneration in some claims. The Línea Directa Group operates in this sector with two other independent brands: Penélope Seguros and Aprecio, a motorcycle insurance company.

**The Home business** line has a premium turnover of € 167.8 million (6.3%) and 776,000 insured homes (+5%). This business line accounts for 14.8% of the Group's revenue and 20.8% of its customer base. According to the latest data published by ICEA as of the date of this report, Línea Directa ranks 13th among Home Insurance companies by business volume, maintaining its position from last year.

Línea Directa Aseguradora also operates in the health insurance sector under its own brand and under the Vivaz brand for group policies. It currently has 127,000 policyholders and € 38.8 million in revenue (+14.7%), maintaining its position for another year among the 25 largest health insurers in Spain.

Growth in this sector is based on its digital nature, the ease and flexibility of its customer experience, the competitiveness of its premiums, and the breadth and quality of its medical network, which, in partnership with a service provider, comprises a wide range of professionals, healthcare centers, and hospitals.

**Línea Directa Asistencia** is the Group's subsidiary specializing in travel assistance services. The Group operates through a network of thousands of partners throughout Spain, offering 24/7, 365 days a year, assistance for vehicles and individuals. Furthermore, thanks to agreements with **European partners in the Astrum Alliance**, it provides this service to its Spanish and international customers, both within and outside of Spain, every day of the year, at any time, in Spanish, English, German, and Portuguese, for both the vehicle and its occupants in the event of a breakdown, accident, or theft.

Línea Directa also has two cutting-edges, known as **Centro Avanzado de Reparaciones** (CAR), located in Madrid and Barcelona. These workshops offer comprehensive customer service, from opening a claim to repairing the vehicle, always adhering to the Group's high standards of quality, commitment, and excellence.

The group's distribution channels are primarily direct, offering insurance via telephone and the internet, with a strong focus on digital and technological channels. Furthermore, the company

employs a sophisticated customer segmentation system that considers variables, most notably claims history, which is key to offering competitive pricing tailored to each policyholder's risk profile.

## **2. Its key business relationships and key characteristics, including relationships with customers and suppliers.**

Línea Directa 's key business relationships are linked to its business model, which is primarily direct and operates without a network of offices. This necessitates strong technological support for the company, both in its internal processes and in its relationships with its main Stakeholders.

One of Línea Directa key business relationships is demand generation, an area in which it has established itself as one of the country's largest advertisers, according to leading specialized monitors such as Infoadex. Operating primarily through direct sales, the company runs powerful advertising campaigns across numerous channels, including digital platforms and mass media, making it one of the most recognized brands in the country.

Regarding customers, Línea Directa fosters the following key strategies:

- Marketing and demand generation actions in the portfolio aimed at cross-selling products.
- Personalized risk underwriting, which allows us to offer prices tailored to each customer's circumstances.
- "Por Ser" loyalty program, aimed at renewing policies upon expiration with significant advantages for customers.
- Enabling digital channels to foster more efficient and immediate dialogue and interaction with customers, such as web support and the corporate app, which facilitates multiple services and processes. In fact, the Línea Directa app allows users to purchase other company products, modify existing policies, join and check loyalty program points, view and attach policy documentation, and even sign it. It also allows users to request roadside assistance without calling, file accident reports, and submit vehicle documentation and photos for damage verification, among other processes.
- Satisfaction surveys: measuring the level of satisfaction and recommendation among policyholders, key to testing the quality levels of each process.
- Value-added services: services aimed at increasing the perception of excellence of the insured.

Most suppliers are primarily linked to earlier stages of the value chain and are categorized according to the nature of their services: technology, materials, financing, and Health, as well as other types. Suppliers linked to services are typically included within the core operations of the value chain, such as workshops (including those owned by the group), the towing network, appraisers, and the medical staff, which is currently outsourced.

The Company's relationships with suppliers are managed through a series of channels included in the Stakeholder Map approved by the Board of Directors. Depending on the nature of the supplier, this relationship may be facilitated through a dedicated website, contact with supplier networks, and the team of coordinators and managers responsible for each process.

To select service providers, specific tenders are held, led by a specialized department, which provides legal certainty regarding the requirements and key criteria for choosing the most suitable partner. Furthermore, depending on the process, they may be categorized by their level of involvement.

**3. The cost structure and revenues of its business segments, in accordance with the disclosure requirements in line with IFRS 8 for the financial statement, where applicable.** Línea Directa's **Motor Insurance segment** experienced an **11.8% increase** in its **net written insurance premiums** (excluding reinsurance) in 2025, reaching **€ 924 million**. The number of customers grew by 8.6%, reaching 2.7 million. Furthermore, the company successfully navigated the inflationary trend observed in the economy in recent years, which particularly impacts Claims. In this regard, Línea Directa improved its claims ratio in the motor insurance sector by 9.2 percentage points, bringing this indicator to 74.7%. This resulted in a combined ratio of 92.80%, compared to 94.8% in 2024.

The **Home insurance** segment saw a 6.3% increase in premiums issued, reaching **€ 167.8 million**. The number of policyholders rose in 2025 to 776,000, a 5% increase compared to 2024. This sector recorded a combined ratio of 87.14%, compared to 88.3% in 2024.

Línea Directa's **Health segment** generated revenues of **€ 38.8 million**, representing a 14.7% increase compared to the previous year. Meanwhile, the number of customers rose to 127,000. The combined ratio improved by 14.55 percentage points, reaching 125.75% in 2025 compared to 140.3%.

Finally, Línea Directa also has other insurance businesses, primarily credit card insurance with financial institutions and the company's new insurance products. As of December 31, 2025, revenue from this activity amounted to € 1.0 million, maintaining the same revenue volume as in 2024.

**4. The impacts, risks and potential opportunities in your sector or significant sectors and their possible relationship with your own business model or your own value chain.**

This Consolidated Non-Financial Information and Sustainability Report presents the second year of reporting under the CSRD Directive. As of the end of the fiscal year, and without the publication or anticipated publication of sector-specific standards, a historical record of the potential risks reported by companies in the sector remains unidentified until a longer period of publication of the corresponding sustainability reports under CSRD regulations becomes available.

## **SBM-2. Interests and views of Stakeholders.**

Línea Directa's commitment to its Stakeholders is included in the **stakeholder map** approved by the Appointments and Remuneration Committee of the Board of Directors, which incorporates its own methodology supported by sources such as Mitchell, Forética or ISO 9001, among others.

According to this methodology, key Stakeholders in Línea Directa are classified into **two levels**: by their relationship and by their **degree of influence**.

The first classification distinguishes between primary and secondary Stakeholders.

Primary Stakeholders are those individuals or companies **directly affected** by the Group's actions, goals, and policies, while secondary Stakeholders are individuals and organisations **indirectly affected** by the business activity. Based on their degree of influence, Línea Directa differentiates between high, medium, and low-influence Stakeholders.

Thus, the Stakeholder Group map, based on degree of influence, is configured as follows:

- **High influence:** shareholders, customers, regulatory bodies and Public Administrations, employees, suppliers, and media.

- **Medium influence:** analysts, proxy advisors, industry associations, opinion leaders, consumer associations and trade unions.
- **Low Influence:** business schools, the third sector, universities, non-customers, potential employees, and society in general.

Based on their relationship, the direct or primary Stakeholders are shareholders, customers, regulatory bodies and public administrations, employees and suppliers, with the rest being secondary Stakeholders.

The **Stakeholder Map** outlines the expectations of each stakeholder group, the Company's commitments, and its goals and communication channels. The Map also includes a pre-established strategy and commitments regarding the relationship with each group, regardless of its classification (primary or secondary, or high, medium, or low influence). Furthermore, it tracks the degree to which the stated goals have been achieved.

Each stakeholder group's relationship is linked to a specific area and department identified in the Línea Directa Stakeholder Map, which are responsible for reporting to the Sustainability Working Group on the relationship developed with each stakeholder, always linked to a specific commitment, objective, and KPI.

The Línea Directa Stakeholder Map identifies Línea Directa 's commitments to each stakeholder, which are summarized below:

- **Shareholders:** dissemination and priority of information and prevention of market abuse, as well as transparency.
- **Customers:** clear contractual information, immediate response, adequate service performance, attention through social networks, positive and comparable experiences across all channels, promotion of the best product at the best price, generation of new products adapted to their needs, providing information about products and services in the commercial channels and keeping the customer informed at the appropriate times and milestones.
- **Regulators and Public Administration:** transparency and facilitating information in a timely manner.
- **Suppliers:** transparency and information in all bidding processes, transparency and periodic information, useful for their management and easily accessible; commitment to medium and long-term and stable collaboration with them and presence of Línea Directa in sectoral and business forums, as well as inviting suppliers to corporate events.
- **Employees:** transparency and frequency in communication and information on the Group's results, active listening and implementation of improvements related to the work environment, ensuring the Línea Directa culture, creating an agile and efficient relationship with the People Area through multichannel responses, caring for employees in vital moments through personalized attention and specific programs, and measuring the Group's internal and external reputation or perception.
- **Media:** transparency, providing information on the most relevant news of the Group, preparing and disseminating reports of relevance and public interest and publishing corporate information promoting its accessibility.
- **Analysts:** participate in the most relevant reports for the Group, provide financial and Non-Financial Information through the Group's public channels and transparency.
- **Consumer Associations:** monitor and provide relevant information to them.

- **Trade Unions:** sustaining open dialogue.
- **Business schools:** collaborating through agreements, posting job openings, conducting programs and events, and supporting entrepreneurs.
- **Third Sector:** implementation of agreements, volunteering activities, donations and solidarity purchases.
- **Universities:** collaboration agreements, publication of vacancies, implementation of programs and events, presentations and attendance at fairs.
- **Non-customers:** promote the best product at the best price, generate new products adapted to their needs, provide information on products and services in commercial channels and ensure responsible advertising.
- **Potential employees:** communicate the Group's activities and culture through various channels, advertise vacancies, and take care of the candidate experience.
- **Society:** to provide information about the Group through different channels, always with the aim of ensuring that the Group has an exemplary and responsible behavior.

Regarding collaboration with Stakeholders, Línea Directa maintains an ongoing dialogue with them, incorporating any improvements or suggestions that could benefit the company. In this respect, the company has launched numerous products over the years based on customer and non-customer feedback, such as customizable Home insurance, comprehensive motorcycle insurance, Health insurance that rewards healthy lifestyle habits, a nighttime assistance **service for young people**, and coverage against illegal occupation of housing, among others.

In addition, where applicable, Línea Directa recognizes and rewards those Stakeholders that, through their commitment, relevance or the quality of their work, contribute to improving Línea Directa 's performance or promoting its economic, social or reputational goals.

In this sense, Línea Directa rewards employees who stand out for their commitment to corporate values, suppliers who have stood out for their excellence, or media outlets that have stood out for their reports in defense of road safety, the social purpose of the Línea Directa Foundation.

### **Focus of the strategy with respect to own workforce.**

The Group has a Code of Ethics that **places people at the heart of its business operations**. In this regard, the Corporate Human Rights Policy, as well as the Code of Ethics, ensures that the impacts of the Business Strategy on the workforce do not generate negative risks. Furthermore, Due Diligence reviews the impacts that Línea Directa generates in its various roles, including as an employer.

It is important to note here that the Group engages with **its workforce to share the business strategy**, as seen in previous requirements, through regular communications from the **CEO to the leadership team**. This includes starting each fiscal year by communicating the overall business strategy and monitoring its progress through various checkpoints. To measure the potential impacts on the workforce (a counterbalance) throughout the year, different opinion surveys are conducted, segmented by department, to understand the current situation and identify any negative impacts or emerging risks.

Similarly, even though there is no elected employee representation within the organisation, the Group maintains an open dialogue with the most representative unions in the sector. The Group has several established union sections that exercise their rights under current regulations, as well as the Human Rights Policy and the Code of Ethics.

Línea Directa, as a member of the sectoral association UNESPA, maintains through this an open channel of dialogue between the unions with the greatest representation and the insurance sector.

### **Focus of the strategy with respect to customers.**

Línea Directa has a Human Rights Policy that aims to guide the protection and respect of these rights, preventing their violation and reflecting the Group's commitment to international, local, and industry standards, such as the United Nations Global Compact, the United Nations Principles for Responsible Investment, and the UN Principles for Sustainable Insurance. In addition to describing how this protection is implemented in its operations, the Policy also outlines Línea Directa's commitments in its operations as an insurer, to its employees as an employer, and to its suppliers as a business partner.

In addition, the Group has a **Human Rights Due Diligence process**. This process includes identifying potential Human Rights violations based on the Group's commitments.

The commitments undertaken encompass five dimensions of the Group, including its relationship with customers as an insurer. The other four dimensions analyzed relate to other Stakeholders, considering its role as an employer, investor, collaborator, and its relationship with society in general. The identification of risk events affecting end consumers is accompanied by a delineation of the negative impacts, both real and potential, and defines the criteria to be considered for their assessment, prioritization, and management. An independent third party participated in defining and developing this process, and the key areas responsible for each of the five dimensions were involved.

The Human Rights due diligence process will be conducted at least every three years. The Human Rights Policy and Due Diligence process establishes a strategy within the Group to identify potential Human Rights risks in business activities and commercial relationships, and to implement mitigation measures.

**As an insurer**, the Group identified the following potential Human Rights violations: responsible marketing, accessibility and discrimination in products and services, and data processing. In addition, the following vulnerable groups were considered for each of the areas outlined in the policy: women, children, immigrants, contractors, and local communities. Attention was also given to senior employees from the perspective of product design and marketing, and to people with functional diversity, both from this perspective and in terms of their integration into the Group's workforce.

Ethics, good corporate governance, and values are an essential part of the **Group's culture** and are applied throughout all its activities and processes, such as transparent information reporting, responsible marketing of its products, financial investment strategy, and supply chain management. In this regard, the Group promotes the responsible and accessible marketing of products and services, as well as customer service that meets the highest quality standards. Based on this principle, Línea Directa adheres to the **UNESPA Guide to Good Practices for Transparency in Insurance Marketing**, which addresses the general principles that should govern insurance marketing by insurance companies in any sales format.

Regarding data protection, the Group has a **Privacy and Data Protection Governance Framework**, a dedicated team, and a data protection officer. It also has a **Privacy Policy** whose main objective is the proper protection of customers' personal and confidential data. To this end, all Línea Directa Group employees must ensure compliance with the general principles of action in this area, as established in the **General Data Protection Policy**.

In the assessment of material IROs, no negative or positive, potential or actual impacts related to responsible marketing and customer satisfaction were identified. This result indicates that the Group does not consider its business activities to play a role in creating or exacerbating significant material impacts.

### **Due Diligence Process.**

Línea Directa Aseguradora Human Rights Due Diligence procedure includes identifying potential Human Rights violations based on the Group's commitments. These commitments made cover five different dimensions: as an employer, as an insurer, as an investor, as a collaborator and partner, and finally, in relation to its environment. Identifying risk events involves defining the actual or potential negative impacts and establishing the criteria to be considered for their assessment, prioritization, and management.

The aspects considered in the role of employer are: equal treatment in human resources management, fair working conditions, freedom in the work environment, the workplace itself, and information security and data protection. As a collaborator and partner, the aspects considered include supplier approval processes, registration and contracting, and risk control and mitigation mechanisms.

The aspects considered in its role as an insurer are responsible marketing, accessibility and non-discrimination in products and services, and guarantees in data processing. As an investor, its role is to invest in stable companies and countries, establish medium- and long-term partnerships, and finally, in relation to its environment, promote Human Rights and contribute to society.

To address the interests and opinions of its Stakeholders, thanks to its business model, based on direct distribution without office networks, Línea Directa develops a continuous dialogue with Stakeholders that allows it to detect expectations, needs and demands.

Through the communication channels contained in the Map, the opinion of each Stakeholder Group is collected, which, on certain occasions, leads to changes and redirections in the Group's approaches, both in the commercial and corporate spheres.

For example, the anti-squatting insurance launched in 2023 arose from dialogue with customers, who expressed their interest in purchasing a product that would provide them with legal protection against the illegal occupation of homes occurring throughout Spain. Furthermore, employee climate surveys help inform decisions based on the concerns, worries, and opinions shared by the workforce. These decisions are made with the aim of improving engagement and the perception of each stakeholder.

In 2025, the Group launched new products that reinforced its **multi-product strategy**, addressing the needs identified among both **customer and non-customer** Stakeholders. These launches aim to provide comprehensive solutions for customers in each business line, leveraging commercial synergies, cross-selling, and further solidifying Línea Directa 's position as a leading insurance group.

In this sense, the products launched in 2025 have contributed to providing a commercial image of a large, multi-product insurance group, always with the aim of continuing to build a company that provides comprehensive solutions to its customers and their needs, increasing synergies, strategic alignment and growth possibilities.

### **Communication with administrative, management and supervisory bodies.**

The administrative, management, and supervisory bodies were informed about the composition of the Stakeholder Map, their expectations, and the commitments made to them. The Sustainability Committee and the relevant departments conduct annual monitoring of relationships with these Stakeholders. This stakeholder assessment and classification system, overseen by the Board of Directors' Appointments and Remuneration Committee, follows the Mitchell methodology, which identifies and prioritizes Stakeholders based on their **relevance and materiality**, and addresses their needs and demands by establishing various measures and resources.

This methodology considers it essential to strengthen relationships with Stakeholders in order to align the organisation's commitments and strategy with each group, thereby ensuring the effectiveness of its actions.

As previously explained, the responsibility for stakeholder relations at Línea Directa lies with the relevant departments, which report their activities, communications, and goals to the Sustainability Working Group. This relationship is managed using the **Stakeholder Scorecard**, which incorporates variables such as stakeholder identification, the department responsible for the relationship, stakeholder expectations, the Group's commitments, and communication channels, among others.

The Sustainability Working Group meets to promote and manage any relevant sustainability issues, including, where appropriate, the status of stakeholder relations. It provides a cross-organisational perspective that transcends departmental management. The Sustainability Working Group, in turn, reports to the Sustainability Committee, comprised of members of the Company's Steering Committee, thus keeping the management team informed of any relevant sustainability matters.

Based on the above, the responsibility for stakeholder relations at Línea Directa lies with the relevant departments, which report their activities, opinions, and demands to the Sustainability Working Group. This relationship is managed using the Stakeholder Scorecard, which incorporates variables such as stakeholder identification, the department responsible for the relationship, stakeholder expectations, the Group's commitments, and communication channels, among others.

The Sustainability Working Group meets to promote and manage any relevant sustainability issues, including, where appropriate, the status of stakeholder relations. It provides a cross-organisational perspective that transcends departmental management. The Sustainability Working Group, in turn, reports to the Sustainability Committee, comprised of members of the Company's Management Committee, thus keeping the management team informed of any relevant sustainability matters.

### **SBM-3. Impacts, risks and opportunities of relative importance and their interaction with the strategy and business model.**

The impacts, risks, and opportunities identified as material for the Línea Directa Group have been linked since the initial identification phase, within the Double Materiality analysis conducted in 2024 and updated in 2025 through consultation with the Sustainability Working Group. In this regard, the identified impacts, risks, and opportunities stem from the strategic lines established by the Group in its Fifth Sustainability Plan 2023-2025 and are identified based on the type of business model and sector. These lines prioritize ESG actions and lead to concrete actions that define the aforementioned Plan, aiming to connect the business strategy with the Group's other strategies and striving for a balance among them.

The **environmental dimension** of the Plan emphasizes environmental management, responsible consumption and circular economy; the Fight against climate change and decarbonisation; and sustainable mobility, home and health.

This dimension is linked to the following sustainable development goals: SDG 7, SDG 11, SDG 12 and SDG 13.

The **social dimension** of the 2023-2025 Sustainability Plan includes the action areas of Diversity, equality and Human Rights; Talent, well-being and culture; the responsible supply chain; Social contribution linked to the business; and the action of corporate volunteering.

Actions in the social dimension impacts SDGs 3, SDGs 4, SDGs 5 and SDGs 10.

The **governance dimension** is comprised of the following pillars: Sustainable products and services; Digitalisation and innovation; Information security; Responsible investment; Ethics, compliance and risk management; Quality: customer centric; and, finally, transparency and dialogue with Stakeholders.

Finally, SDG 8, SDG 9, SDG 16 and SDG 17.

Following the **Double Materiality assessment** conducted by Línea Directa Aseguradora in 2024 and **updated in 2025**, the methodology of which is detailed in section IRO-1 of this chapter, the following impacts, risks, and opportunities have been identified as material. These are broken down by theme, indicating the subtheme to which they belong and their connection to the value chain or the Group's own operations.

In line with these identified IROs, the Group has tools in place to address them, adapting its business model to a changing regulatory, technological, social, and environmental landscape. These tools will be discussed in detail in the chapters corresponding to each material topic, explaining the specific effects that each impacts, risk, and opportunity has on Línea Directa 's business model.

#### Topic: Climate Change Mitigation and Adaptation (ESRS E1 Climate Change)

| Sub-topic                    | Sub-topic linked to ESRS                               | Positive / Negative Risk / Opportunity | IRO Description                                                                                                                 | Value chain                                        |
|------------------------------|--------------------------------------------------------|----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|
| Adaptation to climate change | Climate Change Adaptation<br>Climate Change Mitigation | Positive impact                        | Improved climate management due to the implementation of climate commitments through the corporate environmental strategy       | Upstream - Shareholders and Investors              |
| Adaptation to climate change | Climate Change Adaptation<br>Climate Change Mitigation | Positive impact                        | Supporting customers' adaptation to a lower-carbon economy                                                                      | Upstream - Shareholders and Investors              |
| Adaptation to climate change | Adaptation to climate change                           | Risk                                   | Increase in the severity, frequency, and duration of extreme weather events                                                     | Downstream                                         |
| Adaptation to climate change | Climate Change Adaptation<br>Climate Change Mitigation | Positive impact                        | Reduction of GHG emission levels and contribution to meeting the goals set in the Paris Agreement through the business strategy | Upstream - Shareholders and Investors<br>Suppliers |

## Topic: Responsible marketing and customer satisfaction (ESRS S4 Consumers and end users)

| Sub-topic                                                | Sub-topic linked to ESRS                                                                               | Positive / Negative Risk / Opportunity | IRO Description                                                                                                                                                           | Value chain |
|----------------------------------------------------------|--------------------------------------------------------------------------------------------------------|----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| Customer satisfaction and complaint and claim management | Impacts related to information for consumers or end users. Social inclusion of consumers or end users. | Risk                                   | Providing the service in an inadequate or insufficient manner compared to customer expectations                                                                           | Downstream  |
| Responsible Marketing                                    | Personal safety of consumers or end users. Social inclusion of consumers or end users.                 | Opportunity                            | Promoting innovation within the Company to improve customer well-being and satisfaction through a wide range of specialized products and services tailored to their needs | Downstream  |
| Responsible Marketing                                    | Impacts related to information for consumers or end users. Social inclusion of consumers or end users. | Opportunity                            | Developing a more accessible range of products and services tailored to the needs and characteristics of our customers                                                    | Downstream  |
| Responsible Marketing                                    | Social inclusion of consumers or end users                                                             | Opportunity                            | Implementation of improvements in accessibility and attention to the needs of vulnerable groups through insurance adapted to their specific needs and characteristics     | Downstream  |

## Topic: Safety, health and well-being of workers (ESRS S1 Own Personnel)

| Sub-topic                                 | Sub-topic linked to ESRS | Positive / Negative Risk / Opportunity | IRO Description                                                                                                                        | Value chain                                                         |
|-------------------------------------------|--------------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| Labor standards and employee rights       | Working conditions       | Positive impact                        | Increased job security for employees due to fair working conditions, competitive wages, and the company's open-ended employment model. | Upstream - Shareholders and Investors<br>Own Operations - Employees |
| Employee well-being and work-life balance | Working conditions       | Positive impact                        | Improved employee well-being through the promotion of work-life balance, digital disconnection, social benefits, and healthy habits    | Upstream - Shareholders and Investors<br>Own Operations - Employees |

## Topic: Diversity, equity and inclusion (ESRS S1 Own Personal)

| Sub-topic                       | Sub-topic linked to ESRS                  | Positive / Negative Risk / Opportunity | IRO Description                                                                                                                                                                   | Value chain                                                          |
|---------------------------------|-------------------------------------------|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| Diversity, equity and inclusion | Equal treatment and opportunities for all | Opportunity                            | Increased initiatives and measures that promote the integration and inclusion of diverse groups (individuals with functional diversity) within the workforce and governing bodies | Upstream - Shareholders/ Investors<br>Own Operations - Own workforce |

Topic: Talent Management and Professional Development (ESRS S1 Own workforce)

| Sub-topic                             | Sub-topic linked to ESRS                  | Positive / Negative Risk / Opportunity | IRO Description                                                                                                                                             | Value chain                                                         |
|---------------------------------------|-------------------------------------------|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| Attracting and retaining talent       | Working conditions                        | Opportunity                            | Attracting qualified talent through the perception of the Company as a good employer                                                                        | Own operations                                                      |
| Training and professional development | Equal treatment and opportunities for all | Positive impact                        | Employee satisfaction with the development of their skills within the Company, the expansion of their knowledge, and the possibility of internal promotions | Upstream - Shareholders and Investors<br>Own Operations - Employees |
| Training and professional development | Equal treatment and opportunities for all | Risk                                   | Lack of professional development for workers in new market trends/needs                                                                                     | Own operations                                                      |

Topic: Ethics, good governance and responsible culture (ESRS G1 Business Conduct)

| Sub-topic                                                          | Sub-topic linked to ESRS     | Positive / Negative Risk / Opportunity | IRO Description                                                                                                                                     | Value chain                                                                                             |
|--------------------------------------------------------------------|------------------------------|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|
| Compliance with the Code of Ethics and all other internal policies | Corporate culture            | Positive impact                        | Promoting an ethical culture (such as outreach activities) and acting with integrity towards employees, customers, suppliers and other Stakeholders | Upstream - Shareholders and investors/suppliers<br>Own operations - Employees<br>Downstream - Customers |
| Compliance with the Code of Ethics and all other internal policies | Protection of whistleblowers | Positive impact                        | Promoting transparency regarding reporting channels, both for harassment and the ethics channel                                                     | Upstream - Shareholders and investors/suppliers<br>Own operations - Employees<br>Downstream - Customers |
| Compliance with the Code of Ethics and all other internal policies | Protection of whistleblowers | Risk                                   | Inadequate management of the Ethics Channel, failure to protect, maintain confidentiality and ensure the anonymity of whistleblowers                | Upstream - Shareholders/ Investors<br>Own Operations                                                    |

Subject: Regulatory compliance (Specific to Línea Directa Aseguradora)

| Sub-topic             | Sub-topic linked to ESRS | Positive / Negative Risk / Opportunity | IRO Description                                                | Value chain                                              |
|-----------------------|--------------------------|----------------------------------------|----------------------------------------------------------------|----------------------------------------------------------|
| Regulatory compliance | Entity-specific          | Risk                                   | Regulatory changes that have an economic impacts on the entity | Upstream - Shareholders/ Investors<br><br>Own Operations |

Topic: Risk Management (Specific to Línea Directa Aseguradora)

| Sub-topic                         | Sub-topic linked to ESRS | Positive / Negative Risk / Opportunity | IRO Description                                                                                                                                     | Value chain    |
|-----------------------------------|--------------------------|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Financial and ESG risk management | Entity-specific          | Risk                                   | Inadequate development of strategies and action plans for the management and prevention of unidentified environmental, social, and governance risks | Own operations |

Topic: Digitalisation and innovation (Specific to Línea Directa Aseguradora)

| Sub-topic                                         | Sub-topic linked to ESRS | Positive / Negative Risk / Opportunity | IRO Description                                                                                                | Value chain                    |
|---------------------------------------------------|--------------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------|--------------------------------|
| Efficiency and innovation in business development | Entity-specific          | Positive impact                        | Reduction in the use of material resources and improvement in process efficiency, thanks to digitalisation     | Own operations - own workforce |
| Efficiency and innovation in business development | Entity-specific          | Opportunity                            | Adapting emerging technologies and implementing digital systems that make the Company stand out from its peers | Downstream<br>Own Operations   |

Topic: ESG Product Design (Specific to Línea Directa Aseguradora)

| Sub-topic            | Sub-topic linked to ESRS | Positive / Negative Risk / Opportunity | IRO Description                                                                                                                        | Value chain                  |
|----------------------|--------------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| Sustainable products | Entity-specific          | Opportunity                            | Supporting customers in the energy transition and towards a sustainable economy, as well as offering alternative products and services | Downstream<br>Own Operations |

Topic: Investment with ESG criteria (Specific to Línea Directa Aseguradora)

| Sub-topic              | Sub-topic linked to ESRS | Positive / Negative Risk / Opportunity | IRO Description                                                                                                                                                                                                      | Value chain                                                        |
|------------------------|--------------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|
| Responsible investment | Entity-specific          | Positive impact                        | Contribution to emissions reduction through investment in companies that are committed to the use of renewable energy or projects aimed at reducing their emissions                                                  | Upstream – Shareholders/ investors                                 |
| Responsible investment | Entity-specific          | Opportunity                            | Investment in sectors that contribute to mitigating climate change                                                                                                                                                   | Upstream - Shareholders/ Investors<br>Downstream<br>Own Operations |
| Responsible investment | Entity-specific          | Opportunity                            | Make responsible investments such as real estate assets with good energy certifications, green bonds or blue bonds, and even other investment products that may be considered within article 8 or 9 of SFDR.         | Upstream - Shareholders/ Investors<br>Downstream<br>Own Operations |
| Responsible investment | Entity-specific          | Opportunity                            | Invest in companies that have a clearly environmentally and socially responsible strategy and focus on activities that facilitate the reduction of emissions and the fight against climate change in all its facets. | Upstream - Shareholders/ Investors<br>Downstream<br>Own Operations |

Topic: Cybersecurity and data protection (Specific to Línea Directa Aseguradora)

| Sub-topic                   | Sub-topic linked to ESRS | Positive / Negative Risk / Opportunity | IRO Description                                                                        | Value chain                                                                      |
|-----------------------------|--------------------------|----------------------------------------|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|
| Cybersecurity               | Entity-specific          | Risk                                   | Exposure to a cyberattack due to improper management of information protection systems | Upstream - Suppliers and Shareholders/ Investors<br>Downstream<br>Own Operations |
| Privacy and data protection | Entity-specific          | Risk                                   | Stakeholder data breaches due to system failures or weak oversight                     | Upstream - Suppliers and Shareholders/ Investors<br>Downstream<br>Own Operations |

The current and anticipated effects of these material impacts, risks, and opportunities on the Group positively impacts the business model, strengthening both the Group's market position and its ESG management across the value chain. These effects impacts the entire Línea Directa

Aseguradora value chain, but primarily its core operations, fostering an inclusive, respectful, and stable work environment. Downstream, the Group focuses its operations and efforts on customer well-being and access to quality, sustainable products. In this context, the Group responds to these effects through the implementation of policies, actions, and commitments that reinforce its current and future strategy and decision-making.

In this regard, the Línea Directa Group is also **focusing on the material opportunities** identified by reinforcing its 5th Sustainability Plan 2023-2025 in terms of responsible investment in companies that are committed to sustainable management, sustainable products that support and facilitate the transition for customers, digitalisation of processes through the implementation of emerging technologies, and strengthening its workforce by attracting talent.

Regarding the **positive material impacts** identified in the Double Materiality process, these positively impacts the environment through improved climate management, supporting customers towards a low-carbon economy, and responsible investments, among other effects that promote emissions reduction. With respect to people, the Group's impacts is felt through policies, commitments, and actions in the workplace, prioritizing stability, fair working conditions, and talent attraction, among other factors.

These identified material impacts are related to the type of business model and sector in which the Group operates, as well as to its strategy, since, as mentioned above, they stem from the strategic lines established by the Group in its V Sustainability Plan 2023-2025.

The material impacts identified are mostly short-term, which is the period adopted by the company as the reference period in its financial statements. In this respect, the Group is involved in these impacts both through its business model, for example, by offering sustainable products to its customers, and through its strategy, for example, by implementing new policies, goals, and actions focused on improved environmental, social, and governance (ESG) management of the Group's operations.

The **risks and opportunities** identified in the double materiality exercise were assessed considering both temporal and economic criteria. Thus, considering the **economic valuation**, the **risk or opportunity was assessed** as very low if it affected the financial statements by less than € 50,000; low if it affected between € 50,000 and € 100,000; medium if the impacts was between € 100,000 and € 300,000; high if the impacts on the financial statements was between € 300,000 and € 1,000,000; and finally, risks/opportunities were assessed as very high if their impacts on the financial statements exceeded € 1,000,000.

If the effect of the materialization of the risks/opportunities occurs in the current fiscal year, they were assessed in the short term; if the effect is expected to occur between 2 and 5 years, it was assessed with a medium time horizon; and if the effect is expected to occur in more than 5 years, the time assessment will be long term.

Based on the results of the updated double materiality exercise in 2025, the next IRO re-evaluation planned for 2026 will assess whether changes have been made to the Group's financial situation, due to the strategy defined for managing the risks and opportunities initially defined: whether capital expenditures have been necessary, modifications to business areas, and what financing has been carried out to implement the strategy.

The Línea Directa Group's **strategy and business model** are adapted and developed to provide resilience in the face of the material impacts and risks identified in the Double Materiality analysis. The identification of IROs (Impacts, Risks and Opportunities) in specific areas demonstrates that the exercise is truly aligned with the Group's activities and is integrated into its core values. This allows the strategy and business model to effectively maximize Positive impact, minimize negative impacts and their associated risks, and drive operations to capitalize on identified opportunities.

Regarding material environmental IROs, Línea Directa Aseguradora direct business model, centralized primarily in an operations center serving the entire country, allows it to maintain significant control over its efficiency and demonstrate strong resilience for future periods. In this respect, an environmental management and energy efficiency plan is in place and will be progressively extended to its subsidiaries. Furthermore, in conjunction with digitalisation, the Group has a plan to reduce the use of material resources and improve process efficiency.

Furthermore, this business model, which links the development of its strategy with its corporate purpose of **"Innovate, protect, and bring closer"** has demonstrated its effectiveness by positioning the Group as a multi-product insurer that innovates to launch new products, services, and coverages that positively impacts the society in which it operates. Among these, it has launched products for electric and plug-in hybrid vehicles and electric motorcycles, as well as coverage for the installation of solar panels. The **design of ESG products** is an opportunity that the Group incorporates into its Sustainability Plan, which has achieved the implementation of four sustainable products, services, or coverages by 2025: illegal occupation insurance, solar panel insurance, a video call service for deaf people, and a new telemedicine product.

The Group has thus promoted the launch of products in recent years to foster a sustainable economy in general, protecting consumers from different risks that generate a certain defenselessness and helping them in their decisions to access alternative energy sources, in particular.

Regarding **weather related events**, the Group has updated and published its **Climate Risks and Opportunities Report for 2025**, which assesses climate impacts scenarios for its portfolio. The TCFD (Task Force on Climate Related Financial Disclosure), **published in 2025 with data from 2024**, demonstrates resilience to transition and physical risks. Regarding the identified physical risks, the Group explains how it promotes resilience through modeling, strengthening the circular economy, and geographically diversifying its portfolio. Furthermore, the strategy will include the creation of training and development programs for internal talent to address the new challenges arising from climate change. Finally, the Group has scenarios of increased reinsurance costs and reinsurance requirements for portfolios heavily concentrated in areas with high climate impacts. Línea Directa has a Reinsurance Policy that includes clear limits on the contractable rating level.

Finally, this dimension includes one impacts and several opportunities identified under the theme of ESG investing. The Group approved its adherence to the Principles for Responsible Investment (PRI), promoted by the United Nations, in its 2023-2025 Sustainability Plan. It also has a **Sustainable Investment Policy** that includes provisions for divestiture and exclusion of coal and oil & gas positions. The Group monitors the percentage of its portfolio exposed to these and other controversial issues. The Group has an Investment Committee to which information on this matter is reported. In 2025, it completed its first report on Responsible Investments under the PRI indicators.

Regarding social IROs (Impacts, Risks and Opportunities) related to consumers, Línea Directa, through its **Quality and Customer Experience Department**, continued in 2025 to monitor customer satisfaction and address complaints and claims. This department serves as a key element in the short and medium term for establishing a path to mitigate the risk of customer dissatisfaction. Furthermore, the Group has a dedicated Innovation Department for the creation of **New Products** within the Marketing department. In addition to driving its own projects, this department acts as a catalyst for innovation within the Group, offering training and intrapreneurship programs such as 10x. Finally, to promote greater accessibility for underserved groups, the Group has implemented accessibility features on both its commercial and corporate websites, based on WCAG 2.1 requirements. This strategy was included in its 2023-2025 Sustainability Plan and has been developed accordingly. Furthermore, Línea Directa continues in 2025 with its customer service for deaf people through a video call platform and in collaboration with the State Confederation of Deaf People (CNSE), a non-profit organisation.

In the **social dimension**, and with regard to the IROs (Impacts, Risks and Opportunities), the Group prioritizes the well-being of its employees, focusing on their working conditions, health, and welfare. In fact, its strategy, approved through the 2023-2025 Sustainability Plan and linked to long-term variable remuneration, includes promoting participation in initiatives developed through the Group's Well-being Program. Furthermore, the Diversity Committee, established in 2023, is a body that will continue to ensure diversity, equity, and inclusion within its workforce through 2025. It also promotes professional development, provides training through various programs, and identifies specific needs to incorporate targeted training for its staff. All of this contributes to a strategy for attracting and retaining talent.

In the **Governance dimension**, the Group has a robust ethical governance, which includes a Code of Ethics, a whistleblowing channel that guarantees the anonymity of the whistleblower, an ethics manager who carries out a complete follow-up of the cases and a **Whistleblowing Channel Policy** that articulates the proper management of the channel and is committed to **transparency, protection and confidentiality of whistleblowers**.

On the other hand, the Group has a dedicated Corporate Risks area that maintains a Group-wide risk map, including ESG risks, enabling the establishment of appropriate controls to mitigate identified risks. It also has a Standing Risk Committee. In anticipation of potential regulatory changes that could affect the Group, the Corporate Risks area has a **Regulatory Compliance department** and a **Chief Compliance Officer** responsible for detecting and anticipating all new legislation. It also has a standing body, the Compliance Committee. Both committees report to the Audit and Compliance Committee to keep the Board informed and facilitate strategic adjustments based on the reported situation.

Regarding cybersecurity specifically, the Group recognizes the importance of establishing digital and information security governance. Due to its direct business model, which is driven and transformed through the digitalisation of its operations, the Group conducts an ORSA analysis that includes capital valuation in a global cyberattack scenario. Furthermore, the Group has a Chief Information Security Officer (CISO) and an **Information Security Policy** that ensure compliance with its cybersecurity commitments. It also implements regular audits and security analyses to protect its customers' information.

In 2025, the Group consulted with the Sustainability Working Group, which led to an update of the Double Materiality exercise. As a result of this consultation, there were no changes to the impacts, risks, and opportunities initially defined.

The results of the review of the Double Materiality exercise have been passed on to the Sustainability Committee, who in turn have submitted them to the governing bodies for approval.

Since the CSRD Directive's technical guidelines on assessing financial impacts are still being implemented, the Group has not yet undertaken a specific and comprehensive exercise in quantifying the financial impacts arising from sustainability risks and opportunities.

However, based on the information currently available and the analysis carried out in the context of Double Materiality, no risks or opportunities have been identified that, at this time, are expected to result in significant financial effects or material adjustments to the amounts recognized in the financial statements of the next period.

In this respect, no current financial effects have been identified and the expected financial effects required in this section are not disclosed since the Group is taking advantage of the moratorium on omitting the information of this requirement.

The report includes information on all the companies that make up the Linea Directa Group: Linea Directa Aseguradora S.A., Linea Directa Asistencia, S.L.U., Centro Avanzado de Reparaciones (CAR), S.L.U., Ámbar Medline, S.L.U. and LDActivos, S.L.U.

All of the Group's activity is carried out within Spain. Línea Directa Aseguradora operates entirely centrally, following a highly disintermediated and direct model. Its main office buildings are located in Tres Cantos, Madrid, and it has no other offices in the rest of Spain.

Línea Directa Asistencia, a subsidiary of the Group located in Pozuelo de Alarcón, Madrid, specializes in roadside assistance and vehicle inspection services. The Group operates through a network of thousands of partners throughout Spain, offering 24/7/365 assistance for both vehicles and individuals.

On the other hand, in addition to an extensive network of the insurer's collaborators, made up of more than 1,000 body shops, mechanical workshops and windscreen repair shops, the Group has two of its own state-of-the-art workshops, known as Centro Avanzado de Reparaciones (CAR), located in Madrid and Barcelona.

The Línea Directa brand is one of the insurer's most important strategic assets. It also reflects the Group's identity and essence: a unique and successful approach to insurance, characterized by strength, leadership, and strong values. Since its launch in 1995, the Línea Directa Group has maintained a direct relationship and clear, engaging communication style to stay close to its customers. This, combined with its innovative capacity and the digitalisation of its processes, has allowed the Company to establish itself as one of the leading insurers in the Spanish market and become a major multi-line company. Its channels are primarily telephone and digital, via the internet.

## Impact, risk and opportunity management

### IRO-1. Description of the process for determining and evaluating impacts, risks, and opportunities of relative importance.

#### Double Materiality Process.

Currently, there is a confluence of different sustainability milestones that increase the need to identify and understand which issues are most relevant to an organisation's Stakeholders, in order to respond to their needs and take advantage of the opportunities that arise from this new environment.

**Double Materiality** is based on the importance of identifying aspects that have a direct impacts, whether in real or potential terms, on both the entity (economic risks and opportunities) and its environment (positive and negative impacts).

Double Materiality analysis involves identifying the most relevant aspects for the entity from a dual perspective. That is, it considers both the materiality of the impacts (from the inside out) and the financial materiality (from the outside in), encompassing both direct operations and the entire value chain, both upstream and downstream.

- **Financial Materiality** (from the outside in). Sustainability aspects that entail Risks or Opportunities for the Línea Directa Group by influencing, positively or negatively, its development, reputational position, access to European funds, etc. The Integrated Risk Management System of Línea Directa Aseguradora has been the primary consideration for identifying the IROs (Individual Risk-Opportunities) of Financial Materiality.

- **Impacts Materiality** (from the inside out). Actual or potential impacts, whether positive or negative, caused by the Group on people or the environment in the short-, medium-, and long-term. This encompasses aspects related to both internal operations and the entire value chain, both upstream and downstream, including influence through services, as well as relationships with companies and entities.

The results of this assessment have determined the material Impacts, Risks and Opportunities (IROs) that must be managed through the implementation of action plans.

The methodology used for the preparation of the double materiality analysis carried out in 2024 is described below and consists of the following steps:

#### 1. Context analysis.

The first phase consists of a **contextual analysis of the sector** (external) and the entity's model (internal), the result of which provides an initial assessment of potentially material issues from a cross-cutting sustainability perspective. This allows for an in-depth understanding of the entity and all its areas, as well as the current and future state of the sector.

Furthermore, in this phase, a graphical representation of the **Value Chain** has been developed, including the entities under analysis, the relationships between them, their interactions with Stakeholders, the activities they carry out, and their funding sources. The main objective of this value chain is, once the IROs (Impacts, Risk and Opportunities) have been identified, to place them within each of the links in the chain that they affect.

The following sources of information were used in the context analysis phase:

- **Internal sources:** reports, policies, plans of the Group on the various topics to be analyzed in the analysis

- **External sources:** sustainability reporting frameworks such as GRI and EFRAG, ESG analysts such as S&P, SASB, among others, regulation such as the CNMV annual report.
- **Other sources** such as the World Economic Forum.

These sources will be reviewed and updated periodically to incorporate any updates that occur in any of them into subsequent analyses.

## 2. Preliminary identification of topics and Sub-topics.

To organise the IROs for identification and assessment, a list of topics was first compiled. This facilitates understanding the analysis and allows for determining which aspects are most relevant to the Group. These topics were defined taking into account the **European Sustainability Reporting Standards (ESRS)**, which shape the future of company reporting in accordance with the **new CSRD directive**.

This list of Topics and Sub-topics has been defined from the list of Topics, Sub-topics and Sub-sub-topics proposed in ESRS 1 AR 16.

In turn, these aspects are divided into Sub-topics, which provide a greater degree of granularity to the analysis and allow IROs to be grouped in a more specific way.

## 3. Identification of Impacts, Risks and Opportunities.

A preliminary identification of all the Impacts, Risks and Opportunities of the Group has been carried out, in parallel with the collection of data from surveys carried out on the most relevant Stakeholders for the Group, i.e., employees, customers, shareholders and suppliers

In addition to **stakeholder participation in surveys**, focus groups were conducted with Group employees, as well as interviews with members of Línea Directa Aseguradora management team. The objective of these surveys is to consider stakeholder opinions in **evaluating the topics and Sub-topics** and to obtain a more comprehensive result. Based on the ratings provided by respondents, a scale value is calculated by weighting each stakeholder group according to its relevance and impacts on the organisation, taking into account the stakeholder prioritization established by the Group.

For the identification of the IROs, the information present in the sources used in the first phase of the project has been examined and considered.

- **Impacts:** the effect that the entity's processes, activities, products, services, or relationships have on people or the environment over time.
- **Risk:** uncertain environmental, social or governance events or conditions that, if they occur, could potentially have a negative effect on the entity and its sustainability strategy, on its ability to achieve its goals and goals and to create value, and therefore may condition its decisions and those of its relationships with Stakeholders.
- **Opportunity:** uncertain environmental, social or governance events or conditions that, if they occur, could potentially have a positive effect on the entity and its sustainability strategy, on its ability to achieve its goals and goals, to create value, and therefore may condition its decisions and those of its relationships with Stakeholders.

Impacts provide the perspective of Impacts Materiality, while Risks and Opportunities provide the perspective of Financial Materiality.

For the impacts, risk, and opportunity identification phase, the existing dependencies between material impacts and the identified risks and opportunities were considered, separating and

linking them at the Sub-topic level. In addition, the risks included in the Group's risk map were taken into account, and an exercise was performed to link those IROs that coincided with those previously identified by the entity.

The following details the list of material impacts and their dependencies with identified risks and opportunities:

| ESG | ID  | Issue                                           | Sub-topic                                                          | Rate            | Material impacts                                                                                                                                                    | Departments                                                                                                   |
|-----|-----|-------------------------------------------------|--------------------------------------------------------------------|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| TO  | 1   | Climate change mitigation and adaptation        | Climate change adaptation                                          | Positive impact | Improved climate management due to the implementation of climate commitments through the corporate environmental strategy                                           | ID 6: Implementation of environmental criteria in the strategy and business model                             |
| TO  | 2   | Climate change mitigation and adaptation        | Climate change adaptation                                          | Positive impact | Supporting customers' adaptation to a lower-carbon economy                                                                                                          | ID 15: Increase the exposure of the insurance portfolio to customers who are committed to decarbonisation     |
| TO  | 7   | Climate change mitigation and adaptation        | Transition and mitigation efforts related to Climate change        | Positive impact | Reduction of GHG emission levels and contribution to meeting the goals set in the Paris Agreement through the business strategy                                     | ID 22: Inclusion of higher targets for reducing the carbon footprint associated with the Company's activities |
| S   | 51  | Safety, health and well-being of workers        | Labour standards and employee rights                               | Positive impact | Increased job security for employees due to fair working conditions, competitive wages, and the company's open-ended employment model.                              | ID 68: Attracting qualified talent through the perception of the Company as a good employer                   |
| S   | 56  | Safety, health and well-being of workers        | Employee well-being and work-life balance                          | Positive impact | Improved employee well-being through the promotion of work-life balance, digital disconnection, social benefits, and healthy habits                                 | ID 55: Implementation of new programs to care for the mental health of workers in the workplace               |
| S   | 69  | Talent management and professional development  | Training and professional development                              | Positive impact | Employee satisfaction with the development of their skills within the Company, the expansion of their knowledge, and the possibility of internal promotions         | ID 70: Lack of professional development of workers in new market trends/needs                                 |
| G   | 71  | Ethics, good governance and responsible culture | Compliance with the Code of Ethics and all other internal policies | Positive impact | Promoting an ethical culture (such as outreach activities) and acting with integrity towards employees, customers, suppliers and other Stakeholders                 | Without dependencies                                                                                          |
| G   | 72  | Ethics, good governance and responsible culture | Compliance with the Code of Ethics and all other internal policies | Positive impact | Promoting transparency regarding reporting channels, both for harassment and the ethics channel                                                                     | Without dependencies                                                                                          |
| IS  | 88  | Digitalisation and innovation                   | Efficiency and innovation in business development                  | Positive impact | Reduction in the use of material resources and improvement in process efficiency, thanks to digitalisation                                                          | Without dependencies                                                                                          |
| IS  | 102 | ESG-based investment                            | Responsible investment                                             | Positive impact | Contribution to emissions reduction through investment in companies that are committed to the use of renewable energy or projects aimed at reducing their emissions | ID 110: Investment in sectors that contribute to climate change mitigation                                    |

#### 4. Assessment methodology.

Based on the quantitative data that has been assigned to each IRO, the materiality value of each one has been obtained.

**Impacts.** An assessment of the impacts has been carried out according to the following parameters:

- **Probability of occurrence:** determines the possibility of the Impacts happening or not in the case that it is potential and can be low, medium, high or very high.
- **Scale:** determines the degree of relevance of the impacts for Stakeholders. The Stakeholders consulted for the Impacts Materiality assessment are employees, customers, shareholders, and suppliers.
- **Scope:** determines the physical space affected by each impacts; it can be limited, medium, or global.
- **Remediability:** determines the degree of difficulty (economic and temporal) to return to the state prior to the Impacts if it is negative and can be easy, with effort, difficult, very difficult or irremediable
- **Qualitative Information:** qualitative assessment that complements the assessment and adds additional information of interest to each of the IROs. This is divided into:
  - Justification of quantitative parameters: a justification is provided that indicates the reasoning behind the values of Scope, Probability and Remediability of each IRO.
  - Governance and management: This indicates who the internal body of the Group is responsible for monitoring the IRO, as well as a brief explanation of its responsibilities.
  - Strategy: set of strategies, plans, policies, methodologies, reports and goals established for the management of the IRO if they exist.
  - Time horizon: short, medium or long term

When assessing impacts, it is necessary to incorporate that in the case of an impact that can affect both positively and negatively, negative impacts have been prioritized based on the severity and probability of occurrence and positive impacts based on the magnitude, scope and ultimately the probability.

**Risks.** Risk assessment comprises metrics of financial impacts and the probability of the risk materializing. The midpoint of these economic ranges and the percentage probability of the risk materializing are used to obtain the final result of financial materiality in euros, and this exercise is performed in triplicate, once for each time horizon.

A qualitative assessment of the different risks is carried out for the three scenarios, considering internal and external information according to how it affects the entity in each time horizon.

Economic ranges have been established to define the value of the financial impacts.

- **Probability:** This determines the likelihood of a potential Risk or Opportunity materializing; it can be very low, low, medium, high, or very high. The same thresholds used in the risk map have been employed for the Financial Materiality Probability metric to ensure alignment between the two methodologies.

- **Economic valuation:** Economic valuation is the metric that measures the impacts in economic terms of a risk or opportunity on the entity and can be very low, low, medium, high or very high.

**Opportunities.** The valuation of opportunities comprises metrics of financial impacts and the probability of the opportunity materializing. The midpoint of these economic ranges and the percentage probability of the opportunity materializing are used to obtain the final result of financial materiality in euros, and this exercise is performed in triplicate, once for each time horizon.

A qualitative assessment of the different opportunities for the three scenarios is carried out, considering internal and external information according to how it affects the entity in each time horizon.

Economic ranges have been established to define the value of the financial impacts.

- **Probability:** This determines the likelihood of a potential Risk or Opportunity materializing; it can be very low, low, medium, high, or very high. The same thresholds used in the risk map have been employed for the Financial Materiality Probability metric to ensure alignment between the two methodologies.
- **Economic valuation:** Economic valuation is the metric that measures the impacts in economic terms of a risk or opportunity on the entity and can be very low, low, medium, high or very high.

The correspondence of the risks identified in the Double Materiality exercise with ESG risks registered and documented in the Group's Risk Management System has been established.

In this way, as with any other risk, the identified risks are included in the review and analysis dynamic established by the Corporate Risks area for its control functions, being managed according to the methodological framework and operations in force at any given time.

Regarding the identified Opportunities, a value will be given to the financial impacts and probability, in a justified manner, and based on the context of Línea Directa Aseguradora and its entities, the information obtained through the analyzed documentation, the geopolitical situation, sector information and the regulation.

Once the final list of Impacts, Risks and Opportunities, already classified into their corresponding topics and Sub-topics, is obtained, the evaluation of each of them has been carried out, according to the formulation mentioned above.

## 5. Results.

To obtain the impacts materiality result at the Sub-topic level, the maximum value for each Sub-topic was selected. For Risks and Opportunities, the highest value resulting from the financial materiality of each Sub-topic was used.

To obtain the impacts materiality result for each topic, the maximum score of the highest-scoring Sub-topic for each topic was used.

The maximum values were chosen instead of averaging the IROs for the same Sub-topic, as averaging would diminish the relevance of the final scores. Once the results were obtained, thresholds were calculated to define which topics and Sub-topics were material. In this case, the top 25% of values ( $\geq 75\%$ ), meaning those topics and Sub-topics within the top 25% of the maximum values in either impacts or financial materiality, were considered material.

Based on the overlap of both materialities (impacts and financial), the Línea Directa Group identified 9 material environmental, social and governance (ESG) issues.

### List of material topics and their relationship with ESRS:

- Climate change mitigation and adaptation (ESRS E1 Climate change)
- Responsible marketing and customer satisfaction (ESRS S4 Consumers and end users)
- Safety, health and well-being of workers (ESRS S1 Own Personnel)
- Diversity, equity and inclusion (ESRS S1 Own workforce)
- Talent management and professional development (ESRS S1 Own workforce)
- Ethics, good governance and responsible culture (ESRS G1 Business Conduct)
- Regulatory compliance (Specific to Línea Directa Aseguradora)
- Risk Management (Specific to Línea Directa Aseguradora)
- Digitalisation and innovation (Specific to Línea Directa Aseguradora)
- ESG product design (Specific to Línea Directa Aseguradora)
- Investment with ESG criteria (Specific to Línea Directa Aseguradora)
- Cybersecurity and data protection (Specific to Línea Directa Aseguradora)

These results were approved by the **Group's governing bodies**.

### 6. Review of the double materiality exercise.

In 2025, in order to develop the 2026-2028 Sustainability Plan and to define the content of the sustainability report, the Sustainability Working Group, as an active part of the company's sustainability, has **updated the double materiality exercise**.

To this end, the members of the Sustainability Working Group, compliance with the sustainability governance model, reviewed the material IROs by completing a form, indicating, based on their experience, business vision, and their perception of the company's development, whether they considered that they should remain as material in 2025 or not.

In addition to the list of material IROs, they were asked if they considered it necessary to add any new impacts, risks or opportunities not considered in the initial assessment carried out in 2024.

Following a deliberation session, the Sustainability Working Group decided to submit this review to the Sustainability Committee, which approved maintaining the list of IROs.

The 2026-2028 Sustainability Plan proposes as a line of action for 2026 the full implementation of the Double Materiality exercise, reviewing identification criteria and evaluation methodology of IROs.

This report details the impacts, risks, and opportunities identified through the analysis and outlines the governance, strategy, and management of each of the material IROs.

## **IRO-2. Disclosure requirements established in the ESRS covered by the Consolidated Non-Financial Information Statement and information on the Company's Sustainability.**

As a result of the Double Materiality exercise carried out by the Group, the following issues have been identified as material from both a financial and impacts perspective:

- Climate change mitigation and adaptation through business
- Responsible marketing and customer satisfaction
- Safety, health and well-being of workers
- Diversity, equity and inclusion
- Talent management and professional development
- Ethics, good governance and responsible culture
- Regulatory compliance
- Risk management
- Digitalisation and innovation
- ESG-based investment
- ESG Product Design
- Cybersecurity and data protection

These topics will be disclosed in this Consolidated Non-Financial Information Statement and Sustainability Report, as they have been considered a priority both for their relevance to the Stakeholders and for their impact on the Group's business strategy, according to the methodology set out above.

On the other hand, after a thorough analysis and in accordance with established standards, the Group has concluded that the following issues do not reach a level of relative importance sufficient to be considered material:

- Management of the Group's own environmental impacts (E2, E3, E4, E5): This includes aspects such as pollution, water and marine resources, biodiversity and ecosystems, and resource use and the circular economy. Although their relevance is generally acknowledged, these impacts are limited in relation to the nature of the Group's operations, which do not involve industrial or production processes with a significant environmental impacts.
- Promoting sustainability in the value chain (S2): The Group has identified that, given its business model, the influence on the sustainability of suppliers and the supply chain is moderate compared to other economic sectors.
- Commitment to communities and social impacts (S3): While initiatives are undertaken to contribute to social development, this issue is not considered strategic or a priority in terms of material impacts on business operations or key stakeholder expectations.
- Transparency and dialogue with Stakeholders (ES): Although it is a relevant aspect within good governance practices, it has been assessed that this issue is sufficiently

integrated into existing reporting and governance practices and does not require additional specific consideration in this report.

In all cases, the Group maintains a commitment to continuous improvement and monitoring of these non-material issues to ensure that, should their relevance evolve in the future, the necessary steps are taken to incorporate them into sustainability management and disclosure processes.

Section 4 explains the metrics used to assess IROs (section IRO-1), such as scale, scope, likelihood, and remediability, as well as the weightings used and the different time horizons. Within the same section, subsection 5 describes how materiality thresholds (impacts and financial) are established, selecting the highest values for each topic or Sub-topic as a reference, and how these determine what information is considered material for reporting.

Annex III of this report presents the table required by ESRS 2 in relation to all data points derived from other EU legislation applicable to the Línea Directa Group.

# ENVIRONMENTAL DIMENSION

## Taxonomy

### Disclosure of the EU Taxonomy Regulation.

The aim of publishing the EU taxonomy is to guide capital flows towards sustainable activities, with the main challenge for companies being to adapt their business model towards a low-carbon economy.

### Regulatory context.

In recent years, the European Commission, in the context of the 2015 Paris Agreement on Climate Change and the United Nations 2030 Agenda for Sustainable Development, commissioned a group of technical experts to develop the European Union (EU) strategy for sustainable finance, as part of its commitment to direct capital flows towards sustainable activities.

As a result of this strategy, in December 2021, Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 was published, supplementing Regulation (EU) 2020/852 of the European Parliament and of the Board and laying down the technical selection criteria that an activity must meet in order to contribute substantially to the goals of “Climate Change Mitigation” and “Climate Change Adaptation”.

In June 2023, the European Commission adopted, through Delegated Acts, the technical criteria for the other four established environmental goals, which are: “Water protection”, “Circular economy”, “Pollution prevention” and “Biodiversity and ecosystems”, thus completing the Green Taxonomy.

### Sustainable activities.

The Taxonomy establishes a series of harmonised criteria to determine in a homogeneous way whether an activity or investment is sustainable through the substantial contribution to one of the environmental goals established by the Regulation.

### Indicators.

Línea Directa Aseguradora has assessed both its 2023 business activity and investments based on the methodology established by the Taxonomy. In 2025, Línea Directa reviewed and updated its level of alignment, taking into account the minimum safeguards. Regarding the key indicators of the Investment Portfolio Taxonomy, the Línea Directa Group has constructed the Investment Portfolio Compliance Indicator (ICR) for its assets using the templates in Annexes X and XII of Delegated Regulation (EU) 2021/2178, considering its amendments and adhering to the adaptation period for the new regulations.

## Premiums.

Línea Directa has calculated the proportion and amount of gross premiums written for the non-life and reinsurance business corresponding to activities identified as environmentally sustainable in accordance with the Taxonomy.

The Company's activity corresponds to the activity "Non-Life insurance: insurance against climate-related risks", corresponding to the contribution to the objective of "Adaptation to Climate Change".

The KPIs related to underwriting activities have been calculated as the proportion of gross premiums written for non-life insurance that correspond to eligible underwriting activities, according to the Taxonomy in relation to gross non-life premiums issued.

## Línea Directa Procedure.

Línea Directa has determined the **eligibility** and **alignment** of its **premiums** under the insurance business activity that affects it. In this regard, the European Commission has issued Regulation (EU) 2020/852, which defines which activities are environmentally sustainable. Línea Directa has considered the key indicator of underwriting results for significant non-life insurance and reinsurance companies, in accordance with Annex X of Delegated Regulation (EU) 2021/2178, at a consolidated level. In this respect, there are no significant risks, as it does not operate in any business other than its core insurance activity. Eligible and ineligible Non-Life insurance activities are taken into account, considering all subsidiaries in which it holds a 100% interest.

The KPI related to underwriting activity shows what proportion of all non-life underwriting activities is made up of climate change adaptation activities carried out in accordance with activities 10.1 and 10.2 of Annex II of Delegated Regulation (EU) 2021/2139 of the European Union's Climate Taxonomy.

Indicators have been developed to quantify subscription eligibility, making it traceable and promoting data robustness.

## Eligibility exercise.

Due to the modification of the eligibility criteria compared to previous years in 2023, and coinciding with the third year of analysis of the degree of alignment, Línea Directa has calculated the premium corresponding to those guarantees that contribute significantly to achieving the objective of adaptation to climate change (included in Annex II of Delegated Regulation (EU) 2021/2139, activities 10.1 and 10.2, precisely because of their nature of replacement of damages caused by high-intensity weather phenomena, not covered by the Insurance Remuneration Consortium, in both the Motor and Home branches.

Specifically, in the Motor segment, the Own Damage and Windscreen coverages have been identified, and the impacts on premiums of claims related to weather events have been estimated. An estimate has been made based on the net premium issued for these coverages, establishing a risk premium and a net premium issued for weather-related damage.

For the home segment, the full premium for coverage against atmospheric phenomena and electrical damage has been included, covering damage caused by high-intensity weather events. For the Health sector, no specific coverage has been identified that directly includes coverage for health damage resulting from climate change.

The Technical Screening Criteria (TSC) for the activity were taken into account for the alignment calculation. The following criteria are met for both Motor and Home:

- 1 Underwriting models reflect climate change risks. Furthermore, the Group not only uses historical trends but also considers expected trends and has future projections, gathered both in the ORSA exercise and in the Task Force on Climate-related Financial Disclosures (TCFD). The latter includes managing the impacts, risks, and opportunities of climate change with projections ranging from 5 to 10 years.
- 2 In 2025, for the second consecutive year, the Group published its report on the management and governance of climate change risks and opportunities, guided by the Task Force on Climate-related Financial Disclosures (TCFD). The report outlines the Group's climate change governance model, its approach to managing climate change risks and opportunities, its strategy, goals, and metrics. The report was published in 2025 using data from 2024.
- 3 Policyholders' premiums may be reduced if the insured object meets criteria for lower exposure to atmospheric phenomena.
- 4 Policies are renewed annually, and in the event of a weather event, the Group will provide the terms and conditions for renewing or maintaining coverage at the time of renewal. These terms and conditions may be subject to substantial modifications depending on the history of weather events and their respective damages.
- 5 Insurance policies will be discounted if preventive measures are taken or if there is a lower risk associated with adverse weather events. These measures are explained at the time of purchase.
- 6 The products are marketed by providing all the information on the coverage, including coverage against weather-related risks.
- 7 And it provides information on both measures that benefit the customer and those coverages that can be optional to make their insurance more complete and avoid limited coverage.
- 8 Línea Directa Aseguradora is an insurance company that operates in the Motor, Home, and Health sectors. The company is not authorized by the relevant authorities to underwrite facilities for activities related to fossil fuels (oil, gas, or coal).
- 9 Línea Directa collaborates annually with the CCS, ICEA, UNESPA and the DGSFP by providing them with requested information for analysis and research on climate change issues and society's adaptation to it.
- 10 Línea Directa handles all reported claims in accordance with applicable legislation, taking into account the stipulated deadlines.

### **Compliance with DNSH (Do Not Significant Harm).**

The Group's insurance activity does not conflict with any other environmental objective of the Taxonomy. Línea Directa **committed to mitigating climate change** by implementing measures that minimize its environmental impacts. Furthermore, it does not insure any activity related to the extraction, transport, refining, or distribution of coal, gas, or oil.

On the other hand, its activity **does not have a significant impact** on water resources, the circular economy, pollution, or the goal of biodiversity protection. In this respect, the Group complies with the **Do Not Significant Harm (DNSH)** criteria.

## Social safeguards.

Línea Directa complies with the minimum safeguards established in Articles 3 and 18 of the Taxonomy Regulations regarding Human Rights, corruption, taxation, and fair competition. In this respect, a set of policies (Human Rights Policy, Anti-Corruption Policy, Tax Policy, and its Code of Ethics, among others) defines the company's position on these matters.

The Group has Human Rights Due Diligence procedures in place, which cover employees, suppliers, customers, investors and society in order to prevent violations of fundamental rights.

Línea Directa also part of the United Nations Global Compact, which promotes the fight against child labor, forced labor, and the protection of fundamental rights.

Furthermore, it has procedures in place to monitor and establish disciplinary measures in the event of criminal acts, and it carries out regular training activities to inform its professionals, especially senior management, about all corporate procedures and policies.

Línea Directa has not received any final conviction or sanction for Human Rights violations, corruption or bribery, tax evasion or for not respecting competition laws during the year 2025.

## Asset taxonomy.

The Línea Directa Group has built the ICR of its Asset Taxonomy following the templates of Annexes X and XII of Delegated Regulation (EU) 2021/2178, taking into account its modifications.

Under the regulatory context of the European Taxonomy, the proportion of the Group's investments aimed at financing activities that conform to the taxonomy or linked to these activities has been calculated in relation to total investments, based on turnover and on the basis of investments in fixed assets or CAPEX.

To this end, all consolidated balance sheet assets were identified and included in the denominator, excluding exposures to central governments, central banks, and supranational issuers. The various assets included in the denominator include exposures to:

- Financial and non-financial companies not subject to Articles 19a and 29a of Directive 2013/34/EU, (outside NFRD and within the EU)
- Financial and non-financial companies from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU (Outside the NFRD and outside the EU)
- Financial and non-financial companies subject to Articles 19a and 29a of Directive 2013/34/EU
- Derivatives
- Other counterparties and assets (including deposits, owned and income-producing real estate, intangible fixed assets, among others)
- The numerator includes, according to the taxonomy, the proportion of the exposures that:
- They conform to the taxonomy for financial and non-financial companies subject to articles 19 bis and 29 bis.

- They are not investments connected to life insurance contracts under which the investment risk is borne by the policyholders, which are intended to finance activities that fit the taxonomy or are linked to these activities.
- They conform to the taxonomy compared to other counterparties and assets.

To perform the alignment exercise, 100% of investments were considered, excluding categories not included in the taxonomy. Since there are no off-balance-sheet assets, the total covered assets and the total managed assets are the same, meaning there is 100% coverage.

To calculate the alignment and eligibility of exposures to financial and non-financial companies within the NFRD (Non-Financial Reporting Directive), primary data sources have been used, analyzing all the information published through Non-Financial Information reports by these entities during 2025, with respect to the 2024 financial year.

Regarding the information analysed, for the Investment Funds, it was not possible to access information on the portfolio alignment percentage due to a lack of data. Línea Directa has Investment Funds composed of listed companies, debt securities, and venture capital. In these cases, information on the underlying assets is not available.

Regarding real estate, most of it is for own use and has not been included in the numerator because it is not considered an investment, and the rest of the real estate investments do not meet all the technical criteria of activity 7.7 of Delegated Regulation (EU) 2021/2139.

Finally, information on activities related to fossil gas and nuclear energy is published in accordance with the public disclosure requirements of Delegated Regulation (EU) 2022/1214. The templates below contain information on the exposures of portfolio companies engaged in activities related to fossil gas and nuclear energy.

### **Metrics related to the EU Taxonomy.**

The commitments made in the Sustainable Investment Policy are reflected in the results of aligning Línea Directa 's investment portfolio with the EU Taxonomy.

In 2025, the Group achieved a **14% portfolio eligibility rate by business volume**, exceeding the previous year's result by 1.1 percentage points, and a **4.56% alignment rate**, 1.1 percentage points higher than the previous year; by **CAPEX**, the Group achieved a **15.1% eligibility rate**, 1.8 percentage points higher than in 2024, and a **6.87% alignment rate**, improving by 1.8 percentage points compared to the previous year.

In the case of the **Non-Life and Reinsurance Premium Taxonomy**, **100% of eligible premiums** are aligned with the CTS, the Do Not Significant Harm principle and safeguards.

## Taxonomy of premiums 2025 and 2024

| Economic activities (1)                                                                                                                                             | Substantial contribution      |                           |                                      | Absence of significant harm ("It does not cause significant harm") |                                |                      |               |                                 |                         |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|---------------------------|--------------------------------------|--------------------------------------------------------------------|--------------------------------|----------------------|---------------|---------------------------------|-------------------------|
|                                                                                                                                                                     | Absolute premiums, year t (2) | Premium ratio, year t (3) | Proportion of premiums, year t-1 (4) | Climate change mitigation (5)                                      | Water and marine resources (6) | Circular economy (7) | Pollution (8) | Biodiversity and ecosystems (9) | Minimum guarantees (10) |
|                                                                                                                                                                     | Euros                         | %                         | %                                    |                                                                    |                                |                      |               |                                 |                         |
| <b>A.1. Non-life insurance and reinsurance underwriting activities that conform to the Taxonomy (environmentally sustainable)</b>                                   | <b>21.272,8</b>               | <b>1,9 %</b>              | <b>1,7 %</b>                         | S                                                                  | S                              | S                    | S             | S                               | S                       |
| A.1.1 Of which, reinsured                                                                                                                                           | 0,0                           | 0,0 %                     | 0,0 %                                |                                                                    |                                |                      |               |                                 |                         |
| A.1.2 Of which, derived from reinsurance activity                                                                                                                   | 0,0                           | 0,0 %                     | 0,0 %                                |                                                                    |                                |                      |               |                                 |                         |
| A1.2.1 Of which, reinsured (retrocession)                                                                                                                           | 0,0                           | 0,0 %                     | 0,0 %                                |                                                                    |                                |                      |               |                                 |                         |
| <b>A.2 Non-life insurance and reinsurance activities eligible under the Taxonomy, but not environmentally sustainable (activities that do not fit the taxonomy)</b> | <b>0,0</b>                    | <b>0,0 %</b>              | <b>0,0 %</b>                         |                                                                    |                                |                      |               |                                 |                         |
| <b>B. Non-life insurance and reinsurance activities not eligible according to the Taxonomy</b>                                                                      | <b>1.113.397,2</b>            | <b>98,1 %</b>             | <b>98,3 %</b>                        |                                                                    |                                |                      |               |                                 |                         |
| <b>Total (A.1 + A.2 + B)</b>                                                                                                                                        | <b>1.134.670,0</b>            | <b>100,0 %</b>            | <b>100,0 %</b>                       |                                                                    |                                |                      |               |                                 |                         |

## Taxonomy of Investments 2025

| <b>Template: Ratio of investments of insurance or reinsurance companies directed to the financing of activities which comply with the taxonomy or are linked to these activities in relation to total investments</b>                                                                                                                     |        |                                                                                                                                                                                                                                                                                                          |               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| The weighted average value of all investments by insurance or reinsurance companies aimed at financing economic activities that conform to the taxonomy or are linked to these activities, in relation to the value of total assets covered by the key performance indicator, with the following weightings for investments in companies: |        | The weighted average value of all investments by insurance or reinsurance companies aimed at financing economic activities that conform to the taxonomy or are linked to these activities, with the following weightings for investments in companies:                                                   |               |
| Based on turnover:%                                                                                                                                                                                                                                                                                                                       | 4,6%   | Based on turnover: [monetary value]                                                                                                                                                                                                                                                                      | 41.901.193 €  |
| Based on investments in fixed assets:%                                                                                                                                                                                                                                                                                                    | 6,9%   | Based on investments in fixed assets: [monetary value]                                                                                                                                                                                                                                                   | 63.185.680 €  |
| The percentage of assets covered by the key performance indicator in relation to the total investments of insurance or reinsurance companies (total assets under management). Excluding investments in sovereign entities.                                                                                                                |        | The monetary value of the assets covered by the key performance indicator. Except for investments in sovereign entities.                                                                                                                                                                                 |               |
| Coverage ratio:%                                                                                                                                                                                                                                                                                                                          | 100,0% | Coverage: [monetary amount]                                                                                                                                                                                                                                                                              | 919.093.716 € |
| <b>Additional and supplementary disclosures: breakdown of the denominator of the key performance indicator</b>                                                                                                                                                                                                                            |        |                                                                                                                                                                                                                                                                                                          |               |
| The percentage of derivatives in relation to total assets covered by the key performance indicator. X%                                                                                                                                                                                                                                    | 0,5%   | The monetary value of derivatives. [monetary amount]                                                                                                                                                                                                                                                     | 5.061.795 €   |
| The proportion of exposures to financial and non-financial companies not subject to Articles 19a and 29a of Directive 2013/34/EU in the total assets covered by the key performance indicator:                                                                                                                                            |        | Value of exposures to financial and non-financial companies not subject to Articles 19a and 29a of Directive 2013/34/EU:                                                                                                                                                                                 |               |
| Non-financial companies:                                                                                                                                                                                                                                                                                                                  | 11,5%  | Non-financial companies [monetary amount]:                                                                                                                                                                                                                                                               | 105.245.251 € |
| Financial companies:                                                                                                                                                                                                                                                                                                                      | 12,4%  | Financial companies [monetary amount]:                                                                                                                                                                                                                                                                   | 113.544.512 € |
| The proportion of exposures to financial and non-financial companies from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU in total assets covered by the key performance indicator:                                                                                                                          |        | Value of exposures to financial and non-financial companies from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:                                                                                                                                                           |               |
| Non-financial companies:                                                                                                                                                                                                                                                                                                                  | 8,8%   | Non-financial companies [monetary amount]:                                                                                                                                                                                                                                                               | 81.157.412 €  |
| Financial companies:                                                                                                                                                                                                                                                                                                                      | 12,4%  | Financial companies [monetary amount]:                                                                                                                                                                                                                                                                   | 113.544.512 € |
| The proportion of exposures to financial and non-financial companies subject to Articles 19a and 29a of Directive 2013/34/EU in total assets covered by the key performance indicator:                                                                                                                                                    |        | Value of exposures to financial and non-financial companies subject to Articles 19a and 29a of Directive 2013/34/EU:                                                                                                                                                                                     |               |
| Non-financial companies:                                                                                                                                                                                                                                                                                                                  | 18,8%  | Non-financial companies [monetary amount]:                                                                                                                                                                                                                                                               | 173.171.264 € |
| Financial companies:                                                                                                                                                                                                                                                                                                                      | 20,6%  | Financial companies [monetary amount]:                                                                                                                                                                                                                                                                   | 189.287.552 € |
| The proportion of exposures to other counterparties and assets in the total assets covered by the key performance indicator: X%                                                                                                                                                                                                           | 36,2%  | Value of exposures to other counterparties and assets: [monetary amount]                                                                                                                                                                                                                                 | 332.781.225 € |
| The proportion of investments by insurance or reinsurance companies, other than investments related to life insurance contracts whereby the investment risk is borne by the policyholders, that are used to finance activities that fit the taxonomy or are linked to these activities: X%                                                | 100,0% | Value of investments of insurance or reinsurance companies other than investments related to life insurance contracts under which the investment risk is borne by the policyholders, which are intended to finance activities that fit the taxonomy or are linked to these activities: [monetary amount] | 919.091.600 € |
| The value of all investments that finance economic activities that are not eligible according to the taxonomy in relation to the value of total assets covered by the key performance indicator:                                                                                                                                          |        | Value of all investments that finance economic activities that are not eligible according to the taxonomy:                                                                                                                                                                                               |               |
| Based on turnover:%                                                                                                                                                                                                                                                                                                                       | 86,0%  | Based on turnover: [monetary value]                                                                                                                                                                                                                                                                      | 790.427.532 € |
| Based on investments in fixed assets:%                                                                                                                                                                                                                                                                                                    | 84,9%  | Based on investments in fixed assets: [monetary value]                                                                                                                                                                                                                                                   | 780.442.366 € |
| The value of all investments that finance eligible economic activities according to the taxonomy, but which do not conform to the taxonomy, in relation to the value of total assets covered by the key performance indicator:                                                                                                            |        | Value of all investments that finance eligible economic activities according to the taxonomy, but that do not fit the taxonomy:                                                                                                                                                                          |               |
| Based on turnover:%                                                                                                                                                                                                                                                                                                                       | 9,4%   | Based on turnover: [monetary value]                                                                                                                                                                                                                                                                      | 86.762.876 €  |
| Based on investments in fixed assets:%                                                                                                                                                                                                                                                                                                    | 8,2%   | Based on investments in fixed assets: [monetary value]                                                                                                                                                                                                                                                   | 75.463.554 €  |

| <b>Additional and supplementary disclosures: Breakdown of the numerator of the key performance indicator</b>                                                                                                                                                                                              |      |                                                                                                                                                                                                                                                                                                 |              |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| The proportion of taxonomy compliant exposures to financial and non-financial companies subject to Article 19 a and 29a in total assets covered by the key performance indicator:                                                                                                                         |      | Value of taxonomy compliant exposures to financial and non-financial companies subject to Articles 19a and 29 a:                                                                                                                                                                                |              |
| Non-financial companies                                                                                                                                                                                                                                                                                   |      | Non-financial companies                                                                                                                                                                                                                                                                         |              |
| Based on turnover:%                                                                                                                                                                                                                                                                                       | 3,9% | Based on turnover: [monetary value]                                                                                                                                                                                                                                                             | 36.078.575 € |
| Based on investments in fixed assets:%                                                                                                                                                                                                                                                                    | 6,2% | Based on investments in fixed assets: [monetary value]                                                                                                                                                                                                                                          | 56.684.651 € |
| Financial companies:                                                                                                                                                                                                                                                                                      |      | Financial companies:                                                                                                                                                                                                                                                                            |              |
| Based on turnover:%                                                                                                                                                                                                                                                                                       | 0,6% | Based on turnover: [monetary value]                                                                                                                                                                                                                                                             | 5.822.618 €  |
| Based on investments in fixed assets:%                                                                                                                                                                                                                                                                    | 0,7% | Based on investments in fixed assets: [monetary value]                                                                                                                                                                                                                                          | 6.501.029 €  |
| The proportion of investments of insurance or reinsurance companies, other than investments related to life insurance contracts under which the investment risk is borne by the policyholders, which are directed to finance activities which comply with the taxonomy or are linked to these activities: |      | Value of investments of insurance or reinsurance companies other than investments related to life insurance contracts under which the investment risk is borne by the policyholders, which are directed to finance activities which comply with the taxonomy or are linked to these activities: |              |
| Based on turnover:%                                                                                                                                                                                                                                                                                       | 4,6% | Based on turnover: [monetary value]                                                                                                                                                                                                                                                             | 41.901.193 € |
| Based on investments in fixed assets:%                                                                                                                                                                                                                                                                    | 6,9% | Based on investments in fixed assets: [monetary value]                                                                                                                                                                                                                                          | 63.185.680 € |
| The proportion of taxonomy compliant exposures versus other counterparties and assets in the total assets covered by the key performance indicator:                                                                                                                                                       |      | Value of taxonomy compliant exposures to other counterparties and assets in relation to the total assets covered by the key performance indicator                                                                                                                                               |              |
| Based on turnover:%                                                                                                                                                                                                                                                                                       | —%   | Based on turnover: [monetary value]                                                                                                                                                                                                                                                             | - €          |
| Based on investments in fixed assets:%                                                                                                                                                                                                                                                                    | —%   | Based on investments in fixed assets: [monetary value]                                                                                                                                                                                                                                          | - €          |

| <b>Breakdown of the numerator of the key performance indicator by environmental objective</b>                                        |                        |     |                                    |    |
|--------------------------------------------------------------------------------------------------------------------------------------|------------------------|-----|------------------------------------|----|
| Activities that fit the taxonomy, provided that the assessment of social guarantees and the absence of significant harm is positive: |                        |     |                                    |    |
| 1) Climate change mitigation                                                                                                         | In terms of turnover:% | 0 € | Transition activities:% (turnover) | 0% |
|                                                                                                                                      |                        |     | Transition activities:% (CapEx)    | 0% |
|                                                                                                                                      | CapEx:%                | 0 € | Enabling activities:% (turnover)   | 0% |
|                                                                                                                                      |                        |     | Enabling activities:% (CapEx)      | 0% |
| 2) Adaptation to climate change                                                                                                      | In terms of turnover:% | 0 € | Enabling activities:% (turnover)   | 0% |
|                                                                                                                                      | CapEx:%                | 0 € | Enabling activities:% (CapEx)      | 0% |
| 3) Sustainable use and protection of water and marine resources                                                                      | In terms of turnover:% | 0 € | Enabling activities:% (turnover)   | 0% |
|                                                                                                                                      | CapEx:%                | 0 € | Enabling activities:% (CapEx)      | 0% |
| 4) Transition to a circular economy                                                                                                  | In terms of turnover:% | 0 € | Enabling activities:% (turnover)   | 0% |
|                                                                                                                                      | CapEx:%                | 0 € | Enabling activities:% (CapEx)      | 0% |
| 5) Pollution prevention and control                                                                                                  | In terms of turnover:% | 0 € | Enabling activities:% (turnover)   | 0% |
|                                                                                                                                      | CapEx:%                | 0 € | Enabling activities:% (CapEx)      | 0% |
| 6) Protection and restoration of biodiversity and ecosystems                                                                         | In terms of turnover:% | 0 € | Enabling activities:% (turnover)   | 0% |
|                                                                                                                                      | CapEx:%                | 0 € | Enabling activities:% (CapEx)      | 0% |

|                                                                                                                                                                                                                                                                                                                                     |     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| <b>ANNEX XII</b>                                                                                                                                                                                                                                                                                                                    |     |
| Template 1: Activities related to nuclear energy and fossil gas                                                                                                                                                                                                                                                                     |     |
| <b>Activities related to nuclear energy</b>                                                                                                                                                                                                                                                                                         |     |
| The company undertakes, finances or has exposure to the research, development, demonstration and implementation of innovative electricity generation facilities that produce power from nuclear processes with minimal fuel cycle waste.                                                                                            | NO  |
| The company undertakes, finances or has exposure to the construction and safe operation of new nuclear facilities to produce electricity or process heat, including for district heating purposes or industrial processes such as hydrogen production, as well as their safety improvements, using the best available technologies. | NO  |
| The company undertakes, finances, or has exposure to the safe operation of existing nuclear facilities that produce electricity or process heat, including for district heating purposes or industrial processes such as the production of hydrogen from nuclear power, as well as their safety improvements.                       | YES |
| <b>Activities related to fossil gas</b>                                                                                                                                                                                                                                                                                             |     |
| The company undertakes, finances or has exposure to the construction or operation of electricity generation facilities that produce electricity from gaseous fossil fuels.                                                                                                                                                          | YES |
| The company undertakes, finances or has exposure to the construction, renovation and operation of combined heat/cooling and electricity generation facilities that use gaseous fossil fuels.                                                                                                                                        | YES |
| The company undertakes, finances or has exposure to the construction, renovation and operation of heat generation facilities that produce heat/cold from gaseous fossil fuels.                                                                                                                                                      | NO  |

**Template 2: Taxonomy compliant activities (denominator)**

| Economic activities                                                                                                                                                                               | Amount and proportion (information must be presented in monetary amounts and percentages) |                      |               |               |                                 |                      |               |               |                                 |              |              |             |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|----------------------|---------------|---------------|---------------------------------|----------------------|---------------|---------------|---------------------------------|--------------|--------------|-------------|
|                                                                                                                                                                                                   | CCM + CCA                                                                                 |                      |               |               | Climate change mitigation (CCM) |                      |               |               | Climate Change Adaptation (CCA) |              |              |             |
|                                                                                                                                                                                                   | Turnover                                                                                  | Capex                | Turnover (%)  | Capex (%)     | Turnover                        | Capex                | Turnover (%)  | Capex (%)     | Turnover                        | Capex        | Turnover (%) | Capex (%)   |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0,0 €                                                                                     | 0,0 €                | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €                | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0,0 €                                                                                     | 0,0 €                | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €                | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 79.499 €                                                                                  | 157.885 €            | 0,0%          | 0,0%          | 79.499 €                        | 157.885 €            | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 766.360 €                                                                                 | 954.830 €            | 0,0%          | 0,0%          | 766.360 €                       | 954.830 €            | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 18.864 €                                                                                  | 37.592 €             | 0,0%          | 0,0%          | 18.864 €                        | 37.592 €             | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0,0 €                                                                                     | 0,0 €                | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €                | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| <b>Amount and proportion of other economic activities that fit the taxonomy not mentioned in rows 1 to 6 in the denominator of the applicable ICR</b>                                             | <b>918.228.992 €</b>                                                                      | <b>917.943.408 €</b> | <b>100,0%</b> | <b>100,0%</b> | <b>918.228.992 €</b>            | <b>917.943.408 €</b> | <b>100,0%</b> | <b>100,0%</b> | <b>0,0 €</b>                    | <b>0,0 €</b> | <b>0,0%</b>  | <b>0,0%</b> |
| <b>Total applicable ICR</b>                                                                                                                                                                       | <b>919.093.716 €</b>                                                                      | <b>919.093.716 €</b> | <b>100,0%</b> | <b>100,0%</b> | <b>919.093.716 €</b>            | <b>919.093.716 €</b> | <b>100,0%</b> | <b>100,0%</b> | <b>0,0 €</b>                    | <b>0,0 €</b> | <b>0,0%</b>  | <b>0,0%</b> |

**Table 3 Taxonomy-compliant economic activities (numerator)**

| Economic activities                                                                                                                                                                             | Amount and proportion (information should be presented in monetary amounts and percentages) |                     |               |               |                                 |                     |               |               |                                 |              |              |             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|---------------------|---------------|---------------|---------------------------------|---------------------|---------------|---------------|---------------------------------|--------------|--------------|-------------|
|                                                                                                                                                                                                 | CCM + CCA                                                                                   |                     |               |               | Climate change mitigation (CCM) |                     |               |               | Climate Change Adaptation (CCA) |              |              |             |
|                                                                                                                                                                                                 | Turnover                                                                                    | Capex               | Turnover (%)  | Capex (%)     | Turnover                        | Capex               | Turnover (%)  | Capex (%)     | Turnover                        | Capex        | Turnover (%) | Capex (%)   |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable ICR | 0,0 €                                                                                       | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable ICR | 0,0 €                                                                                       | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable ICR | 0,0 €                                                                                       | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable ICR | 0,0 €                                                                                       | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable ICR | 0,0 €                                                                                       | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable ICR | 0,0 €                                                                                       | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| <b>Amount and proportion of other economic activities that fit the taxonomy not mentioned in rows 1 to 6 in the numerator of the applicable ICR</b>                                             | <b>41.901.193 €</b>                                                                         | <b>63.185.680 €</b> | <b>100,0%</b> | <b>100,0%</b> | <b>41.901.193 €</b>             | <b>63.185.680 €</b> | <b>100,0%</b> | <b>100,0%</b> | <b>0,0 €</b>                    | <b>0,0 €</b> | <b>0,0%</b>  | <b>0,0%</b> |
| <b>Total amount and proportion of economic activities that fit the taxonomy in the numerator of the applicable ICR</b>                                                                          | <b>41.901.193 €</b>                                                                         | <b>63.185.680 €</b> | <b>100,0%</b> | <b>100,0%</b> | <b>41.901.193 €</b>             | <b>63.185.680 €</b> | <b>100,0%</b> | <b>100,0%</b> | <b>0,0 €</b>                    | <b>0,0 €</b> | <b>0,0%</b>  | <b>0,0%</b> |

**Template 4: Economic activities eligible according to the taxonomy but which do not comply with it**

| Economic activities                                                                                                                                                                                                                              | Amount and proportion (information must be presented in monetary amounts and percentages) |                     |               |               |                                 |                     |               |               |                                 |              |              |             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|---------------------|---------------|---------------|---------------------------------|---------------------|---------------|---------------|---------------------------------|--------------|--------------|-------------|
|                                                                                                                                                                                                                                                  | CCM + CCA                                                                                 |                     |               |               | Climate change mitigation (CCM) |                     |               |               | Climate Change Adaptation (CCA) |              |              |             |
|                                                                                                                                                                                                                                                  | Turnover                                                                                  | Capex               | Turnover (%)  | Capex (%)     | Turnover                        | Capex               | Turnover (%)  | Capex (%)     | Turnover                        | Capex        | Turnover (%) | Capex (%)   |
| Amount and proportion of eligible economic activity according to the taxonomy but not conforming to the taxonomy referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0,0 €                                                                                     | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of eligible economic activity according to the taxonomy but not conforming to the taxonomy referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0,0 €                                                                                     | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of eligible economic activity according to the taxonomy but not conforming to the taxonomy referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0,0 €                                                                                     | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of eligible economic activity according to the taxonomy but not conforming to the taxonomy referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 1.197.472,0 €                                                                             | 1.340.215,0 €       | 1,0%          | 2,0%          | 1.197.472,0 €                   | 1.340.215,0 €       | 1,0%          | 2,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of eligible economic activity according to the taxonomy but not conforming to the taxonomy referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 57.290,0 €                                                                                | 51.532,0 €          | 0,0%          | 0,0%          | 57.290,0 €                      | 51.532,0 €          | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| Amount and proportion of eligible economic activity according to the taxonomy but not conforming to the taxonomy referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0,0 €                                                                                     | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €               | 0,0%          | 0,0%          | 0,0 €                           | 0,0 €        | 0,0%         | 0,0%        |
| <b>Amount and proportion of other eligible economic activities according to the taxonomy but not conforming to the taxonomy not mentioned in rows 1 to 6 above in the denominator of the applicable ICR</b>                                      | <b>85.508.114 €</b>                                                                       | <b>74.071.807 €</b> | <b>99,0%</b>  | <b>98,0%</b>  | <b>85.508.114 €</b>             | <b>74.071.807 €</b> | <b>99,0%</b>  | <b>98,0%</b>  | <b>0,0 €</b>                    | <b>0,0 €</b> | <b>0,0%</b>  | <b>0,0%</b> |
| <b>Amount and proportion of eligible economic activities according to the taxonomy but not conforming to the taxonomy in the denominator of the applicable ICR</b>                                                                               | <b>86.762.876 €</b>                                                                       | <b>75.463.554 €</b> | <b>100,0%</b> | <b>100,0%</b> | <b>86.762.876 €</b>             | <b>75.463.554 €</b> | <b>100,0%</b> | <b>100,0%</b> | <b>0,0 €</b>                    | <b>0,0 €</b> | <b>0,0%</b>  | <b>0,0%</b> |

## Template 5 Economic activities not eligible according to the taxonomy

| Economic activities                                                                                                                                                                                                                                    | Amount and proportion (information should be presented in monetary amounts and percentages) |                |                         |                |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|----------------|-------------------------|----------------|
|                                                                                                                                                                                                                                                        | Turnover                                                                                    |                | CapEx                   |                |
|                                                                                                                                                                                                                                                        | Amount                                                                                      | %              | Amount                  | %              |
| Amount and proportion of the economic activity referred to in row 1 of template 1 that is not eligible under the taxonomy pursuant to section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0,0 €                                                                                       | 0,0 %          | 0,0 €                   | 0,0 %          |
| Amount and proportion of the economic activity referred to in row 1 of template 1 that is not eligible under the taxonomy pursuant to section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0,0 €                                                                                       | 0,0 %          | 0,0 €                   | 0,0 %          |
| Amount and proportion of the economic activity referred to in row 1 of template 1 that is not eligible under the taxonomy pursuant to section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 432.303 €                                                                                   | 0,0 %          | 0,0 €                   | 0,0 %          |
| Amount and proportion of the economic activity referred to in row 1 of template 1 that is not eligible under the taxonomy pursuant to section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0,0 €                                                                                       | 0,0 %          | 0,0 €                   | 0,0 %          |
| Amount and proportion of the economic activity referred to in row 1 of template 1 that is not eligible under the taxonomy pursuant to section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0,0 €                                                                                       | 0,0 %          | 0,0 €                   | 0,0 %          |
| Amount and proportion of the economic activity referred to in row 1 of template 1 that is not eligible under the taxonomy pursuant to section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0,0 €                                                                                       | 0,0 %          | 0,0 €                   | 0,0 %          |
| <b>Amount and proportion of other economic activities not eligible according to the taxonomy not mentioned in rows 1 to 6 above in the denominator of the applicable ICR</b>                                                                           | <b>789.995.229 €</b>                                                                        | <b>100,0 %</b> | <b>780.442.366,33 €</b> | <b>100,0 %</b> |
| <b>Amount and proportion of ineligible economic activities according to the taxonomy in the denominator of the applicable ICR</b>                                                                                                                      | <b>790.427.532 €</b>                                                                        | <b>100,0 %</b> | <b>780.442.366 €</b>    | <b>100,0 %</b> |

## Taxonomy of Investments 2024

**Template: Ratio of investments of insurance or reinsurance companies directed to the financing of activities that which comply with the taxonomy or are linked to these activities in relation to total investments**

|                                                                                                                                                                                                                                                                                                                                           |        |                                                                                                                                                                                                                                                        |               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| The weighted average value of all investments by insurance or reinsurance companies aimed at financing economic activities that conform to the taxonomy or are linked to these activities, in relation to the value of total assets covered by the key performance indicator, with the following weightings for investments in companies: |        | The weighted average value of all investments by insurance or reinsurance companies aimed at financing economic activities that conform to the taxonomy or are linked to these activities, with the following weightings for investments in companies: |               |
| Based on turnover:%                                                                                                                                                                                                                                                                                                                       | 3,5%   | Based on turnover: [monetary value]                                                                                                                                                                                                                    | 30.452.080 €  |
| Based on investments in fixed assets:%                                                                                                                                                                                                                                                                                                    | 5,0%   | Based on investments in fixed assets: [monetary value]                                                                                                                                                                                                 | 44.260.729 €  |
| The percentage of assets covered by the key performance indicator in relation to the total investments of insurance or reinsurance companies (total assets under management). Excluding investments in sovereign entities.                                                                                                                |        | The monetary value of the assets covered by the key performance indicator. Except for investments in sovereign entities.                                                                                                                               |               |
| Coverage ratio:%                                                                                                                                                                                                                                                                                                                          | 100,0% | Coverage: [monetary amount]                                                                                                                                                                                                                            | 877.485.372 € |

**Additional and supplementary disclosures: breakdown of the denominator of the key performance indicator**

|                                                                                                                                                                                                                                                                                            |       |                                                                                                                                                                                                                                                                                                          |               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| The percentage of derivatives in relation to total assets covered by the key performance indicator. X%                                                                                                                                                                                     | 0,5%  | The monetary value of derivatives. [monetary amount]                                                                                                                                                                                                                                                     | 4.652.130 €   |
| The proportion of exposures to financial and non-financial companies not subject to Articles 19a and 29a of Directive 2013/34/EU in the total assets covered by the key performance indicator:                                                                                             |       | Value of exposures to financial and non-financial companies not subject to Articles 19a and 29a of Directive 2013/34/EU:                                                                                                                                                                                 |               |
| Non-financial companies:                                                                                                                                                                                                                                                                   | 5,7%  | Non-financial companies [monetary amount]:                                                                                                                                                                                                                                                               | 50.450.411 €  |
| Financial companies:                                                                                                                                                                                                                                                                       | 13,6% | Financial companies [monetary amount]:                                                                                                                                                                                                                                                                   | 119.762.578 € |
| The proportion of exposures to financial and non-financial companies from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU in total assets covered by the key performance indicator:                                                                           |       | Value of exposures to financial and non-financial companies from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU:                                                                                                                                                           |               |
| Non-financial companies:                                                                                                                                                                                                                                                                   | 3,7%  | Non-financial companies [monetary amount]:                                                                                                                                                                                                                                                               | 32.901.650 €  |
| Financial companies:                                                                                                                                                                                                                                                                       | 11,9% | Financial companies [monetary amount]:                                                                                                                                                                                                                                                                   | 104.409.462 € |
| The proportion of exposures to financial and non-financial companies subject to Articles 19a and 29a of Directive 2013/34/EU in total assets covered by the key performance indicator:                                                                                                     |       | Value of exposures to financial and non-financial companies subject to Articles 19a and 29a of Directive 2013/34/EU:                                                                                                                                                                                     |               |
| Non-financial companies:                                                                                                                                                                                                                                                                   | 15,8% | Non-financial companies [monetary amount]:                                                                                                                                                                                                                                                               | 138.274.417 € |
| Financial companies:                                                                                                                                                                                                                                                                       | 23,8% | Financial companies [monetary amount]:                                                                                                                                                                                                                                                                   | 208.981.315 € |
| The proportion of exposures to other counterparties and assets in the total assets covered by the key performance indicator: X%                                                                                                                                                            | 40,5% | Value of exposures to other counterparties and assets: [monetary amount]                                                                                                                                                                                                                                 | 355.358.341 € |
| The proportion of investments by insurance or reinsurance companies, other than investments related to life insurance contracts whereby the investment risk is borne by the policyholders, that are used to finance activities that fit the taxonomy or are linked to these activities: X% | 99,9% | Value of investments of insurance or reinsurance companies other than investments related to life insurance contracts under which the investment risk is borne by the policyholders, which are intended to finance activities that fit the taxonomy or are linked to these activities: [monetary amount] | 877.485.203 € |
| The value of all investments that finance economic activities that are not eligible according to the taxonomy in relation to the value of total assets covered by the key performance indicator:                                                                                           |       | Value of all investments that finance economic activities that are not eligible according to the taxonomy:                                                                                                                                                                                               |               |
| Based on turnover:%                                                                                                                                                                                                                                                                        | 87,1% | Based on turnover: [monetary value]                                                                                                                                                                                                                                                                      | 763.986.361 € |
| Based on investments in fixed assets:%                                                                                                                                                                                                                                                     | 86,7% | Based on investments in fixed assets: [monetary value]                                                                                                                                                                                                                                                   | 760.351.017 € |
| The value of all investments that finance eligible economic activities according to the taxonomy, but which do not conform to the taxonomy, in relation to the value of total assets covered by the key performance indicator:                                                             |       | Value of all investments that finance eligible economic activities according to the taxonomy, but that do not fit the taxonomy:                                                                                                                                                                          |               |
| Based on turnover:%                                                                                                                                                                                                                                                                        | 9,5%  | Based on turnover: [monetary value]                                                                                                                                                                                                                                                                      | 83.046.762 €  |
| Based on investments in fixed assets:%                                                                                                                                                                                                                                                     | 8,3%  | Based on investments in fixed assets: [monetary value]                                                                                                                                                                                                                                                   | 72.873.457 €  |

**Additional and supplementary disclosures: Breakdown of the numerator of the key performance indicator**

|                                                                                                                                                                                                                                                                                             |      |                                                                                                                                                                                                                                                                                        |              |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|
| The proportion of exposures that conform to the taxonomy versus financial and non-financial companies subject to Article 19 and 29a in the total assets covered by the key performance indicator:                                                                                           |      | Value of exposures that conform to the taxonomy vis-à-vis financial and non-financial companies subject to Article 19a and 29a:                                                                                                                                                        |              |
| Non-financial companies                                                                                                                                                                                                                                                                     |      | Non-financial companies                                                                                                                                                                                                                                                                |              |
| Based on turnover:%                                                                                                                                                                                                                                                                         | 2,7% | Based on turnover: [monetary value]                                                                                                                                                                                                                                                    | 24.094.172 € |
| Based on investments in fixed assets:%                                                                                                                                                                                                                                                      | 4,4% | Based on investments in fixed assets: [monetary value]                                                                                                                                                                                                                                 | 38.611.064 € |
| Financial companies:                                                                                                                                                                                                                                                                        |      | Financial companies:                                                                                                                                                                                                                                                                   |              |
| Based on turnover:%                                                                                                                                                                                                                                                                         | 0,7% | Based on turnover: [monetary value]                                                                                                                                                                                                                                                    | 6.357.908 €  |
| Based on investments in fixed assets:%                                                                                                                                                                                                                                                      | 0,6% | Based on investments in fixed assets: [monetary value]                                                                                                                                                                                                                                 | 5.571.912 €  |
| The proportion of investments by insurance or reinsurance companies, other than investments related to life insurance contracts under which the investment risk is borne by the policyholders, that are used to finance activities that fit the taxonomy or are linked to these activities: |      | Value of investments of insurance or reinsurance companies other than investments related to life insurance contracts under which the investment risk is borne by the policyholders, which are intended to finance activities that fit the taxonomy or are linked to these activities: |              |
| Based on turnover:%                                                                                                                                                                                                                                                                         | 3,5% | Based on turnover: [monetary value]                                                                                                                                                                                                                                                    | 30.452.080 € |
| Based on investments in fixed assets:%                                                                                                                                                                                                                                                      | 5,0% | Based on investments in fixed assets: [monetary value]                                                                                                                                                                                                                                 | 44.260.729 € |
| The proportion of taxonomy compliant exposures to other counterparties and assets in the total assets covered by the key performance indicator:                                                                                                                                             |      | Value of taxonomy compliant exposures to other counterparties and assets in relation to the total assets covered by the key performance indicator                                                                                                                                      |              |
| Based on turnover:%                                                                                                                                                                                                                                                                         | 0,0% | Based on turnover: [monetary value]                                                                                                                                                                                                                                                    | 0 €          |
| Based on investments in fixed assets:%                                                                                                                                                                                                                                                      | 0,0% | Based on investments in fixed assets: [monetary value]                                                                                                                                                                                                                                 | 77.753 €     |

**Breakdown of the numerator of the key performance indicator by environmental objective**

|                                                                                                                                      |                        |      |                                    |      |
|--------------------------------------------------------------------------------------------------------------------------------------|------------------------|------|------------------------------------|------|
| Activities that fit the taxonomy, provided that the assessment of social guarantees and the absence of significant harm is positive: |                        |      |                                    |      |
| 1) Climate change mitigation                                                                                                         | In terms of turnover:% | 0,0% | Transition activities:% (turnover) | 0,0% |
|                                                                                                                                      |                        |      | Transition activities:% (CapEx)    | 0,0% |
|                                                                                                                                      | CapEx:%                | 0,0% | Enabling activities:% (turnover)   | 0,0% |
|                                                                                                                                      |                        |      | Enabling activities:% (CapEx)      | 0,0% |
| 2) Adaptation to climate change                                                                                                      | In terms of turnover:% | 0,0% | Enabling activities:% (turnover)   | 0,0% |
|                                                                                                                                      | CapEx:%                | 0,0% | Enabling activities:% (CapEx)      | 0,0% |
| 3) Sustainable use and protection of water and marine resources                                                                      | In terms of turnover:% | 0,0% | Enabling activities:% (turnover)   | 0,0% |
|                                                                                                                                      | CapEx:%                | 0,0% | Enabling activities:% (CapEx)      | 0,0% |
| 4) Transition towards a circular economy                                                                                             | In terms of turnover:% | 0,0% | Enabling activities:% (turnover)   | 0,0% |
|                                                                                                                                      | CapEx:%                | 0,0% | Enabling activities:% (CapEx)      | 0,0% |
| 5) Pollution prevention and control                                                                                                  | In terms of turnover:% | 0,0% | Enabling activities:% (turnover)   | 0,0% |
|                                                                                                                                      | CapEx:%                | 0,0% | Enabling activities:% (CapEx)      | 0,0% |
| 6) Protection and recovery of biodiversity and ecosystems                                                                            | In terms of turnover:% | 0,0% | Enabling activities:% (turnover)   | 0,0% |
|                                                                                                                                      | CapEx:%                | 0,0% | Enabling activities:% (CapEx)      | 0,0% |

**ANNEX XII**

## Template 1: Activities related to nuclear energy and fossil gas

| <b>Activities related to nuclear energy</b>                                                                                                                                                                                                                                                                                         |     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|
| The company carries out, finances or has exposure to the research, development, demonstration and implementation of innovative electricity generation facilities that produce power from nuclear processes with minimal fuel cycle waste.                                                                                           | NO  |
| The company undertakes, finances or has exposure to the construction and safe operation of new nuclear facilities to produce electricity or process heat, including for district heating purposes or industrial processes such as hydrogen production, as well as their safety improvements, using the best available technologies. | NO  |
| The company operates, finances, or has exposure to the safe operation of existing nuclear facilities that produce electricity or process heat, including for district heating purposes or industrial processes such as the production of hydrogen from nuclear power, as well as their safety improvements.                         | YES |
| <b>Activities related to fossil gas</b>                                                                                                                                                                                                                                                                                             |     |
| The company carries out, finances or has exposure to the construction or operation of electricity generation facilities that produce electricity from gaseous fossil fuels.                                                                                                                                                         | YES |
| The company carries out, finances or has exposure to the construction, renovation and operation of combined heat/cooling and electricity generation facilities that use gaseous fossil fuels.                                                                                                                                       | YES |
| The company carries out, finances or has exposure to the construction, renovation and operation of heat generation facilities that produce heat/cold from gaseous fossil fuels.                                                                                                                                                     | NO  |

**Template 2: Taxonomy compliant economic activities (denominator)**

| Economic activities                                                                                                                                                                               | Amount and proportion (information must be presented in monetary amounts and percentages) |                      |              |             |                                 |                      |               |               |                                 |            |              |           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|----------------------|--------------|-------------|---------------------------------|----------------------|---------------|---------------|---------------------------------|------------|--------------|-----------|
|                                                                                                                                                                                                   | CCM + CCA                                                                                 |                      |              |             | Climate change mitigation (CCM) |                      |               |               | Climate Change Adaptation (CCA) |            |              |           |
|                                                                                                                                                                                                   | Turnover                                                                                  | Capex                | Turnover (%) | Capex (%)   | Turnover                        | Capex                | Turnover (%)  | Capex (%)     | Turnover                        | Capex      | Turnover (%) | Capex (%) |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0 €                                                                                       | 0 €                  | 0%           | 0%          | 0 €                             | 0 €                  | 0%            | 0%            | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0 €                                                                                       | 0 €                  | 0%           | 0%          | 0 €                             | 0 €                  | 0%            | 0%            | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0 €                                                                                       | 0 €                  | 0%           | 0%          | 0 €                             | 0 €                  | 0%            | 0%            | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0 €                                                                                       | 0 €                  | 0%           | 0%          | 0 €                             | 0 €                  | 0%            | 0%            | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0 €                                                                                       | 0 €                  | 0%           | 0%          | 0 €                             | 0 €                  | 0%            | 0%            | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0 €                                                                                       | 0 €                  | 0%           | 0%          | 0 €                             | 0 €                  | 0%            | 0%            | 0 €                             | 0 €        | 0%           | 0%        |
| <b>Amount and proportion of other economic activities that fit the taxonomy not mentioned in rows 1 to 6 in the denominator of the applicable ICR</b>                                             | <b>877.485.372 €</b>                                                                      | <b>877.485.372 €</b> | <b>100%</b>  | <b>100%</b> | <b>877.485.372 €</b>            | <b>877.485.372 €</b> | <b>100,0%</b> | <b>100,0%</b> | <b>0 €</b>                      | <b>0 €</b> | <b>0%</b>    | <b>0%</b> |
| <b>Total applicable ICR</b>                                                                                                                                                                       | <b>877.485.372 €</b>                                                                      | <b>877.485.372 €</b> | <b>100%</b>  | <b>100%</b> | <b>877.485.372 €</b>            | <b>877.485.372 €</b> | <b>100,0%</b> | <b>100,0%</b> | <b>0 €</b>                      | <b>0 €</b> | <b>0%</b>    | <b>0%</b> |

**Template 3 Taxonomy compliant economic activities (numerator)**

| Economic activities                                                                                                                                                                             | Amount and proportion (information must be presented in monetary amounts and percentages) |                     |              |             |                                 |                     |              |             |                                 |            |              |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|---------------------|--------------|-------------|---------------------------------|---------------------|--------------|-------------|---------------------------------|------------|--------------|-----------|
|                                                                                                                                                                                                 | CCM + CCA                                                                                 |                     |              |             | Climate change mitigation (CCM) |                     |              |             | Climate Change Adaptation (CCA) |            |              |           |
|                                                                                                                                                                                                 | Turnover                                                                                  | Capex               | Turnover (%) | Capex (%)   | Turnover                        | Capex               | Turnover (%) | Capex (%)   | Turnover                        | Capex      | Turnover (%) | Capex (%) |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable ICR | 0 €                                                                                       | 0 €                 | 0%           | 0%          | 0 €                             | 0 €                 | 0%           | 0%          | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable ICR | 0 €                                                                                       | 0 €                 | 0%           | 0%          | 0 €                             | 0 €                 | 0%           | 0%          | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable ICR | 0 €                                                                                       | 0 €                 | 0%           | 0%          | 0 €                             | 0 €                 | 0%           | 0%          | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable ICR | 0 €                                                                                       | 0 €                 | 0%           | 0%          | 0 €                             | 0 €                 | 0%           | 0%          | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable ICR | 0 €                                                                                       | 0 €                 | 0%           | 0%          | 0 €                             | 0 €                 | 0%           | 0%          | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of economic activity that fits the taxonomy referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable ICR | 0 €                                                                                       | 0 €                 | 0%           | 0%          | 0 €                             | 0 €                 | 0%           | 0%          | 0 €                             | 0 €        | 0%           | 0%        |
| <b>Amount and proportion of other economic activities that fit the taxonomy not mentioned in rows 1 to 6 in the numerator of the applicable ICR</b>                                             | <b>30.452.080 €</b>                                                                       | <b>44.260.729 €</b> | <b>100%</b>  | <b>100%</b> | <b>30.452.080 €</b>             | <b>44.260.729 €</b> | <b>100%</b>  | <b>100%</b> | <b>0 €</b>                      | <b>0 €</b> | <b>0%</b>    | <b>0%</b> |
| <b>Total amount and proportion of economic activities that fit the taxonomy in the numerator of the applicable ICR</b>                                                                          | <b>30.452.080 €</b>                                                                       | <b>44.260.729 €</b> | <b>100%</b>  | <b>100%</b> | <b>30.452.080 €</b>             | <b>44.260.729 €</b> | <b>100%</b>  | <b>100%</b> | <b>0 €</b>                      | <b>0 €</b> | <b>0%</b>    | <b>0%</b> |

**Template 4: Economic activities eligible according to the taxonomy but which do not comply with it**

| Economic activities                                                                                                                                                                                                                              | Amount and proportion (information must be presented in monetary amounts and percentages) |                     |              |             |                                 |                     |              |             |                                 |            |              |           |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|---------------------|--------------|-------------|---------------------------------|---------------------|--------------|-------------|---------------------------------|------------|--------------|-----------|
|                                                                                                                                                                                                                                                  | CCM + CCA                                                                                 |                     |              |             | Climate change mitigation (CCM) |                     |              |             | Climate Change Adaptation (CCA) |            |              |           |
|                                                                                                                                                                                                                                                  | Turnover                                                                                  | Capex               | Turnover (%) | Capex (%)   | Turnover                        | Capex               | Turnover (%) | Capex (%)   | Turnover                        | Capex      | Turnover (%) | Capex (%) |
| Amount and proportion of eligible economic activity according to the taxonomy but not conforming to the taxonomy referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0 €                                                                                       | 0 €                 | 0%           | 0%          | 0 €                             | 0 €                 | 0%           | 0%          | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of eligible economic activity according to the taxonomy but not conforming to the taxonomy referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0 €                                                                                       | 0 €                 | 0%           | 0%          | 0 €                             | 0 €                 | 0%           | 0%          | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of eligible economic activity according to the taxonomy but not conforming to the taxonomy referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 9.308 €                                                                                   | 0 €                 | 0%           | 0%          | 9.308 €                         | 0 €                 | 0%           | 0%          | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of eligible economic activity according to the taxonomy but not conforming to the taxonomy referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 116.608 €                                                                                 | 23.043 €            | 0%           | 0%          | 116.608 €                       | 23.043 €            | 0%           | 0%          | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of eligible economic activity according to the taxonomy but not conforming to the taxonomy referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 32.260 €                                                                                  | 4.290 €             | 0%           | 0%          | 32.260 €                        | 4.290 €             | 0%           | 0%          | 0 €                             | 0 €        | 0%           | 0%        |
| Amount and proportion of eligible economic activity according to the taxonomy but not conforming to the taxonomy referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0 €                                                                                       | 0 €                 | 0%           | 0%          | 0 €                             | 0 €                 | 0%           | 0%          | 0 €                             | 0 €        | 0%           | 0%        |
| <b>Amount and proportion of other eligible economic activities according to the taxonomy but not conforming to the taxonomy not mentioned in rows 1 to 6 above in the denominator of the applicable ICR</b>                                      | <b>82.888.586 €</b>                                                                       | <b>72.846.124 €</b> | <b>100%</b>  | <b>100%</b> | <b>82.888.586 €</b>             | <b>72.846.124 €</b> | <b>100%</b>  | <b>100%</b> | <b>0 €</b>                      | <b>0 €</b> | <b>0%</b>    | <b>0%</b> |
| <b>Amount and proportion of eligible economic activities according to the taxonomy but not conforming to the taxonomy in the denominator of the applicable ICR</b>                                                                               | <b>83.046.762 €</b>                                                                       | <b>72.873.457 €</b> | <b>100%</b>  | <b>100%</b> | <b>83.046.762 €</b>             | <b>72.873.457 €</b> | <b>100%</b>  | <b>100%</b> | <b>0 €</b>                      | <b>0 €</b> | <b>0%</b>    | <b>0%</b> |

**Template 5 Economic activities not eligible under the taxonomy**

| <b>Economic activities</b>                                                                                                                                                                                                                             | <b>Amount and proportion (information must be presented in monetary amounts and percentages)</b> |               |                      |             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|---------------|----------------------|-------------|
|                                                                                                                                                                                                                                                        | <b>Turnover</b>                                                                                  |               | <b>CapEx</b>         |             |
|                                                                                                                                                                                                                                                        | <b>Amount</b>                                                                                    | <b>%</b>      | <b>Amount</b>        | <b>%</b>    |
| Amount and proportion of the economic activity referred to in row 1 of template 1 that is not eligible under the taxonomy pursuant to section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0 €                                                                                              | 0%            | 0 €                  | 0%          |
| Amount and proportion of the economic activity referred to in row 1 of template 1 that is not eligible under the taxonomy pursuant to section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0 €                                                                                              | 0%            | 0 €                  | 0%          |
| Amount and proportion of the economic activity referred to in row 1 of template 1 that is not eligible under the taxonomy pursuant to section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 101.840 €                                                                                        | 0%            | 0 €                  | 0%          |
| Amount and proportion of the economic activity referred to in row 1 of template 1 that is not eligible under the taxonomy pursuant to section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0 €                                                                                              | 0%            | 0,00                 | 0%          |
| Amount and proportion of the economic activity referred to in row 1 of template 1 that is not eligible under the taxonomy pursuant to section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0 €                                                                                              | 0%            | 0,00                 | 0%          |
| Amount and proportion of the economic activity referred to in row 1 of template 1 that is not eligible under the taxonomy pursuant to section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable ICR | 0 €                                                                                              | 0%            | 0,00                 | 0%          |
| <b>Amount and proportion of other economic activities not eligible according to the taxonomy not mentioned in rows 1 to 6 above in the denominator of the applicable ICR</b>                                                                           | <b>0 €</b>                                                                                       | <b>0%</b>     | <b>760.351.017 €</b> | <b>100%</b> |
| <b>Amount and proportion of ineligible economic activities according to the taxonomy in the denominator of the applicable ICR</b>                                                                                                                      | <b>763.986.361 €</b>                                                                             | <b>100,0%</b> | <b>760.351.017 €</b> | <b>100%</b> |

## Climate Change (ESRS E1)

### Governance

#### **GOV-3: Integration of sustainability-related performance into incentive systems.**

In 2025, the Línea Directa Group continued to incorporate climate change considerations into the variable remuneration systems for various groups within the Group, including the CEO, the Management Committee, identified non-managerial staff, and corporate personnel. These considerations are aligned with the climate goals defined in the Group's 2023-2025 Sustainability Plan and reported below, in accordance with the disclosure requirement under sub-section E1-4, Targets related to climate change mitigation and adaptation, ensuring consistency between environmental management goals and variable remuneration.

#### **Integration of climate goals into variable remuneration.**

During the year, the Group's corporate areas, with a quarterly variable system, included a specific climate-related objective in the third quarter, taken from the Sustainability Plan:

- **Launch of a product/service/coverage related to sustainability** in any of the branches of activity.

Additionally, the corporate risk area has specifically included an additional target in the third quarter:

- Perform testing related to **the energy efficiency of technology processes/developments and testing related to the accessibility of web applications** (new developments and evolutions) managed by transformation.

#### **Indicators in annual variable remuneration.**

A variable remuneration target has been established for the CEO and the Management Committee, linked to the preparation and publication of the Task Force on Climate-related Financial Disclosures (TCFD) report. This target is consistent with the emissions reduction targets reported in sub-section E1-4, Targets related to climate change mitigation and adaptation, and forms part of the 2025 Sustainability Plan.

#### **Long-term variable remuneration (2023-2025)**

The long-term incentive program (ILP), applicable to the CEO, Management and select middle managers, includes the following environmental goals:

- 1 Reduction of energy consumption of electricity, natural gas and diesel in 2025 compared to 2022.
- 2 Preparing and publishing TCFD reports, adapted to the recommendations in force as of December 31, 2025. The reports contain information from the previous year.

These goals are designed to promote the transition towards sustainability and ensure compliance with the Group's climate commitments.

### **Percentage of remuneration tied to climate goals.**

The average percentage of variable remuneration linked to climate during the period is 1.22%. This value is a weighted average of the percentages allocated to climate goals within the variable remuneration of the groups that include them, and the specific details for each group are documented in internal records.

### **Consistency with the goals reported in subchapter E1-4 Goals related to climate change mitigation and adaptation.**

The climate goals included in variable remuneration are aligned with the Group's strategic commitments, which include:

- 1 The commitment to achieve carbon neutrality by 2030 and Net Zero by 2050, in collaboration with the SBTi initiative (This commitment has been cancelled by the Sustainability Committee given the European legal uncertainty and the delay in regulatory approval). In 2026, the development of the Decarbonisation Plan, in accordance with Royal Decree 214/2025, was included in the Sustainability Plan, based on the science-based methodology of said initiative.
- 2 Minimum reduction of 15% in energy consumption by 2025 compared to 2022. With an achievement of 29% by the end of 2025.
- 3 Preparation of a climate transition plan based on the EFRAG guidelines. This commitment has been cancelled by the Sustainability Committee due to European legal uncertainty and delays in regulatory approval.
- 4 Adaptation to the TCFD requirements in force by December 31, 2025, and publication. The latest published report includes climate performance data from 2024.

## **Strategy**

### **SBM-3. Impacts, risks and opportunities of relative importance and their interaction with the strategy and business model.**

#### **Climate risk identification.**

Línea Directa has identified a material risk related to climate change within the Climate Change Adaptation Sub-topic, which is part of the broader Climate Change Mitigation and Adaptation topic across the business. This risk, classified as a physical risk, is related to the increase in the severity, frequency, and duration of extreme weather events, which has already had a significant impacts on the Company's income statement, particularly in the Home insurance segment.

The increase in these events has negative effects in various areas, such as increased frequency and cost of claims, higher operating costs due to increased call volumes, and an impacts on service quality. Additionally, an increase in reinsurance rates is expected, as international reinsurers pass on losses related to these events to premiums, even in less affected markets like Spain. In the long term, some reinsurers could face default due to their exposure to sectors with a high probability of default during the transition to a low-carbon economy.

In addition to this material risk, the Group has identified other climate-related risks, classified as transition risks, which, although not material, are integrated into the risk management and monitoring system.

These include risks associated with new sustainability regulations, a lack of environmental information for assessing coverage, increased capital requirements, impacts on fossil fuel vehicle sales, and regulatory constraints related to climate change.

### **Resilience analysis.**

Línea Directa 's climate change resilience strategy aims to integrate environmental, social, and governance (ESG) factors into its corporate and business strategy to advance towards a sustainable, low-carbon economy. This resilience analysis encompasses both adapting to climate risks and leveraging opportunities associated with the energy transition.

The analysis considers two key strategies:

1. Enhancing resilience to climate change impacts by implementing an underwriting policy that accounts for the rise in extreme weather events and a tailored reinsurance program to mitigate natural catastrophe risks.
2. Advancing toward a decarbonised economy by capitalising on business opportunities related to electric mobility, the circular economy, and the targets of achieving carbon neutrality by 2030 and Net Zero by 2050.

The analysis encompasses both the Group's own operations and the most significant risks within its value chain, adopting a holistic approach that addresses both physical and transition risks.

### **Results of the resilience analysis.**

Línea Directa has conducted a **climate scenario** analysis aligned with the TCFD recommendations, assessing short-, medium-, and long-term climate risks. This analysis includes assumptions related to **macroeconomic trends**, changes in **energy consumption**, and **technological advancements** that may influence its business model. The anticipated financial effects of physical and transition risks have also been evaluated, identifying their impacts on underwriting, claims, and capital regulated under **Solvency II**. To this end, Línea Directa considered various scenarios, representative of the identified and defined risks, to assess these risks from the perspective of underwriting, reinsurance, and financial investment. These scenarios, developed in detail in the **Línea Directa 's TCFD Report**, include, among others, the risk of a portfolio decline due to lower sales of fossil fuel cars and the ban on vehicles circulating in cities, or the increase in claims and operating costs due to the increased frequency and severity of the physical impacts of adverse weather events that would inevitably lead to an increase in claims costs.

The analysis has identified the Group's capacity to adapt to climate challenges, highlighting its flexibility in adjusting its strategy and incorporating mitigation measures. Examples of these actions include increasing its market share in electric vehicles, developing new products and services tailored to customer needs in the face of climate change impacts, and **reducing energy consumption by 29% from 2022 to 2025**. Furthermore, the **sustainability training provided to 88% of its workforce** reinforces its commitment to the transition to a more sustainable business model.

The resilience analysis also highlights Línea Directa 's ability to integrate the findings of this process into strategic decisions and investments, ensuring the long-term sustainability of the business and strengthening its position in an evolving economic and regulatory landscape.

## Impacts, risk and opportunity management

### **IRO-1. Description of the processes for determining and assessing the impacts, risks and opportunities of relative importance related to climate change.**

As detailed in chapter ESRS 2 IRO-1 Management of impacts, the Línea Directa Group, through consultation with the Sustainability Working Group and subsequent submission of the findings to the Sustainability Committee for approval, updated its Double Materiality exercise in 2025. This update enabled the identification and reassessment of Impacts, Risks, and Opportunities (IROs) related to climate change, considering both impacts materiality (inside-out) and financial materiality (outside-in). This approach allows the Group to address both the effects of its operations and strategy on the climate and the risks and opportunities that climate change presents. This analysis encompasses all internal operations, the value chain, and interactions with Stakeholders, including employees, customers, suppliers, and shareholders.

The Double Materiality process is based on a structured methodology that includes an analysis of the internal and external context, the preliminary identification of relevant issues, the assessment of material impacts, risks, and opportunities, and their prioritization according to their relevance. In the context of climate change, this methodology has been complemented by a specific analysis of risks and opportunities, detailed in the TCFD Climate Report, to ensure a comprehensive approach aligned with international best practices.

### **Climate-related Impacts, Risks and Opportunities**

The Group has conducted a comprehensive analysis to identify and assess its greenhouse gas (GHG) emissions, following standards such as the GHG Protocol and considering both current and future sources of actual and potential emissions. This analysis includes an assessment of emissions associated with Scopes 1, 2, and 3, and is based on projections related to changes in the business model, such as the transition to electric and hybrid vehicles, and the potential impacts of new regulations. The results of this analysis are disclosed annually as part of the sustainability reports, integrating projections and strategies to mitigate these emissions.

**Physical risks** have also been identified, including **extreme weather events** such as storms and torrential rains, and changes in precipitation **patterns**. These phenomena have significantly impacted claims in the home insurance line, with increasing effects on the income statement. The Group has assessed the exposure of its assets and operations to these risks using high-emission climate scenarios, such as the IPCC's SSP5-8.5, and considering short-, medium-, and long-term time horizons.

Furthermore, the potential consequences of more severe extreme events have been analyzed, such as the increased likelihood of default by reinsurers, given their exposure to sectors vulnerable to climate change. These analyses have allowed Línea Directa to project the operational and financial costs associated with these risks and develop mitigation strategies, including specific reinsurance programs.

In the area of **transition risks**, Línea Directa has identified several key factors, such as the increase in regulatory capital requirements due to the integration of climate risks into Solvency II calculations, the impacts of new environmental regulations, and market dynamics associated

with the electrification of the vehicle fleet. The Group has assessed these risks using climate scenarios aligned with the **Paris Agreement**, which project **global warming limited to 1.5°C**.

On the other hand, Línea Directa has also identified significant opportunities, such as growth in the electric vehicle market share and the incorporation of personal mobility solutions into its product offering. These opportunities have been evaluated considering long-term time horizons and their alignment with long-term decarbonisation strategies.

### **Climate scenario analysis and resilience.**

Climate scenario analysis has been a fundamental tool for developing climate risk and opportunity assessments. For **physical risks**, Línea Directa has used the following **shared socioeconomic pathways** (SSPs) defined by the IPCC, highlighting:

- A scenario below 2°C, **SSP1-2.6**, describes a world in which global CO<sub>2</sub> emissions are drastically reduced, reaching net zero after 2050.
- A scenario that reflects the greatest stress for physical risks, **SSP5-8.5**, in which current CO<sub>2</sub> emission levels will approximately double by 2050 and by 2100 the average global temperature will have risen by 4.4 degrees.

For transition risks, three scenarios defined by NGFS have been used to identify different climate variables:

- The **orderly** scenario, in which governments and companies adopt early measures and policies to achieve net zero CO<sub>2</sub> emissions and a temperature increase of less than 2°C by 2070.
- The **disorderly** scenario, where measures are adopted late and therefore investments must be greater to achieve emissions targets.
- The **Hot House World** scenario, where no additional measures are taken beyond those already in place, leads to a high temperature increase.

These analyses have allowed the Group to project possible **short, medium and long-term** impacts, considering factors such as increased operating costs, the effect of new regulations, and changes in the dynamics of the insurance market.

The analysis process includes assessing macroeconomic forces, technological trends, and public policies, as well as evaluating the uncertainties and limitations inherent in the scenarios used. This analysis was conducted following the recommendations of the TCFD framework, updated in 2025 with 2024 data, ensuring a structured approach based on international best practices. The Group used recognized climate scenarios, such as SSP5-8.5 for physical risks and scenarios aligned with the Paris Agreement for transition risks, ensuring a rigorous assessment in accordance with TCFD guidelines on climate scenario analysis. The results of this process have been integrated into corporate strategies and published in the TCFD Climate Report, which is released at the end of each fiscal year.

Finally, Línea Directa developing the ORSA 2025-2026, including scenarios consistent with the physical and transition risks addressed in the TCFD. In this regard, the starting point for the calculation has been the time horizons considered in the TCFD, which are projected to 5, 5 to 10, and more than 10 years, to adapt them to the time horizons of the ORSA methodology, which uses a 3-year period.

## E1-1. Transition plan for climate change mitigation.

Currently, the Línea Directa Group does not have a transition plan for climate change mitigation. Initially, the 2024 Sustainability Plan included, as an action, the definition and approval of a Net Zero target for 2050, which included interim reduction targets for 2030 in accordance with the Science Based Targets Initiative (SBTi). However, the vision of the 2023-2025 Plan is to guide the Group towards sustainable growth, promoting ESG dimensions from within the Group and positioning its direct model as the best asset for Stakeholders.

During 2025, and pending of the publication of European regulations in this area, the Group has postponed this action, transferring its decarbonisation strategy to the new Emissions Reduction Plan that complies with Royal Decree 214/2025, of March 18, which creates the carbon footprint register, remuneration and carbon dioxide absorption projects and establishes the obligation to calculate the carbon footprint and to prepare and publish greenhouse gas emission reduction plans.

The Group voluntarily published its 2025 report on risks and opportunities associated with climate change, in accordance with the reporting recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), a leading international initiative on environmental reporting. This document describes the Group's governance model, strategy, risk management system, metrics, and goals regarding the risks and opportunities arising from global warming, as well as the progress made by the entity in this area.

Within the 2025 Sustainability Plan, the preparation of a **Climate Change Transition Plan**, based on the EFRAG implementation guide, was proposed as an action within the environmental pillar. This plan was intended for presentation and development within the 2026-2028 Sustainability Plan, aligned with the organisation's overall strategy and financial planning. Pending European regulations on this matter, this action has been cancelled by the Sustainability Committee and the Incentives Committee.

Both the Emissions Reduction Plan and the climate report will be available on the corporate website once approved.

During 2025 the Group has worked on the development of the new Sustainability Plan 2026-2028 which, in the "Environmental Management and Decarbonisation" action line, will take into account, among others, the following factors:

- The status of the Group will be studied with respect to the EU benchmark indexes aligned with the Paris Agreement.
- The plan will be developed in such a way that progress in its implementation can be monitored.
- A qualitative assessment will be conducted of potential blocked GHG emissions from Línea Directa 's key assets and products. In addition, the interdependence of these emissions with achieving GHG emission reduction targets will be evaluated, as well as whether they could lead to transition risks.
- The investments and financing for the implementation of the Transition Plan will be presented, both qualitatively and quantitatively, aligned with the key performance indicators of the CapEx taxonomy.
- Reference will be made to GHG emissions reduction targets, in line with the Paris Agreement and taking into account SBTi, and to climate change mitigation actions, as well as the development of identified decarbonisation levers and planned key actions. Furthermore, the plan will include potential changes to the product and service portfolio

and the adoption of new technologies in its own operations, or in the upstream and/or downstream value chain.

In the absence of a defined emissions reduction trajectory in the financial sector, Línea Directa set its emissions reduction targets aligned with SBTi, combining 1.5°C and WB2C scenarios.

Throughout the year, the Sustainability Committee has cancelled the interim reduction target for 2030 and submission of the proposal to SBTi for its 2025 review, redirecting it to the development of the Decarbonisation Plan which includes that same interim target for 2030 according to the Paris Agreement for Scope 1 and 2.

## **E1-2. Policies related to climate change mitigation and adaptation.**

The general principles of action regarding climate risk management are set out in the **Environmental Management and Climate Change Policy** of the Línea Directa Group, which was approved by the Board of Directors on September 20, 2022, replacing the Environment and Energy Efficiency policy.

The objective of the Group's Environmental Management and Climate Change Policy, aligned with the Sustainability Policy, explained in more detail in subchapter S1-1 Policies related to own personnel, is to minimize the impacts that could arise from its activities, products and services, as well as adapting to the effects of climate change.

### **Scope and governance of the policy.**

The principles outlined in this policy apply to all employees, managers, and directors of all companies within the Línea Directa Group, as well as to the Línea Directa Foundation, in accordance with applicable regulations. In this context, the Group also expects its collaborators and other individuals involved in its operations, products, and services to adhere to the policy. To this end, Línea Directa makes the policy available to Stakeholders through both its intranet and corporate website.

Furthermore, the Group is committed to extending its stance on the environment and climate change by promoting awareness among employees and suppliers.

The policy is periodically reviewed by the Space Management and Planning department and its approval is the responsibility of the Board of Directors of Línea Directa Aseguradora, which is also the highest supervisory body for compliance with the policy.

### **Regulations and benchmark initiatives in policy.**

The Línea Directa Group bases its climate change actions on compliance with applicable regulations and adherence to internationally recognized best practices and standards, such as the United Nations Framework Convention on Climate Change, the 2015 Paris Agreement, the 2030 Agenda and the Sustainable Development Goals (SDGs 7, 12, and 13), the European Green Deal, the UNE-EN ISO 14001:2015 standard for Environmental Management Systems, and the UNE-EN ISO 50001:2018 standard for Energy Management Systems. Furthermore, the Línea Directa Group is a signatory to the United Nations Global Compact and a member of the Task Force on Climate-related Financial Disclosures (TCFD), actively participating in the search for practical solutions to climate change management.

## Principles, commitments and goals of the policy.

The policy pursues the following goals:

- Establish management mechanisms that allow measuring the evolution of environmental performance and help in decision-making.
- To avoid or minimize the environmental impacts that the Group's activity could generate.
- Consider and evaluate the impacts that your products and services could have on climate change and define measures to adopt for the elimination or reduction of polluting emissions.
- Promote environmentally friendly products and services and support customers in their transition to a low-carbon economy.
- To foster an environmental culture among its employees, suppliers and partners.
- Promote public awareness campaigns on environmental protection measures.
- Participate in international and national initiatives related to the environment and climate change.
- To inform Stakeholders transparently and periodically about the environmental management of the Línea Directa Group.

To this end, Línea Directa has set a range of goals related to internal environmental management that are common to the responsible consumption of materials and resources, energy saving and efficiency, climate change, integrated waste management, and investments. These common goals are:

- Comply with legal requirements and other requirements that are applicable to the activities, products and services of the Línea Directa Group.
- Establish work guidelines and control mechanisms to ensure environmental protection and pollution prevention at the facilities.
- To promote the continuous improvement of the management system and its progressive extension to the entire Línea Directa Group.
- Identify and manage the environmental risks of the Línea Directa Group for their proper elimination or mitigation.
- To positively influence the environmental behavior of Stakeholders through communication, awareness-raising, and sensitization regarding the importance of the environment, as an additional variable to business management. Specifically, environmental training for its employees is a key aspect for the Línea Directa Group.

The policy also establishes commitments for each of the aforementioned areas, such as integrating climate risk assessment into the business strategy definition, taking it into account when defining new products and services, and encompassing both specific risks caused by weather events and transition risks arising from the migration to a low-carbon economy (e.g., regulatory risks). It also includes exploring the possibility of extending the implementation of energy efficiency management systems to all its centers, basing its processes on the UNE-EN ISO 50001:2018 standard, and committing to use energy from renewable sources certified by guarantees of origin, whenever possible. Furthermore, Línea Directa commits to advancing

its analysis of the risks and opportunities arising from climate change, following the structure proposed within the TCFD framework.

In this way, Línea Directa 's environmental policy also responds to various specific issues of environmental management such as: responsible consumption of materials and resources, energy saving and efficiency, climate change, comprehensive waste management and investments.

### **E1-3. Actions and resources in relation to climate change policies.**

The Línea Directa Group, within the framework of its commitments to mitigating climate change, has established an action plan that allows it to advance progressively, which is developed through different decarbonisation levers, such as renewable energy, energy efficiency, sustainable mobility and the circular economy and the absorption of carbon emissions derived from its activity.

Within the 2023-2025 Sustainability Plan, the Group has included in its roadmap to decarbonize its activity the definition and approval of a Net Zero target by 2050 that includes intermediate reduction targets for 2030 in accordance with SBTi.

With the approval of Royal Decree 214/2025, the Sustainability Committee assessed the situation and submitted to the Board the cancellation of this action, since the emission reduction targets for 2030 and 2050 are presented in the Emission Reduction Plan included in this report.

#### **Renewable energy.**

Línea Directa Aseguradora continues to consume **100% renewable grid electricity** from sources with Guarantees of Origin, an action that the Company will continue to pursue in 2026. In addition, it operates **self-generating** photovoltaic plants at its offices and at the Group company, CAR, which operates in the Community of Madrid.

In 2025, self-generated electricity accounted for **18.7% of total consumption** at Línea Directa Aseguradora and 12.1% at CAR Madrid, **maintaining the trend from the previous year**. In 2024, self-generated electricity consumption at Línea Directa Aseguradora was 20% of total consumption for the year, and at CAR Madrid, 12% of annual consumption.

In 2025 the Company invested 57,280.27 euros plus VAT for the expansion of the photovoltaic plant of the TC3 building

In the case of CAR Madrid, the company did not incur significant expenses during the year, as it maintained the plaques installed in 2022.

Thanks to its use of renewable grid energy, the parent company, Línea Directa Aseguradora, has avoided the emission of 623.3 tons of carbon. Likewise, the self-generation of electricity from its photovoltaic plants has avoided an additional 143.3 tons. The company expects to maintain this same trend in Scope 2 emissions by 2026.

In the case of CAR Madrid, thanks to the consumption of self-generated energy, an estimated 24.64 tons of carbon have been avoided. A similar reduction is expected to be maintained through 2026 due to the continued operation of the photovoltaic plant located on its premises.

The Group's renewable grid and self-generated electricity in 2025 accounted for 71% of total electricity consumption for the year.

### Regarding energy efficiency.

Línea Directa Aseguradora, as part of its Sustainability Plan, has approved a 15% reduction in energy consumption for its parent company by 2025 compared to 2022, including natural gas, diesel, and grid electricity. At year-end, the reduction in energy consumption for 2025 compared to 2022 was 29%.

Although the 2026 Sustainability Plan does not reflect an initiative to reduce consumption, the Company is committed to maintaining the current consumption levels and continuing with its roadmap defined in the goals of the emissions reduction plan.

The parent company maintains the ISO 50001 energy efficiency certification annually, which guarantees the optimisation and compliance with energy consumption control in all its office buildings and will be continued in 2025.

Regarding improvements to air conditioning, in 2025 a new ducted system was installed in the data center of building TC1, an outdoor cassette unit was replaced, a new air conditioning unit was installed in the office of building TC1, and the cooling coil of the air conditioning unit in building TC2 was also replaced. The cost of these improvements amounted to € 25,910.98 including VAT.

During 2025, a feasibility study was conducted for the implementation of ISO 50001 requirements in the subsidiaries. Due to the **company's strong energy performance and optimized facility efficiency**, the Services and Claims Management decided to cancel this initiative and not proceed with implementation and subsequent certification under this standard. CAR Madrid holds an excellent rating in management from the Madrid Excelente seal and the Zero Waste Certificate.

For its part, CAR Barcelona is located in a high-efficiency building, which features LED lighting, high-efficiency compressors, and low-consumption paint booths.

Furthermore, CAR Barcelona and CAR Madrid will benefit from the renewal of the replacement vehicle fleet in 2026, which Línea Directa Aseguradora will carry out for its network of workshops. This renewal will prioritize models that reduce emissions and offer enhanced safety features.

### Regarding sustainable mobility.

The Línea Directa Group approved two actions to promote sustainable mobility in its 2023-2025 Sustainability Plan. The first consisted of encouraging the use of electric vehicles among employees by increasing the number of charging points available to them in the offices. In 2023, the Company had 16 charging points, which increased to 20 for employees and 3 more for external users in 2024.

In 2025, the **number of charging points (with a fee) was increased to 25, and 3 free charging points were added**, in line with the projected progression outlined in the Plan. This expansion of the number of chargers represented an investment of € 16,900 plus VAT in 2025. These measures facilitate the use of plug-in vehicles for commuting to the offices by both employees and non-employees.

On the other hand, Línea Directa Aseguradora has a **Sustainable Mobility Guide** that directs its employees to offer more sustainable alternatives and is available on the Company's intranet.

With these initiatives, Línea Directa has managed to keep the carbon footprint of its employees' commuting activities in 2025 at levels close to those of 2024. In 2025, employee **in itinere commutes** resulted in the emission of up to 2,229.8 tons of carbon. In 2024, this group emitted 2,163 tons, a 3% decrease. It is worth noting the **53% increase in the number of kilometers traveled by employees using electric vehicles in 2025 compared to 2024**.

### Regarding the circular economy.

In recent years, the Línea Directa Group has developed actions that promote the circular economy, considered one of the main global challenges.

Among these actions, the project launched in 2016 to reduce paper consumption through the implementation of digital procedures stands out. Customers can access all documentation digitally with the "Digital Policy," which is sent to the insured upon purchase. In addition, other measures have been implemented to raise employee awareness about paper conservation, such as the expanded use of electronic signatures. These are now used in all documentation related to customers, as well as in contracts with suppliers and employees, allowing each contract to have a single digital file and thus reducing paper requirements.

Furthermore, the Línea Directa Group has focused on reducing waste generation and increasing the reuse, recycling, or other forms of recovery of waste produced by its vehicle repair workshops, given the nature of their activities and the types of materials they handle. The CAR workshop waste certification process has represented an investment of € 6,600.

- CAR Madrid has renewed its **"Zero Waste" certificate**, which confirms that over 95% of the waste generated by its production activities has been treated for recycling and recovery. This represents an increase of approximately 5 percentage points compared to 2024.
- CAR Barcelona has obtained the **"Towards Zero Waste" certificate**, which confirms that over 74% of the waste produced is recoverable. Waste recovery is approximately 14 percentage points higher than in 2024.

### Indicators of eco-efficiency and sustainable use.

To support employees in this transformation, the Company has planned, as an action within the environmental axis of the 2026 Sustainability Plan, an awareness campaign on sustainable driving.

Furthermore, pending regulatory developments on sustainable mobility, the Group will continue in subsequent years to evaluate potential measures for carpooling, promoting public transport, and improving employee mobility habits when traveling for work. These measures will form part of the Group's future Sustainable Mobility Plan.

The Group will continue to take steps to avoid and maintain a similar level of emissions in 2025, focusing on achieving the targets it has set for 2030 in the Emissions Reduction Plan.

Finally, in the Taxonomy section, the insurance Group reports the European taxonomy, publishing the eligibility and alignment in premiums of its insurance guarantees, and the eligibility and alignment of the investment portfolio, which reflects its exposure both by business volume and by CAPEX of the portfolio composition accounted for according to the standard.

## Metrics and targets

### E1-4. Targets related to climate change mitigation and adaptation.

The Línea Directa Group prioritizes environmental protection, the responsible use of resources, and combating climate change. To this end, it has developed a set of actions that define its general operating principles and are framed within its Sixth Sustainability Plan 2026-2028.

Its commitment to the environment is aimed at minimizing the direct impacts that could arise from the use of natural resources in its production activities, and the indirect impacts that could occur in its insurance and investment activities. Línea Directa Environmental Management and Climate Change Policy, aligned with its Sustainability Policy, establishes its objective of minimizing the impacts that could arise from its activities, products, and services, as well as adapting to the effects of climate change.

The Línea Directa Group bases its actions regarding climate change on compliance with applicable regulations and the monitoring of best practices or internationally recognized standards, as indicated in subchapter E1-2 Policies related to mitigation and adaptation to climate change.

#### Greenhouse Gas (GHG) emissions reduction targets

Regarding goals, Línea Directa has set a series of environmental goals, which it has committed to reviewing annually, for all its Group indicators (including its subsidiaries) in 2026.

The following explains the goals related to the Impacts, Risks and Opportunities (IROs) identified in the adaptation and mitigation to climate change section:

- Current Positive impact: Improved climate management due to the implementation of climate commitments through the corporate environmental strategy. The Group, through its Decarbonisation Plan, which is published in this report, sets interim reduction targets for 2030, in accordance with the international commitments assumed by Spain under the Paris Agreement and reflected in Royal Decree 214/2025.
- Current Positive impact: Supporting customers' adaptation to a lower-carbon economy. Línea Directa supports its customers in the transition to a low-carbon economy with its insurance product for electric and plug-in hybrid vehicles, offering specific coverage for these types of vehicles, as well as occasional discounts to promote their purchase in a segment of passenger cars that are typically more expensive than traditional vehicles. The ESG Product Design chapter details the goals set by Línea Directa to expand its range of products, services, and coverage related to sustainability, which, among other benefits, help its customers adapt to a lower-carbon economy.
- Current Positive impact: Reduction of GHG emissions levels and contribution to meeting the goals set in the Paris Agreement through the business strategy. This impact is related to Línea Directa 's annual GHG emissions reduction targets and the GHG emissions reduction targets for 2030 and 2050 that comply with Royal Decree 214/2025.
- Potential risk: Increase in the severity, frequency, and duration of extreme weather events. The Group has updated and published its 2025 TCFD report, which presents its performance data for 2024 and includes a comprehensive analysis of different climate change scenarios that may pose risks and opportunities for the Group in the short-, medium-, and long-term, taking into account physical and transition risks. This

document outlines the entity's strategy for addressing climate change and thus contributing to the decarbonisation of the economy by 2050. Furthermore, the Group has assessed the short- and medium-term impacts of climate change on its business, from an underwriting and claims perspective, in its ORSA model, within the Solvency II regulatory framework. The projection for 2024, under the standard formula of Mandatory Solvency Capital (MSC) for the universe of risks contemplated in the ORSA and after applying the scenario of increased claim cost due to adverse weather event to the base scenario, revealed an increase in the capital burden of € 2.9M of required capital.

## Decarbonisation plan.

**Royal Decree 214/2025**, concerning Carbon Footprint, Remuneration, and CO<sub>2</sub> Absorption Projects, is the main regulatory instrument in Spain for promoting the reduction of greenhouse gas emissions in the business and public sectors. This regulation establishes the obligation for certain organisations to calculate and publish their carbon footprint, as well as to define and implement emissions reduction plans, promoting transparent climate management geared towards continuous improvement.

This regulatory framework is part of the international commitments assumed by Spain after the ratification of the Paris Agreement, which sets as **a global objective to limit the increase in the average global temperature to well below 2 °C and to make efforts to not exceed 1.5 °C**, moving towards climate neutrality by 2050.

Consequently, the reduction plans required by Royal Decree 214/2025 must be aligned with a decarbonisation pathway consistent with these climate goals, ensuring that emission reductions contribute effectively to mitigating climate change.

In this context, the Línea Directa Group is **aligning its emissions reduction strategy with the principles of the Paris Agreement**, integrating the requirements of Royal Decree 214/2025 into its corporate planning and defining realistic, measurable reduction targets compatible with a 1.5°C pathway, thus reinforcing its commitment to the transition to a low-carbon economy.

The Línea Directa Group has approved a decarbonisation plan aligned with the Paris Agreement, which **establishes a 42% reduction in absolute Scope 1+2 emissions by 2030**.

The scope of the Plan affects the entire Group: Línea Directa Aseguradora, CAR, Línea Directa Asistencia and LDActivos S.L.U.. Likewise, Scope 1 and 2 are treated jointly and are the result of the calculation under the Greenhouse Gas Protocol methodology.

The year 2022 has been selected as the base year, as it corresponds to the year prior to the last three-year Sustainability Plan implemented.

In this regard, the 2023-2025 Plan has implemented numerous measures to reduce energy consumption and boost photovoltaic energy production. Choosing 2022 as the baseline year allows for a consistent evaluation and comparison of the effectiveness of the energy efficiency and renewable energy procurement measures implemented by the company in the last Plan and in the upcoming ones.

As of the close of fiscal year 2025, and using 2022 as the baseline year, the Línea Directa Group has reduced its Scope 1+2 emissions by 7.04%. In the coming years, up to 2030, the Group will address the reduction of its emissions by 34.95% to reach the intermediate target

set by the Paris Agreement, in order to make adequate progress towards the final goal of Net Zero 2050.

### **Projections to 2030**

To project emissions to 2030 (without using any decarbonisation measures) and establish a conservative assumption, the surface area (m<sup>2</sup>) of the Group's facilities, directly linked to the Group's energy demand, has been used as a reference variable. In this respect, the Group's digital and direct model, without a network of physical offices, makes its growth more efficient. Its emissions are linked to the energy consumption in the offices from which all operations are centralized.

For this reason, a projection to 2030 of stable consumption in the coming years can be assumed for Scope 1 + 2 emission sources.

In 2022, the baseline year chosen for the Decarbonisation Plan, 897.20 tons of CO<sub>2</sub> were emitted from Scope 1 and Scope 2 emissions combined. The 42% reduction target aims to reach 520.38 tons in the coming years. The fifth Sustainability Plan 2023-2025 concludes in 2025 with carbon emissions of 833.98 tons, a 7.05% reduction.

To achieve the objective, the Group has set a reduction path to reach 464.8 tons in 2030, a 48.19% reduction compared to 2022.

The Línea Directa Group's Decarbonisation Plan slightly exceeds the target committed to under the Paris Agreement, which will allow it to address possible eventual phenomena that occur outside the company's control and that could cause an increase in emissions.

### **Decarbonisation levers**

The two decarbonisation levers that will allow the reduction targets proposed above to be achieved are presented below:

#### **Lever 1: Replacement of 20% diesel with HVO Biodiesel.**

This measure involves replacing the diesel fuel used in the generator sets of the Línea Directa Group with HVO biodiesel. This measure would allow for a slight reduction of 7.62 tCO<sub>2</sub> e in Scope 1 emissions from 2026 to 2030. Although its impacts is limited, this lever would provide some reduction compared to the Scope 2 measure.

#### **Lever 2: Purchase of Guarantees of Origin for 100% of electricity consumption by 2030.**

By 2025, the Company has consolidated an energy model based on 100% renewable grid electricity and self-generation for its headquarters offices. In this regard, the proposed measure involves extending the purchase of Guarantees of Origin to reduce the Scope 2 carbon footprint to 0 tCO<sub>2</sub> e.

This measure would represent a 47.50% reduction by 2030 in scopes 1 and 2, and a 100% reduction in scope 2. Following this roadmap, the Línea Directa Group would reduce its carbon footprint by 426.20 tCO<sub>2</sub> e compared to the base year.

#### **Other Levers: Photovoltaic installation, energy efficiency, LED lighting and training.**

Since 2022, Línea Directa has continuously strengthened its photovoltaic generation, progressively expanding self-consumption installations at its offices and at CAR Madrid. As a result, the percentage of self-generated electricity increased from 6.1% in 2022 to 16.05% of total consumption in 2024.

In 2025, the proportion of self-generated energy reached 16.67%, primarily due to the incorporation of energy consumption from the Chamberí building, managed by LDActivos, as well as the overall reduction in energy consumption resulting from implemented efficiency measures. The photovoltaic deployment was completed in 2025, and the self-consumption percentage is expected to remain stable at around 14.5% in the coming years.

Since the 2022 upgrade of its air conditioning systems, compressors, and LED lighting, the Group has reduced its electricity consumption by 20.76%. This continuous improvement process was further strengthened in 2024 with the replacement of two split-type air conditioning units in the TC1 building. These actions continued in 2025 with the installation of a backup split-type unit in the new TC1 office (1st floor) and a ducted air conditioning unit in the data center of the same building.

Additionally, the sustainability training provided to more than 70% of the workforce reinforces the Group's commitment to energy efficiency and the transition to a more sustainable business model.

### Scenario 2022-2030.

As explained in the previous sections, the Línea Directa Group's Decarbonisation Plan is aligned with the Paris Agreement (-42% by 2030), exceeding the target and reaching a 48.19% reduction between 2022 and 2030. The main opportunity for improvement is in scope 2, which is reduced to 0 tCO<sub>2</sub> e.

The measures implemented allow for an annual monitoring plan in case unforeseen events beyond the company's control cause an increase in emissions. This is achieved by setting a target higher than that required by Royal Decree 214/2025.

This Decarbonisation Plan represents a roadmap that is subject to review, updating, and modification due to regulatory issues, activity, or current circumstances.

### E1-5. Energy consumption and mix.

The Línea Directa Group makes responsible use of its energy sources and is committed, in its Environmental Management and Climate Change Policy, to continuous improvement in energy efficiency.

Línea Directa 's activity falls within the category "**K. Financial and insurance activities**", and is therefore not considered a "high climate impacts" sector as listed in sections A, H and L of **Annex I of Regulation (EC) No 1893/2006 of the European Parliament and of the Council**.

The 2025 results show that the Group consumed 44% of its energy from renewable sources, a 4.5 percentage point increase compared to 2024. This is due to the implementation and successive expansions of photovoltaic plants at its parent company and subsidiary, CAR Madrid. During 2025, the Group generated 606.3 MWh through its solar panel installations. Furthermore, Línea Directa Aseguradora continues to consume all of its electricity from 100% renewable sources with Guarantees of Origin. The Group's total renewable energy consumption in 2025 amounted to 2,927.5 MWh, reflecting improved energy efficiency.

Regarding natural gas, 2,338 MWh were consumed, a slight variation of 1% compared to the previous year. In this respect, the company's headquarters building in Tres Cantos (TC3) and the office building in Pozuelo de Alarcón where Línea Directa Asistencia operates do not consume natural gas for their activities.

The parent company, Línea Directa Aseguradora, operates under a three-year objective approved in its 2023-2025 Sustainability Plan to reduce its consumption of grid electricity, natural gas, and heating oil by 15% by 2025 compared to 2022. By 2025, these consumption levels had been reduced by 29%. Natural gas consumption, compared to 2022, was reduced by 8%, heating oil consumption by 34%, and grid electricity consumption by 36%.

The Group continues to report in 2025 the percentage of the electricity mix coming from nuclear sources, maintaining the trend of the previous year with a value of 7.5%.

The following table breaks down the energy consumption for the years 2024 and 2025 of the Línea Directa Group:

| Energy consumption and mix                                                                                                                                             | Year 2024 | Year 2025 |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|
| 1) Fuel consumption from coal and coal products (MWh)                                                                                                                  | 0         | 0,0       |
| 2) Fuel consumption from crude oil and petroleum products (MWh)                                                                                                        | 76.9      | 178.3     |
| 3) Fuel consumption from natural gas (MWh)                                                                                                                             | 2,316     | 2,338.5   |
| 4) Fuel consumption from other fossil sources (MWh)                                                                                                                    | 0         | 0,0       |
| 5) Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)                                                                 | 905.5     | 709.2     |
| 6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)                                                                                       | 3,298.5   | 3,225.9   |
| Share of fossil fuel sources in total energy consumption (%)                                                                                                           | 46.6%     | 48.5%     |
| 7) Fuel consumption from nuclear sources (MWh)                                                                                                                         | 343.9     | 501.9     |
| Proportion of nuclear sources in total energy consumption (%)                                                                                                          | 4.9%      | 7.5%      |
| 8) Fuel consumption by renewable source, such as biomass (which also includes industrial and municipal waste of biological origin, biogas, green hydrogen, etc.) (MWh) | 0         | 0,0       |
| 9) Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)                                                              | 2,682     | 2,321.2   |
| 10) Consumption of self-generated non-fuel renewable energy (MWh)                                                                                                      | 752       | 606.3     |
| 11) Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)                                                                                  | 3,433.8   | 2,927.5   |
| Proportion of renewable sources in total energy consumption (%)                                                                                                        | 48.5%     | 44.0%     |
| Total energy consumption (MWh) (calculated as the sum of lines 6, 7 and 11)                                                                                            | 7,076.2   | 6,655.3   |

## E1-6. Gross emissions of scopes 1, 2, 3 and total greenhouse gases.

Línea Directa Aseguradora, as the parent company of the Línea Directa Group, has the following subsidiaries as of the end of fiscal year 2025 to be able to service its operations.

|                                               |                                                  |
|-----------------------------------------------|--------------------------------------------------|
| Línea Directa Aseguradora S.A.                | Owner of 100% of the capital of its subsidiaries |
| Línea Directa Assistance, S.L.U.              | Roadside assistance and appraisal company        |
| Centro Avanzado de Reparaciones (CAR), S.L.U. | Workshops in Madrid and Barcelona                |
| Amber Medline, S.L.U.                         | Insurance auxiliary activities company           |
| LDActivos, S.L.U.                             | Asset management company                         |

Operating on a direct model, the Group consolidates all its activity from a single hub in Tres Cantos, in the Community of Madrid, from where it coordinates service throughout Spain. Its headquarters and all other office buildings are located in this town.

The Carbon Footprint presented in this report is limited to the activities carried out by the Línea Directa Group. The following table lists all the buildings where the Group's activities take place and which are included in the scope of the calculation.

|                                                                                                  |
|--------------------------------------------------------------------------------------------------|
| Línea Directa Aseguradora TC1 - Isaac Newton, 7                                                  |
| Línea Directa Aseguradora TC2 - Isaac Newton, 9                                                  |
| Línea Directa Aseguradora TC3 - Torres Quevedo, 1                                                |
| Línea Directa Aseguradora TC4 - Ronda de Europa, 7                                               |
| Línea Directa Asistencia, El Plantío Business Park. Ochandiano Street No. 12, Pozuelo de Alarcón |
| CAR Madrid, Avenida Sol 9, Torrejón de Ardoz                                                     |
| CAR Barcelona, Montilla 3A, Sant Joan Despí                                                      |

The company's carbon footprint is calculated annually, allowing it to estimate the greenhouse gas (GHG) emissions associated with its activities and to establish appropriate measures for their reduction. The **Greenhouse Gas Protocol (GHG Protocol)** methodology was applied to calculate the 2025 carbon footprint. The Group's carbon footprint measures the greenhouse gas emissions generated directly and indirectly by its operations.

The calculation is performed using an operational control approach that includes all offices from which it operates and in which it carries out activities that fall under its direct control. Línea Directa Aseguradora, due to its direct model, without offices scattered throughout the country, concentrates all its direct and indirect issuances in four buildings located in Tres Cantos, Madrid, on one floor of an office building in Pozuelo de Alarcón, and in two workshops located in Madrid and Barcelona.

The Group consolidates 100% of the GHG emissions of the entities it controls from an operational perspective. The emissions inventory includes both those generated by organisational activity and those generated directly and indirectly by the use of offices.

The following tables show the GHG emission sources identified in the calculation of the Carbon Footprint for scopes 1, 2 and 3 according to the GHG Protocol standard.

## Emitting activities

| Scope                                              | Category                                                                                                                 | Emitting activities                                                                       | Activity data                                                                                                                                                                                                                                |
|----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Scope 1                                            | Direct emissions from the organisation whose source is owned or controlled by it                                         | Fuel consumption in fixed sources installed in the Group's companies: boilers, heaters.   | kWh of natural gas consumed.                                                                                                                                                                                                                 |
|                                                    |                                                                                                                          | Fuel consumption in stationary sources installed in offices: generators (Generating Sets) | Liters of Type B diesel consumed.                                                                                                                                                                                                            |
|                                                    |                                                                                                                          | Fluorinated gas leaks detected in air conditioning systems.                               | Kilograms of recharged gas.                                                                                                                                                                                                                  |
|                                                    |                                                                                                                          | Gas leaks from fire extinguishers                                                         | Kilograms of leaked gas.                                                                                                                                                                                                                     |
| Scope 2                                            | Indirect emissions associated with electricity consumption                                                               | Electricity consumption in the buildings of the Group companies                           | kWh of electricity purchased.                                                                                                                                                                                                                |
| Scope 3<br>Block I:<br>Upstream indirect emissions | Indirect emissions upstream of the organisation whose source is not owned or controlled by it                            |                                                                                           | The goods and services purchased or acquired by the Company.                                                                                                                                                                                 |
|                                                    |                                                                                                                          | Category 1. Purchase of goods and services                                                | Group paper consumption<br>Emissions generated by the Travel Assistance value chain: tow trucks, groupage, taxis, rental vehicles and verifications.<br>Water consumption in the Group's offices.<br>Emissions from the rental vehicle fleet |
|                                                    |                                                                                                                          | Category 2. Capital goods                                                                 | Capital goods purchased or acquired from suppliers.                                                                                                                                                                                          |
|                                                    |                                                                                                                          | Category 3. Fuel and energy-related activities (not included in scopes 1 or 2)            | Activities related to energy loss in the generation, transport and distribution of energy and fuel, which are not included in scopes 1 or 2.                                                                                                 |
|                                                    |                                                                                                                          | Category 4. Upstream transport and distribution                                           | The transport and distribution of products and services purchased or acquired by a company in vehicles and facilities that are not under its ownership or control. (Not significant)                                                         |
|                                                    |                                                                                                                          | Category 5. Waste generated in operations                                                 | The disposal and treatment by third parties of waste generated in operations under the ownership of the Group.                                                                                                                               |
|                                                    |                                                                                                                          | Category 6. Business travel                                                               | Employee travel for business-related activities in vehicles owned or controlled by third parties, including airplanes, trains, buses, and cars. This also includes accommodation.                                                            |
|                                                    |                                                                                                                          | Category 7. Employee Transportation                                                       | Employee travel between their homes and workplaces in vehicles owned by or under the ownership or control of other companies.                                                                                                                |
|                                                    |                                                                                                                          | Category 8. Upstream Leased Assets                                                        | The operation of assets leased by the Group. (Not significant)                                                                                                                                                                               |
|                                                    |                                                                                                                          | Category 9. Transportation and distribution                                               | Goods and services sent by the Group to third parties in its activity: postal shipments, courier services and transport of waste to the final manager.                                                                                       |
|                                                    |                                                                                                                          | Category 10. Process of sold products                                                     | The processing of products sold by third parties that require processing before use by the end consumer. (Not significant)                                                                                                                   |
|                                                    |                                                                                                                          | Category 11. Use of the products sold                                                     | The use of the products sold. (Not significant)                                                                                                                                                                                              |
|                                                    |                                                                                                                          | Category 12. End-of-life treatment of sold products                                       | The treatment of sold products at the end of their useful life, including waste treatment and disposal. (Not significant)                                                                                                                    |
|                                                    |                                                                                                                          | Category 13. Downstream Leased Assets                                                     | The operation of real estate assets that the Group leases to third parties.                                                                                                                                                                  |
|                                                    |                                                                                                                          | Category 14. Franchises                                                                   | The operation of franchises. (Not significant)                                                                                                                                                                                               |
| Category 15. Investments                           | Investments, including equity investments, debt investments, project finance, managed investments and customer services. |                                                                                           |                                                                                                                                                                                                                                              |

Due to the Group's non-life insurance business and its direct business model Scope 3 categories 4, 8, 10, 11, and 12 do not apply to its calculations. Likewise, it does not report Scope 3 category 14, as it does not operate under a franchise model.

A comparison of the Group's GHG emissions with respect to the previous year 2024 is presented.

In its Scope 2 gross GHG emissions report, the Group follows the recommendations of the GHG Protocol, considering electricity consumption in the Group's offices as an emitting activity. The report includes both approaches:

- 1) The one based on location, which applies the emission factor of the Ministry for Ecological Transition to the mix of suppliers with which it contracts the supply.
- 2) And the market-based approach, which takes into account the market conditions agreed with the marketers regarding the renewable origin of the electricity and which is certified through Guarantees of Origin.

In the Scope 2 report, only active energy consumption is considered, since energy losses are accounted for in category 3 of Scope 3.

During the second half of 2025, the Chamberí building ceased to be leased, so during that period the emissions generated in the building due to the energy rehabilitation works of the same, have been assumed by LDActivos, being counted within Scope 1.

The Línea Directa Group is not part of the emissions trading scheme and therefore does not include in Scope 2 any carbon credits or GHG emission allowances purchased, sold, or transferred. Furthermore, it does not report within Scope 3 the measurement of emissions from purchased cloud computing and data center services.

The Group has applied the following formula to calculate total GHG emissions:

- Total location-based GHG emissions (t CO<sub>2</sub> eq) = gross scope 1 emissions + gross location-based scope 2 emissions + gross scope 3 emissions Total
- Market-based GHG emissions (t CO<sub>2</sub> eq) = gross scope 1 emissions + market-based gross scope 2 emissions + gross scope 3 emissions

Emissions are calculated using different emission factors that are adjusted according to the activity data. For the calculation of scopes 1 and 2, emission factors published by the Ministry for Ecological Transition in its calculator “Emission Factors 2007-2024” version 5, from May 2025, were used.

To calculate Scope 3 emissions, different emission factors were used depending on the primary data source. For converting revenue and investment data by economic sector, econometric factors from the EPA's "Supply Chain GHG Emission Factors\_v1.3.0 EPA 2024" were used, updated to account for inflation and currency changes.

On the other hand, for the calculation of emissions generated by travel by means of transport and for some of the waste generated in the Group's activity, conversion factors from the Department for Environment Food & Rural Affairs and the Department for Energy Security Net Zero have been used in their report “UK Government GHG Conversion Factors for Company Reporting” in its version 1.0 of 2025.

To calculate the carbon emissions of the fleet that the Group makes available to its customers through its network of workshops, the emissions that appear in the technical data sheets of the models that are in service have been used.

The general calculation of waste has been supported by the report published by the Catalan Office of Climate Change of the Department of Climate Action, Food and Rural Agenda “Guide to calculate gas emissions with winter effects” in version No. 1 of May 28, 2025.

Business travel emissions have been calculated using various sources. Emissions from train journeys are provided by the different companies used. The conversion factor for hotel nights and rental car kilometers was obtained from the travel calculator published by the CeroCO<sub>2</sub>.org initiative and from DEFRA 2025. Finally, air travel emissions are converted using the calculator published by the ICAO (International Civil Aviation organisation) under the name “ICAO Carbon Emissions Calculator (ICEC)” and, failing that, from DEFRA 2025.

The following table shows the emissions of the Línea Directa Group.

| AR 48 (E1-6)                                                                     | Retrospective     |           |                   | Milestones and target years |      |      |                             |
|----------------------------------------------------------------------------------|-------------------|-----------|-------------------|-----------------------------|------|------|-----------------------------|
|                                                                                  | Base Year<br>2024 | 2025      | % 2025 vs<br>2024 | 2026                        | 2030 | 2050 | Annual%<br>target/base year |
| <b>Scope 1 GHG emissions</b>                                                     |                   |           |                   |                             |      |      |                             |
| Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)                                | 527.13            | 474.49    | (10.0)%           | -                           | -    | -    | -                           |
| Percentage of Scope 1 GHG emissions from regulated emissions trading schemes (%) | —%                | —%        | —%                | N.A.                        | N.A. | N.A. | N.A.                        |
| <b>Scope 2 GHG emissions</b>                                                     |                   |           |                   |                             |      |      |                             |
| Location-based brute scope 2 GHG emissions (tCO <sub>2</sub> eq)                 | 1,007.53          | 384.64    | (61.8)%           | N.A.                        | N.A. | N.A. | N.A.                        |
| Market-based scope 2 brute GHG emissions (tCO <sub>2</sub> eq)                   | 310.00            | 359.48    | 16.0%             | -                           | -    | -    | -                           |
| <b>Scope 3 GHG emissions</b>                                                     |                   |           |                   |                             |      |      |                             |
| Total gross indirect GHG emissions (scope 3) (tCO <sub>2</sub> eq)               | 134,051.0         | 112,831.8 | (15.8)%           | -                           | -    | -    | -                           |
| 1. Goods and services purchased                                                  | 52,213.0          | 48,869.7  | (6.4)%            | -                           | -    | -    | -                           |
| Optional subcategory: Cloud computing and data center services                   | -                 | -         | -                 | -                           | -    | -    | —%                          |
| 2. Capital goods                                                                 | 319.5             | 575.1     | 80.0%             | -                           | -    | -    | -                           |
| 3. Fuel and energy-related activities (not included in scopes 1 and 2)           | 343.0             | 322.8     | (5.9)%            | -                           | -    | -    | -                           |
| 4. Upstream transportation and distribution                                      | N.A.              | N.A.      | N.A.              | N.A.                        | N.A. | N.A. | N.A.                        |
| 5. Waste generated in operations                                                 | 29.7              | 29.0      | (2.3)%            | -                           | -    | -    | -                           |
| 6. Business trips                                                                | 20.1              | 27.3      | 36.1%             | -                           | -    | -    | -                           |
| 7. Employee commuting                                                            | 2,163.4           | 2,229.8   | 3.1%              | -                           | -    | -    | -                           |
| 8. Upstream leased assets                                                        | N.A.              | N.A.      | N.A.              | N.A.                        | N.A. | N.A. | N.A.                        |
| 9. Downstream transportation and distribution                                    | 444.0             | 287.0     | (35.4)%           | -                           | -    | -    | -                           |
| 10. Processing of sold products                                                  | N.A.              | N.A.      | N.A.              | N.A.                        | N.A. | N.A. | N.A.                        |
| 11. Use of the products sold                                                     | N.A.              | N.A.      | N.A.              | N.A.                        | N.A. | N.A. | N.A.                        |
| 12. End-of-life treatment of sold products                                       | N.A.              | N.A.      | N.A.              | N.A.                        | N.A. | N.A. | N.A.                        |
| 13. Downstream leased assets                                                     | 254.0             | 219.1     | (13.7)%           | -                           | -    | -    | -                           |
| 14. Franchises                                                                   | N.A.              | N.A.      | N.A.              | N.A.                        | N.A. | N.A. | N.A.                        |
| 15. Investments                                                                  | 78,264.0          | 60,272.0  | (23.0)%           | -                           | -    | -    | -                           |
| <b>Total GHG emissions</b>                                                       |                   |           |                   | <b>Total general</b>        |      |      |                             |
| Total GHG emissions (location based) (tCO <sub>2</sub> eq)                       | 135,585.0         | 113,690.9 | (16.1)%           |                             |      |      |                             |
| Total GHG emissions (market-based) (tCO <sub>2</sub> eq)                         | 134,888.0         | 113,665.8 | (15.7)%           |                             |      |      |                             |

\*The Scope 1 calculation includes natural gas emissions calculated from consumption as per billing.

The emissions reduction targets and milestones for 2030 are reflected in the Reduction Plan in section E1-4 Goals related to climate change mitigation and adaptation.

Regarding GHG intensity, during the 2025 financial year, it has been as follows:

|                                                                  |                              |
|------------------------------------------------------------------|------------------------------|
| <b>Intensity tCO<sub>2</sub> /net income (based on location)</b> | 0.000100 tCO <sub>2</sub> /€ |
| <b>Intensity tCO<sub>2</sub> /net income (market based)</b>      | 0.000100 tCO <sub>2</sub> /€ |

The calculation assumes the relationship between the GHGs emitted by the Group based on location or market with respect to the total revenues of the section of the Group's consolidated statement of profit or loss as of December 31, 2025.

In 2025, the CO<sub>2</sub> intensity per tonne of net revenue was 0.000100 tCO<sub>2</sub>/€ for both cases. Total revenue amounted to € 1,133,198,000.

In comparison to the CO<sub>2</sub> intensity per tonne of net income in 2024, which was 0.000129 tCO<sub>2</sub>/€ and total income of 1,051,788 thousand euros

Of the total scope 3 emissions, in 2025 9.28% (10,473 t CO<sub>2</sub>) have been calculated using primary data from suppliers or other value chain partners compared to 34.647% (46,430.94 t CO<sub>2</sub>) for the 2024 fiscal year.

### **E1-7. GHG offsetting and mitigation projects financed through carbon credits.**

Línea Directa considers climate change one of the greatest challenges facing society. Operating in a European Union member state, it has incorporated into its sustainability strategy a line of action aimed at reducing its emissions and progressively transitioning to a low-carbon economy. The increasing concentration of greenhouse gases in the atmosphere resulting from human activity demands a re-evaluation of our economic growth model, and the rise in global temperature compels us to take action given the serious threats posed by its physical risks.

Línea Directa has a roadmap to decarbonize its activity in the coming years and, among other things, carries out an analysis of all its activity to identify, account for and have an inventory of greenhouse gas emissions that allows it to make reduction decisions.

With a firm commitment to mitigating the effects of climate change to contribute to the goals set in the Paris Agreement and considering the need to adapt to possible transition scenarios to achieve them, the Group has made a strong effort in recent years to reduce its emissions.

Since 2023, Línea Directa has calculated its emissions across its three scopes. Scope 3 includes the analysis of the 15 categories outlined in the GHG Protocol methodology. This aims to improve the management capacity of a greater number of emission sources and establish reduction targets in various areas, given that Scope 1 and 2 emissions are on track to reach maximum efficiency or be eliminated in the coming years. This information is presented in greater detail in subchapter E1-6 Carbon Footprint.

In 2022 Línea Directa fully offset its scopes 1 and 2, which amounted to a total of 294 tCO<sub>2</sub> eq.

Línea Directa has fully offset its Scope 1 carbon footprint for 2023, equivalent to 149 tons of CO<sub>2</sub>. In Scope 2, by generating 100% of its electricity with photovoltaic panels, there were no greenhouse gas emissions. To offset its Scope 1 emissions, Línea Directa uses the voluntary carbon credit market, acquiring carbon credits through the Eulen Group's management company. This is achieved through a reforestation project covering 68 hectares with Scots pine in the Gredos region. This project is registered in the carbon footprint, offsetting, and carbon dioxide absorption projects section of the Spanish Office for Climate Change (OECC), under the Ministry for Ecological Transition and the Demographic Challenge.

It is important to emphasize that the fact that carbon credits are certified by the OECC means they have undergone a rigorous process that guarantees the quality and effectiveness of the offset projects. These projects must be registered in the Carbon Footprint, Offsetting, and CO<sub>2</sub> Absorption Projects Registry, where it is verified that they generate real and additional reductions or eliminations of emissions.

In the medium term, Línea Directa will continue to offset its scope 1 and will offset some of the scope 3 categories, starting with category 7, related to employee transport.

Línea Directa has calculated and verified the 2024 carbon footprint, having submitted the application for the "calculate, compensate and reduce" certificates to MITERD.

At the close of the financial year, its resolution is pending, in order to subsequently proceed with the remuneration of the 265.66 tons of CO<sub>2</sub> corresponding to Scope 1 of said financial year.

The following graphically shows the data on carbon credits cancelled by Línea Directa in 2024.

| Carbon credits planned to be cancelled in the future                  | Comparative                        | Year |
|-----------------------------------------------------------------------|------------------------------------|------|
| Total (tCO <sub>2</sub> eq)                                           | 265.66 tCO <sub>2</sub> eq         | 2024 |
| Share from removal projects (%)                                       | 100%                               | 2024 |
| Shared for reduction projects (%)                                     | —%                                 | 2024 |
| Recognised quality standard 1 (%)                                     | 100% Spanish Climate Change Office | 2024 |
| Share from projects within the EU (%)                                 | 100%                               | 2024 |
| Share of carbon credits that qualify as corresponding adjustments (%) | 100%                               | 2024 |

## E1-8. Internal price of carbon.

During 2024, Línea Directa established a methodology for setting its internal carbon price, which has been presented to and approved by the following governing bodies: the Sustainability Working Group and the Sustainability Committee. This internal carbon price serves to quantify and monetize the costs arising from the Group's carbon emissions.

Based on the external analysis carried out, using sources such as CDP and various studies by specialized consulting firms, as well as other standards and frameworks such as TCFD, UNPRI, and ETS such as IPCC and NGFS, Línea Directa has opted to set a shadow price for 100% of Scope 1 emissions (464 Tn CO<sub>2</sub> eq, representing 0.1% of total emissions) and Scope 2 emissions (346 tCO<sub>2</sub> eq, representing 0.009% of total emissions), with 2023 as the base year. The shadow price applies to Scope 1 and 2 emissions established for the Línea Directa Group, which has its operations in Spain, within the European Union.

After reviewing all carbon prices, from both mandatory and voluntary mechanisms, a price has been chosen that:

- 1 It reflects European reality.
- 2 It is useful for responding to analysts and Indexes such as DJSI or CDP.
- 3 It is considered sufficiently challenging by major investors
- 4 It serves to progressively raise awareness of the future risk of the emergence of mandatory mechanisms.
- 5 It allows for review in future exercises.

To establish the Internal Carbon Price, the Group reviewed the evolution of carbon prices up to 2023 in the European Union's Emission Trading System. It also consulted other sources such as the IPCC and the NGFS and analyzed the costs of offsetting through credits certified

under national (Spanish Office for Climate Change - OECC) and international (Verified Carbon Standard - VCS) standards.

Finally, Línea Directa 's Internal Carbon Price has been set according to the highest concentration of companies analyzed with shadow pricing in Europe, according to the report "Putting a price on carbon. The state of internal carbon pricing by Corporates globally (2021)", published by CDP, the latest available.

This price will be reviewed in future periods to adapt it to the realities of the carbon credit market. Furthermore, Línea Directa working to link the internal carbon price to its financial statements in the future.

In 2025, the Internal Carbon Price has remained on the same terms as its approval in fiscal year 2024.

### **E1-9. Anticipated financial effects from material physical and transition risks and potential climate-related opportunities.**

Consistent with the results of the climate risk analysis, detailed in subchapter IRO-1, Description of the processes for determining and assessing the impacts, risks, and opportunities of relative importance related to climate change, and in the 2025 TCFD Report, with specific data from the previous year, Línea Directa Aseguradora, the Línea Directa Group, has assessed only one of the identified climate-related risks as material, within the theme "Mitigation and adaptation to climate change through business" and the sub-theme "Adaptation to climate change" - Increase in the severity, frequency, and duration of extreme weather events.

Regarding transition risks, a specific methodology has been applied to each of the scenarios developed to estimate the impacts of these risks:

- Regulatory changes affecting marketed products. In this risk, the insurer has calculated the impacts on the profit and loss account of the following working hypotheses regarding products marketed in its motor insurance line:
- Quantitative projection of a possible portfolio outsourcing.
- Quantifying the impacts of an increase in the portfolio of hybrid and electric vehicles.
- Assessment of the effect of a greater age of the insured vehicle fleet.
- Calculation of portfolio decline due to decrease in the vehicle fleet.
- Based on the assumption of an increase in regulatory capital requirements (direct impacts on the Company's solvency ratio) due to risks associated with climate change, this calculation considers the high probability that sustainability risk will become regulatory and therefore be included in the calculation of solvency capital under Pillar I within the next five years. Two scenarios are considered:
- Moderate transition scenario – in which the potential regulatory capital requirement for climate risk is close to the internal assessment currently being carried out by the Group for its ORSA exercise.
- Aggravated transition scenario – in which the potential regulatory capital requirement for climate risk approaches the current standard formula requirement for operational risk.

- Increased costs are expected to adapt to new requirements, stemming from the need for an increased workforce of qualified personnel specifically dedicated to climate change, as well as the resources allocated to analyzing and monitoring the value chain in relation to new environmental requirements, obtaining certifications, and managing new regulatory compliance requirements. Two scenarios are considered: one structured and the other unstructured. In both cases, the quantitative impacts of increased resources in personnel, consulting, and certifications is assessed to address this necessary adaptation.
- Potential exclusions from investment in certain sectors due to market trends. In this regard, the Group is considering the possibility of disengaging from or not participating in profitable businesses due to reputational risk or industry regulations that prohibit it. Two scenarios are being considered: the first involves a gradual sale of the stake in these businesses, minimizing losses; the second involves a sudden and global divestment, anticipating a total loss of market share.

Despite continuing to avail itself of the reporting moratorium provided for in Appendix C of ESRS 1 of this subchapter in 2025 to omit the information of this requirement in the preparation of the Sustainability Report, and in line with the development of climate risk analysis and the CSRD regulatory framework, Línea Directa will continue working to be able in the future to calculate and report the anticipated financial effects derived from physical and material transition risks, as well as possible opportunities related to climate change, trying to respond in this way in the future to the requirements of subchapter E1-9.

## Pollution (ESRS E2)

### Impact, risk and opportunity management

#### **IRO-1. Description of the processes to identify and assess material pollution-related impacts, risks, and opportunities**

For the assessment of impacts, risks and opportunities, the process developed in greater detail in chapter ESRS 2 Impact, Risk and Opportunity Management has been followed.

During the identification process, a Positive impact was detected, which was reassessed in 2025 by the Sustainability Working Group and reviewed by the Sustainability Committee. However, after analyzing the Group's management framework and the probability of the risk occurring in the short-, medium-, and long-term, it was deemed immaterial as a result of the Double Materiality analysis, the methodology of which is described in greater detail in Chapter ESRS 2, Incident, Risk, and Opportunity Management.

During the analysis, management tools such as the Principles of Action on Sustainability, the Principles of Action of the Corporate Policy on Sustainability/ESG Risk Management, the Environmental Statement, the Climate Change Statement, the Sustainable Finance Identification Guide, the Code of Ethics, the Sustainability Risk Integration Policy, the Statement of Principal Adverse Impacts, and the Environmental and Climate Strategy have been used.

Furthermore, it is important to highlight that for the assessment of the IROs initially carried out in 2024, consultations with four of the main Stakeholders for Línea Directa were taken into account through their participation in surveys and, in a complementary manner, focus groups have been carried out with the employees of the Group, as well as interviews with members of the management of Línea Directa Aseguradora.

The objective of these surveys is to incorporate the opinion of the Stakeholders in the assessment of the topics and Sub-topics and to be able to obtain a more comprehensive result.

For the review and re-evaluation of the IROs in 2025, a consultation was carried out with the Sustainability Working Group, submitting the results to the Sustainability Committee.

## Water and marine resources (ESRS E3)

### Impact, risk and opportunity management

#### **IRO-1. Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities.**

For the assessment of impacts, risks and opportunities, the process developed in greater detail in chapter ESRS 2 Impact, Risk and Opportunity Management has been followed.

During the identification process, a negative impact was detected, which was reassessed in 2025 by the Sustainability Working Group and reviewed by the Sustainability Committee. However, after analyzing the Group's management framework and the probability of the risk occurring in the short-, medium-, and long-term, it was deemed immaterial as a result of the Double Materiality analysis, the methodology of which is described in greater detail in Chapter ESRS 2, Incident, Risk, and Opportunity Management.

During the analysis, management tools such as the Principles of Action on Sustainability, the Principles of Action of the Corporate Policy on Sustainability Risk Management/ESG, the Environmental Statement, the Climate Change Statement, the Sustainable Finance Identification Guide, the Code of Ethics, the Policy on Integrating Sustainability Risks, the Statement of Major Adverse Impacts, and the Environmental and Climate Strategy have been used.

Furthermore, it is important to highlight that for the assessment of the IROs, consultations with four of the main Stakeholders for Línea Directa have been taken into account through their participation in surveys and, in a complementary manner, focus groups have been carried out with the employees of the Group, as well as interviews with members of the management of Línea Directa Aseguradora.

The objective of these surveys is to incorporate the opinion of the Stakeholders in the assessment of the topics and Sub-topics and to be able to obtain a more comprehensive result.

For the review and re-evaluation of the IROs in 2025, a consultation was carried out with the Sustainability Working Group, submitting the results to the Sustainability Committee.

## Biodiversity and ecosystems (ESRS E4)

### Impact, risk and opportunity management

#### **IRO-1. Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities.**

For the assessment of impacts, risks and opportunities, the process developed in greater detail in chapter ESRS 2 Impact, Risk and Opportunity Management has been followed.

During the identification process, a Positive impact was detected, which was reassessed in 2025 by the Sustainability Working Group and reviewed by the Sustainability Committee. However, after analyzing the Group's management framework and the probability of the risk occurring in the short-, medium-, and long-term, it was deemed immaterial as a result of the Double Materiality analysis, the methodology of which is described in greater detail in Chapter ESRS 2, Incident, Risk, and Opportunity Management.

During the analysis, management tools such as the Principles of Action on Sustainability, the Principles of Action of the Corporate Policy on Sustainability Risk Management/ESG, the Declaration on Nature, the Environmental Management Plan 2022-2024, the Environmental Declaration, the Principles of Environmental and Energy Management, the Declaration on Climate Change, the Climate Report or the Declaration of Main Adverse Impacts have been used.

Furthermore, it is important to highlight that for the assessment of the IROs, consultations with four of the main Stakeholders for Línea Directa have been taken into account through their participation in surveys and, in a complementary manner, focus groups have been carried out with the employees of the Group, as well as interviews with members of the management of Línea Directa Aseguradora.

The objective of these surveys is to incorporate the opinion of the Stakeholders in the assessment of the topics and Sub-topics and to be able to obtain a more comprehensive result.

For the review and re-evaluation of the IROs in 2025, a consultation was carried out with the Sustainability Working Group, submitting the results to the Sustainability Committee.

## Resource use and circular economy (ESRS E5)

### Impact, risk and opportunity management

#### **IRO-1. Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities.**

For the assessment of impacts, risks and opportunities, the process developed in greater detail in chapter ESRS 2 Impact, Risk and Opportunity Management has been followed.

During the identification process, a Positive impact and a risk were detected, which were reassessed in 2025 by the Sustainability Working Group and reviewed by the Sustainability Committee. However, after analyzing the Group's management framework and the probability of the risk occurring in the short-, medium-, and long-term, they were deemed immaterial as a result of the Double Materiality analysis, the methodology of which is described in greater detail in Chapter ESRS 2, Impacts, Risk, and Opportunity Management.

During the analysis, management tools such as the Environmental Declaration, the Environmental Management Plan 2022-2024, and the Climate Report were used.

Furthermore, it is important to highlight that for the assessment of the IROs, consultations with four of the main Stakeholders for Línea Directa have been taken into account through their participation in surveys and, in a complementary manner, focus groups have been carried out with the employees of the Group, as well as interviews with members of the management of Línea Directa Aseguradora.

The objective of these surveys is to incorporate the opinion of the Stakeholders in the assessment of the topics and Sub-topics and to be able to obtain a more comprehensive result.

For the review and re-evaluation of the IROs in 2025, a consultation was carried out with the Sustainability Working Group, submitting the results to the Sustainability Committee.

## Investment with ESG criteria (Entity-specific)

### Governance

#### **GOV-1. The role of the administrative, management and supervisory bodies.**

The governance model for sustainable investment at Linea Directa Group, as set out in the Sustainable Investment Policy, is structured around a clear and well-defined framework that ensures the integration of ESG criteria into investment processes and the monitoring of their compliance.

The role of each supervisory and governing body in terms of sustainable investment is detailed below:

- **Investment Department.**

He is primarily responsible for implementing ESG criteria in the search, analysis, and evaluation of investment opportunities.

This department evaluates the investment portfolio using ESG criteria, ensuring compliance with the guidelines established in the Sustainable Investment Policy.

- **Investment Committee.**

Oversee investment management and make decisions in line with the Sustainable Investment Policy, respecting applicable internal and legal regulations.

Committee members have the authority to invite experts, such as the Director of Sustainability, to provide advice on specific issues. While these experts do not have authorizing or decision-making power, their advice is considered an additional factor in the Committee's decision-making process.

This Committee reports periodically, at least every three months, to the Board of Directors through the Chief Financial Officer, reporting on the implementation of the Sustainable Investment Policy and, in addition, submits to the Board for approval the investments that are within its competence.

- **Board of Directors.**

It plays a key role in the global oversight of Sustainable Investment Policy. It receives regular updates on its implementation and approves investments that fall within its purview in accordance with applicable regulations.

Likewise, the Board approves any modification or update of the Sustainable Investment Policy, following a report from the Audit and Compliance Committee and the Appointments, Remuneration and Corporate Governance Committee.

On the other hand, the periodic review of the Sustainable Investment Policy is the responsibility of the Investment Committee, which assesses the suitability of its content in light of regulatory or strategic changes. Any proposed modifications are submitted to the Board of Directors for approval, following analysis by the relevant committees.

Finally, for the supervision of ESG risks in the underwriting process, the Group has the Product Governance and Control Committee, which, among its functions, includes the review of products and the Risk Committee.

Regarding the composition and diversity of the members of the various governing bodies, and their capabilities and expertise in this area, this information is reflected in Chapter ESRS 2, Governance. Furthermore, the governing bodies monitor the establishment of targets related to material issues, risks, and opportunities and track progress toward achieving them, as detailed in Subchapter MDR-P, Policies adopted to manage material sustainability issues.

Taken together, this structure ensures that ESG criteria are effectively integrated into the investment strategy, under active supervision and sound governance, aligned with sustainability principles and the applicable regulatory framework.

## Strategy

### **SBM-3. Material impacts, risks and opportunities and their interaction with strategy and business model.**

Línea Directa Aseguradora, through the double materiality analysis carried out in 2024 and updated in 2025, whose methodology is indicated in chapter ESRS 2 Impacts, risks and opportunities management, has identified one Positive impact and three material opportunities for the Group, as shown in subchapter IRO-1 Description of the processes to determine and evaluate impacts, risks and opportunities of relative importance related to investment with ESG criteria.

This impact and these opportunities are related to and linked with its strategy and business model. Responsible Investment is one of the strategic lines of Línea Directa 's Fifth Sustainability Plan 2023-2025. This line prioritizes ESG action, which led to the actions taken.

Continuing with the approach of managing Impacts, Risks and Opportunities, the VI Sustainability Plan approved in 2025 includes Sustainable Investment as a strategic line, which develops the actions that will be carried out in the next three years.

The material opportunities and impacts are linked to meeting the needs of customers and the Group to transition to a sustainable economy by directing investment towards more responsible activities that meet specific sustainability criteria. To enhance this, the company has policies, such as the Responsible Investment Policy, which establishes the foundation for the Group's investment criteria, guiding Línea Directa 's investment towards more responsible activities that comply with the criteria set forth in this policy, as well as establishing the principles for the engagement activities carried out by Línea Directa. Furthermore, the Group has made progress in aligning both its activities and investments with the European Taxonomy and has made commitments through its adherence to the UN Principles for Responsible Investment and the submission of its first PRI report in 2025.

## Impact, risk and opportunity management

### **IRO-1. Description of the processes to identify and assess material impacts, risks, and opportunities related to investment with ESG criteria.**

As developed in greater detail in chapter ESRS 2 Impacts, risks and opportunities management, the following process was followed in 2024 for the assessment of impacts, risks and opportunities, and revised in 2025:

1. First, a context analysis was carried out, using both internal and external sources of information, to obtain a first approximation of potentially material issues from a cross-cutting sustainability perspective.
2. Secondly, a preliminary identification of the topics and Sub-topics was carried out, defined from the list of Topics, Sub-topics and Sub-sub-topics proposed in ESRS 1 AR 16 and from the previous material of the Group.
3. Thirdly, the Impacts, Risks and Opportunities (IROs) were identified, examining and considering the information present in the sources used in the first phase of the project.
4. Fourthly, based on the quantitative data provided to each IRO, the consultations carried out with the different Stakeholders and the Group's management framework, the materiality value of each of them was obtained.
5. Finally, the material themes were obtained, identifying 11 material environmental, social and governance (ESG) issues.

| Sub-topic              | Sub-topic linked to ESRS | Positive / Negative Risk / Opportunity | IRO Description                                                                                                                                                                                                      | Value chain                                                         |
|------------------------|--------------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| Responsible investment | Entity-specific          | Positive impact                        | Contribution to emissions reduction through investment in companies that are committed to the use of renewable energy or projects aimed at reducing their emissions                                                  | Upstream – Shareholders / Investors                                 |
| Responsible investment | Entity-specific          | Opportunity                            | Investment in sectors that contribute to mitigating climate change                                                                                                                                                   | Upstream – Shareholders / Investors<br>Downstream<br>Own Operations |
| Responsible investment | Entity-specific          | Opportunity                            | Make responsible investments such as real estate assets with good energy certifications, green bonds or blue bonds, and even other investment products that may be considered within article 8 or 9 of SFDR.         | Upstream – Shareholders / Investors<br>Downstream<br>Own Operations |
| Responsible investment | Entity-specific          | Opportunity                            | Invest in companies that have a clearly environmentally and socially responsible strategy and focus on activities that facilitate the reduction of emissions and the fight against climate change in all its facets. | Upstream – Shareholders / Investors<br>Downstream<br>Own Operations |

In relation to investment under ESG (environmental, social and governance) criteria, one Positive impact and three opportunities were identified as material. These have been determined through a double materiality analysis whose methodology is described in greater detail in chapter ESRS 2 Management of impacts, risks and opportunities.

Furthermore, it is important to highlight that for the assessment of the IROs, consultations with four of the main Stakeholders for Línea Directa were taken into account through their participation in surveys and, in a complementary manner, focus groups were carried out with the employees of the Group, as well as interviews with members of the management of Línea Directa Aseguradora.

The objective of these surveys was to incorporate the opinion of the Stakeholders in the assessment of the topics and Sub-topics and to be able to obtain a more comprehensive result.

A significant Positive impact was identified, directly affecting shareholders and investors across the upstream value chain. This impact, global in scope and with a short- to medium-term timeframe, is linked to emissions reductions, the effects of which extend internationally. The analysis of this impact was supported by key management tools, notably the Sustainability Policy, the Environmental Management and Climate Change Policy, the Sustainable Investment Policy, and the 2023-2025 Sustainability Plan.

In addition, three material opportunities were identified that affect both the company's own operations and the upstream and downstream value chain, particularly in relation to shareholders and investors.

In 2025, through consultation with the Sustainability Working Group and subsequent supervision by the Sustainability Committee, a review of the Double Materiality exercise was carried out, the result of which was the maintenance of the material issues and IROs initially identified.

### **MDR-P. Policies adopted to manage material sustainability matters.**

The Group's Sustainable Investment Policy establishes a framework for integrating environmental, social and governance (ESG) criteria into investment management, with the aim of preventing, mitigating and remedying real and potential impacts, addressing risks and taking advantage of opportunities related to sustainability.

By implementing this policy, the Group aligns with international standards such as:

- United Nations Principles for Responsible Investment (PRI).
- European Union Green Taxonomy and associated regulations.
- United Nations Sustainable Development Goals (SDGs).
- International climate agreements, such as the Paris Agreement.

The Sustainable Investment Policy aims to ensure that all of the Group's investments are managed responsibly, minimizing ESG risks, maximizing opportunities for Positive impact, and fostering sustainable economic development. Its overall goals include the active management of ESG risks, the establishment of specific guidelines for each asset class, and the exclusion of activities that could have a significant negative impact on sustainability.

To this end, the policy details the ESG factors considered. In the environmental sphere, it incorporates indicators related to climate change, such as greenhouse gas emissions, alignment with the mitigation and adaptation targets defined by the taxonomy, pollution prevention and control, and the protection of biodiversity and ecosystems. In the social sphere, it promotes respect for Human Rights and the absence of serious labor disputes, in addition to limiting exposure to emitters operating in controversial sectors to 8% of the Group's total portfolio value. Regarding corporate governance, it assesses criteria such as business ethics, the fight against corruption, and the proper management of political lobbying activities.

Furthermore, the policy covers the entire investment portfolio of the Línea Directa Group, including existing assets and new investments, and establishes limitations and the divestment of positions by 2030 in investments made by the Group in activities with significant adverse

impacts, such as carbon-intensive energy sectors, controversial weaponry, and adult entertainment. It also defines guidelines by asset type, such as the assessment of ESG risk in sovereign and corporate debt, the consideration of energy efficiency and certifications in real estate assets, and alignment with ESG criteria in alternative financial products.

The Línea Directa Group adopts a results-based approach, using tools validated by independent third parties to assess portfolio alignment with established ESG criteria. Quarterly assessments are conducted, including parameters such as ESG risk, exposure to sensitive sectors, and greenhouse gas emissions. These assessments allow for the identification of areas for improvement and, where necessary, the implementation of corrective measures, such as reducing positions or divestitures.

The policy also stipulates that the Línea Directa Group will exercise its right to vote, after verifying that the decision to be made complies with the framework of this policy. To this end, it will have access to all necessary information, including ESG aspects, to determine its vote. Based on the relevance of the identified controversies, the materiality of Línea Directa 's exposure, and the information received, the implications of the initiatives submitted for a vote, including ESG aspects, will be reviewed to determine its vote.

The Board of Directors oversees the implementation of the policy, receiving quarterly reports from the Investment Committee. The latter, together with the Investment Department, is responsible for applying ESG criteria and reporting the results. Furthermore, the interests of key Stakeholders, such as shareholders and customers, have been taken into account during the development and implementation of the policy, ensuring a balance between profitability and sustainability.

Finally, the Sustainable Investment Policy is available to Stakeholders on the Group's corporate intranet and on its official website, reflecting Línea Directa Aseguradora's commitment to transparency and responsibility.

## **MDR-A. Actions and resources in relation to material sustainability matters.**

During 2025, Línea Directa has carried out different actions related to ESG-focused investment, among which the following stand out:

- **Presentation of the first Transparency Report of Principles for Responsible Investment (PRI).**

Línea Directa maintains its adherence and commitment to the Principles for Responsible Investment (PRI), the main United Nations initiative as a driver of responsible investment on a global scale.

The PRI working group publicizes the important implications of environmental, social and governance (ESG) factors for investments and promotes initiatives to help its international network of signatory investors incorporate these factors into their investment and participation decisions.

In 2025, as part of PRI's annual reporting cycle, Línea Directa completed its first Transparency Report. This report comprises the following sections, on which information is reported: (SLS) Senior Leadership Statement, (ORO) Other Responsible Investment Reporting Obligations, (PGS) Policy, Governance and Strategy, and (CBM) Confidence Building Measures.

The presentation of this report, prepared jointly by the organisation's Finance, Sustainability, and Corporate Governance departments, is another step toward progress and transparency

within the Group in this area. In the coming years, it will be available on the PRI website's Data Portal for consultation by Stakeholders.

- **Calculating the carbon footprint.**

Línea Directa has carried out the update of the carbon footprint calculation for scopes 1 and 2 using its own resources from the sustainability department. However, for the update of scope 3, it has had the support of an external consultancy, whose investment cost has amounted to 5,850 euros plus VAT.

The carbon footprint has a consolidated scope that includes all subsidiaries of the group with an annual time horizon.

- **Review and update of the degree of alignment with the EU taxonomy.**

Annually, using its own resources, Línea Directa Aseguradora has reviewed and updated its eligibility and alignment with the European Union's taxonomy of premiums and investments.

- **ESG valuation of the investment portfolio through a KRI and with the valuation provided by a tool endorsed by an independent third party.**

The investment department of the Línea Directa Group will develop a dashboard by 2026 to review its investment portfolio using information from a tool endorsed by an independent third-party expert in the field. This tool provides an assessment of the ESG aspects of the portfolio's holdings. This evaluation model will be developed in 2026, establishing risk quantification criteria to inform decision-making.

In 2025, the Línea Directa Group continued with the methodology for establishing the internal carbon price, which was presented to and approved by the Group. This internal carbon price, acting as a shadow price, serves to quantify and convert the Group's Scope 1 and 2 carbon emissions into estimated costs. This instrument is explained in greater detail in subchapter E1-8 Internal Carbon Pricing.

Finally, as detailed in the Taxonomy chapter, in 2025 the Línea Directa Group reviewed and updated the degree of alignment with the European taxonomy, taking into account the minimum safeguards.

## Metrics and targets

### MDR-M. Metrics in relation to material sustainability matters.

Throughout 2025, the Group has implemented various initiatives to continue adapting to the adverse effects of climate change and the challenges involved in mitigating it. These initiatives are outlined in the 2025 Sustainability Plan, a set of actions that fall within the three-year Sustainability Plan for 2023-2025.

In the latter, the general objective of Social and Environmental Contribution was identified for the three-year period, which develops the environmental part in Eco-efficiency, Circular Economy and developing a climate roadmap towards the decarbonisation of its activity.

In the area of responsible investment, the following stand out:

- 1 The presentation of intermediate carbon footprint reduction targets for 2030 by the SBTi (Science Based Targets initiative).

## 2 Preparation of a climate change transition plan based on the EFRAG guide and the CSRD update.

Due to the legal instability in European sustainability matters and the approval of Royal Decree 214/2025 on the carbon footprint, which requires making the Emissions Reduction Plan for 2030 public, these two lines of action were cancelled by the Board of Directors.

The Group's investment portfolio comprises various investment vehicles. 35% of the portfolio is held in government bonds, 47% in corporate bonds, and 7% in equities. Investment funds account for 5%, and real estate investments represent 6%.

Additionally, the 2025 Sustainability Plan included, within the Governance pillar, an action to improve the alignment of investments by 1 percentage point and their eligibility by 2 percentage points. The result was an improvement of 1.46 percentage points in alignment and 1.45 percentage points in eligibility compared to the previous year.

Finally, in 2025 the Group calculated the estimated social cost of the impacts of its carbon footprint, continuing the practice of previous years.

To carry out the exercise, the International Carbon Price Floor (ICPF) established by the International Monetary Fund in its report "Proposal for an International Carbon Price Floor Among Large Emitters" was taken into account. This document, published in June 2021, estimates a price of \$75 per ton of carbon in high-income countries. In this regard, it was estimated that the carbon footprint of the Línea Directa Group's Scope 1 and 2 emissions in 2025 represents a social impact of \$62,578, 0.35% less than in 2024. For Scope 3 emissions associated with the 2025 investments, the impacts is estimated at up to \$4.5 million.

The social cost in 2024 for Scope 1 and 2 emissions was \$62,800. For Scope 3 emissions associated with investments, the result in 2024 was up to \$3.92 million.

The Group manages 100% of the Group's assets and does not manage third-party assets.

### **MDR-T. Tracking effectiveness of policies and actions through targets.**

Stakeholders do not participate directly in the investment, although they do so indirectly by taking into account the interests of shareholders and investors to align goals.

The 2025 Tier 1 Sustainability Plan approved by the CNR on February 6, 2025, the quantitative objective of maintaining in 2025 the degree of alignment at +/-1% and the degree of eligibility +/-2% in the investment taxonomy is established in the governance axis and involving the finance area as a driving area.

Compliance with the objective will be reviewed annually once the final 2025 taxonomy data is available.

Additionally, Línea Directa will continue the actions carried out in 2025 during 2026:

- Línea Directa will renew its commitment to the PRI initiative in 2026, as the main driver of responsible investment on a global scale.
- Presentation of the Transparency Report, in order to report on the degree of alignment with the Principles for Responsible Investment (PRI).
- Carbon footprint calculation. Línea Directa will continue to update its carbon footprint calculation for scopes 1, 2 and 3 in 2026 with a consolidated scope that includes all subsidiaries of the group with an annual time horizon.

- Review and update of the degree of eligibility and alignment of the investment portfolio with the EU taxonomy.

The continuity and monitoring of these actions will allow us to address the material IROs identified in the area of responsible investment, which are detailed below:

- Contributing to emissions reduction through investment in companies that are committed to the use of renewable energy or projects aimed at reducing their emissions.
- Investing in sectors that contribute to mitigating climate change.
- Make responsible investments, such as real estate assets with good energy certifications, green bonds or blue bonds, and even other investment products that may be considered within Article 8 or 9 of the SFDR.
- Supporting companies that have a clearly environmentally and socially responsible strategy and focus on activities that facilitate the reduction of emissions and the fight against climate change in all its facets.

Monitoring the investment portfolio throughout 2026 will allow for the continuity of the goals defined in the responsible investment policy. In this regard, and as mentioned above, the Group limits exposure to 8% of the total portfolio value to issuers operating in any of the following sectors (an issuer is considered to have exposure to this type of activity if its income from this activity exceeds 15% of its revenue):

- organisations that produce and/or distribute active defense material (weapons, ammunition and explosives when the purpose of use is military) and controversial weaponry (anti-personnel mines, chemical, biological or nuclear weapons, fragmentation bombs, nuclear weapons, among others).
- In response to the decarbonisation goals agreed upon in the Paris Agreement and the recommendations of the Intergovernmental Panel on Climate Change (IPCC), the Línea Directa Group, in its support for the transition to a net-zero emissions economy by 2050, will limit to 15% the proportion of its portfolio exposed to the following activities:
  - The production of electricity, heat, or automotive energy from the combustion of coal (as well as mining and infrastructure), which is the fossil fuel with the greatest impacts on climate change.
  - The exploration, production, processing, transportation, and/or extraction of hydrocarbons (oil and gas), with a special focus on the following: Oil sands, Shale oil and gas, Arctic oil and gas, and Ultra-deepwater oil and gas.

Additionally, the Línea Directa Group commits to the complete divestment of its positions in the aforementioned sectors by 2030, unless the companies carrying out these activities comply with one of the following points:

- Have a decarbonisation plan based on a science-based emissions reduction target (SBTi).
- The share of these activities in their total turnover is less than 15%.
- The importance in Línea Directa 's investment portfolio was less than 8%.
- Other sensitive sectors identified including adult entertainment, gambling and betting, mining, alcohol and tobacco.

# SOCIAL DIMENSION

## Own workforce (ESRS S1)

### Strategy

#### **SBM-3. Material impacts, risks and opportunities and their interaction with strategy and business model.**

Línea Directa Aseguradora, through a Double Materiality analysis conducted throughout 2024 and reviewed in 2025, has identified impacts, risks, and opportunities related to its own personnel in areas such as employee safety, health, and well-being; diversity, equity, and inclusion; and talent management and professional development. These issues are related to and linked with its strategy and business model. Among the strategic lines of Línea Directa's Fifth Sustainability Plan 2023-2025 are diversity, equality, and Human Rights, and talent: well-being and culture. These lines prioritize actions in ESG matters and lead to concrete actions that define the aforementioned Plan, aiming to connect the business strategy with the people strategy, seeking a balance between the two.

During 2025, the new Sustainability Plan 2026-2028 was approved, which defines the Group's lines of action in the next three years, promoting a culture of transformation through talent and boosting the Positive impact on society through initiatives aligned with the activity.

The Group has taken into account the specific characteristics of its own workforce, such as people with functional diversity, in carrying out this exercise, identifying a direct opportunity related to them as a key resource. Specifically, the Línea Directa Customer Service department is dedicated exclusively to managing the needs of the Group's employees.

Regarding the classification of its own personnel, the Group maintains its existing definitions, considering as salaried employees those individuals with a current employment contract with Línea Directa. This definition excludes those with training/internship contracts (e.g., trainees). On the other hand, non-salaried employees include those hired through temporary employment agencies (ETT) and trainees. Both groups may be affected by material impacts arising from the Group's operations, taking into account their contractual relationship and their degree of involvement in the business activities.

All material impacts related to own workforce are positive and affect both salaried and non-salaried workers of own workforce.

Línea Directa implements numerous initiatives to foster Positive impact across its entire workforce, such as Well-being and Health Programs, training, employee benefits and perks, and diversity and inclusion awareness campaigns. Further details on this topic can be found in section S1-4 of this chapter.

In 2025, Línea Directa continues to develop initiatives that foster Positive impact across its entire workforce, such as Well-being and Health Programs, training programs, employee benefits and perks, and diversity and inclusion awareness campaigns. This is discussed in more detail in section S1-4 of this chapter.

As part of its collaboration with its own workforce in the context of the transition to greener and climate-neutral operations, Línea Directa recognizes the importance of preparing its employees for the challenges and opportunities of the green transition and, therefore, focuses its efforts on training and skills development in sustainability. In 2025, the Sustainability and Diversity School was launched internally, and its content will be expanded over the next three years in alignment with the Group's Sixth Sustainability Plan 2026-2028.

Sustainability training for staff increases awareness of how employees can reduce their environmental impacts. The training content includes topics such as good office habits, waste management, and tips for both car use and home use.

On the other hand, in order to consider and anticipate future scenarios, the entity monitors material opportunities and risks related to its own personnel. These are closely linked to the identified impacts. The opportunities identified as material include attracting qualified talent due to the Group's perception as a good employer, and increasing initiatives and measures that promote the integration and inclusion of diverse groups in the workplace, with particular attention to people with functional diversity or those from diverse backgrounds such as race, gender, and age.

The only potential material risk, reassessed in 2025, is the lack of professional development in new market trends and needs. This reflects the Group's reliance on a workforce adapted to the constant changes in the insurance and technology sectors. To mitigate this risk, the Group promotes training and development programs that align employee skills with market demands, thereby enhancing their competitiveness and resilience.

In accordance with Línea Directa business model and the geographical area in which it operates, neither the Group's operations nor those of its value chain are considered to have a significant risk of forced labor or child labor. However, the Group has a Human Rights Policy that defines the principles and commitments that ensure the protection of the rights of workers and individuals. Furthermore, Línea Directa conducts a Due Diligence exercise to identify the impacts and risks that its insurance business may have in its various roles as an insurer, employer, investor, and with its surrounding community. Due to the legal uncertainty in Europe regarding Due Diligence, Línea Directa has maintained its identification of the impacts and risks that its insurance business may have in its various roles as an insurer, employer, investor, and with its surrounding community through 2025.

## Impact, risk and opportunity management

### S1-1. Policies related to own workforce.

The Línea Directa Group has policies that apply to all its employees, including both salaried and non-salaried staff. These policies are publicly available and outline the commitments and responsible practices for managing and addressing material impacts, risks, and opportunities related to its personnel. These public policies, such as those on Talent, Diversity and Inclusion, Gender Equality, Human Rights, Sustainability, and Prevention, Safety, Health, and Well-being, are approved by the Board of Directors and are reviewed periodically to ensure they remain up-to-date and relevant in a dynamic business environment. They also align with the United Nations Sustainable Development Goals (SDGs) and are available to employees through the corporate intranet and to other Stakeholders via the Línea Directa website, thus guaranteeing their accessibility and transparency.

#### Talent Policy

Línea Directa Aseguradora values its people as one of the main drivers of its success. Therefore, its Talent Policy establishes the principles and commitments that guide the attraction, development, and retention of talent, promoting equality, diversity, and respect for Human Rights. This policy, approved by the Línea Directa Board of Directors, applies to all employees of the Group, including both salaried and non-salaried staff.

Línea Directa committed to stable, high-quality employment, promoting a stimulating job market that ensures the sustainability of the business. Its people management model is based on objectivity, transparency, and fairness, ensuring that selection processes exclusively value the merit and abilities of candidates, eliminating any bias or discrimination. Furthermore, the Group fosters the development of its employees through training, evaluation, and internal promotion programs, creating opportunities for professional and personal growth.

Aware of the transformations in the business environment, Línea Directa adapts its talent strategy to the needs of a constantly evolving market. Through a role-based organisational model, it flexibly identifies and manages key competencies, integrating emerging functions and fostering innovation and a digital culture. This approach allows it not only to attract external talent but also to strengthen internal capabilities, ensuring organisational continuity through succession plans for critical positions.

Talent retention is strengthened through a performance management and variable remuneration system, linked to the achievement of strategic goals, and with a transparent remuneration policy aligned with the principles of equality. Likewise, the Group promotes employee engagement through initiatives that reinforce a sense of belonging, close communication, and active listening channels that allow it to assess and respond to their needs and expectations. This commitment extends to the overall well-being of its employees, ensuring a healthy work environment, specific programs to improve their quality of life, and opportunities to participate in corporate volunteering initiatives, for example.

Its management is supported by the People, Communication and Sustainability Department, which establishes the Group's talent plan, monitors its implementation, and ensures consistency with other specific talent policies, procedures, and strategic plans. In addition, cross-functional committees ensure compliance with the principles of this policy.

The following Positive impact, risk, and material opportunity for the entity are associated with the theme of talent:

- **Positive impact:** Employee satisfaction with the development of their skills within the Group, the expansion of their knowledge, and the possibility of internal promotions.
- **Opportunity:** Attracting qualified talent due to the Group's perception as a good employer.
- **Potential risk:** Lack of professional development of workers in emerging market trends/needs.

### **Policies for the promotion of diversity and inclusion, non-discrimination, and equal opportunities.**

The Línea Directa Group establishes its commitment to diversity, inclusion, equal opportunities, non-discrimination, anti-harassment, and respect for Human Rights through a set of policies. These principles are designed to promote an inclusive work environment, ensure equal treatment, and foster respect for individual differences, while strengthening the Group's sustainability and competitiveness. This Policy applies to all Group personnel, whether salaried or self-employed.

The Group reaffirms these principles through national and international commitments, which endorse the organisation's management in this regard. Línea Directa a signatory or member of:

- **Global Compact Spain**, a United Nations initiative that urges companies to align their strategies and operations with the 10 universal principles on Human Rights and labor standards.
- Signatory of the **European Diversity Charter** promoted by the European Commission within the framework of the directives for non-discrimination.
- Signatory of the **Women's Empowerment Principles (WEPs)**, an initiative launched by UN Women and the Global Compact to promote gender equality in business.
- Signatory of the **Luxembourg Declaration** on European promotion of health and safety at work.
- At the sector level, the Company belongs to the **EWI Network**, which promotes the presence of women in management positions in the insurance sector.
- **IBEX Gender Equality**, an index promoted by Bolsas y Mercados Españoles (BME) that measures the presence of women in management positions and on the Board of Directors of Spanish companies.
- **Top Employers**, an international certification that recognizes the Company as one of the best employers in the country. The certifying body analyzes human resource management practices, including those related to equality and diversity.
- **EFR Certificate** of "Family Responsible Company", a seal that recognizes the commitment to advance and provide answers in matters of responsibility and respect for the reconciliation of personal, family and work life, in addition to recognizing the support for equal opportunities and the inclusion of the most disadvantaged in organisations.

The scope of the diversity and inclusion, gender equality, and Human Rights policies extends to all employees, managers, and directors of all companies within the Línea Directa Group, as well as the Línea Directa Foundation. In this context, the Company also promotes its collaborators and other individuals involved in its operations, products, and services to adhere to the provisions of this policy. These policies are approved by the Línea Directa Group's Board of Directors.

## Diversity and Inclusion Policy

Línea Directa Aseguradora Diversity and Inclusion Policy establishes the fundamental principles and commitments that govern the Company's actions regarding diversity and inclusion.

With this comprehensive approach, the Company reflects its commitment to equal opportunities, the elimination of all forms of discrimination (such as race, religion, gender identity, sex, sexual orientation, political affiliation, nationality, language, age, and abilities), and the active promotion of an inclusive environment. For the Línea Directa Group, diversity is a competitive advantage that allows it to adapt to today's diverse and ever-changing society. In this regard, it ensures, among other things, fair processes for **selection, hiring, training, remuneration, and promotion**, based solely on merit, experience, and performance.

The Group also promotes the inclusion of vulnerable groups, facilitating their proper integration into the Company and creating a respectful workplace.

This policy contributes to achieving corporate goals and reflecting the value and richness that diversity brings to the entity's culture and values, as well as providing a framework for action to achieve its fulfillment.

Regarding governance, Línea Directa has established a Diversity and Inclusion technical team responsible for the periodic monitoring and evaluation of indicators related to the commitments made in the policy. The Board of Directors retains ultimate responsibility for the policy, ensuring its implementation and promoting best practices within the Company.

The theme of diversity and inclusion is associated with the following material opportunity for the entity: Increased initiatives and measures that promote the integration and inclusion of diverse groups (such as people with functional diversity) within the staff and governing bodies.

## Gender Equality Policy

In addition to the diversity and inclusion policy, the Línea Directa Group has a **Gender Equality Policy**, which enshrines the development of Labour Relations based on equal opportunities, non-discrimination and respect for diversity.

This policy follows national and international best practices and is in line with the principles of the **European Strategy for Gender Equality 2020-2025**, as well as the various Community directives that develop this principle of equal opportunities between men and women.

The gender equality policy, together with the Equality Plan, establishes the framework for action on equality in relation to Stakeholders, and is based on the Company's values, constituting as a whole a mandatory guide to business conduct.

The principles and lines of action proposed are the following:

- Promote equal opportunities from Senior Management, establishing models that allow attracting and retaining talent regardless of gender.
- To ensure transparency and dissemination of the Equality Policy and documents related to gender equality.
- To foster a culture of flexibility that promotes a balance between work, personal and family life, guaranteeing quality employment regardless of the gender of the employees.

The general goals of the gender equality policy are to adopt concrete measures that allow for ensuring gender equality in the company's own activities and value chain, to bring out talent without gender bias, to facilitate access for the underrepresented gender to senior management and responsibility positions on equal terms, and to pay attention to possible deviations from the pay gap in order to correct them.

The management of the equality principles included in the policy is evaluated and reviewed by the Equality Technical Team, external audits and other certifications and institutions that accredit the Company.

The following material opportunity for the entity is associated with the theme of gender equality: Increased initiatives and measures that promote the integration and inclusion of diverse groups (such as people with functional diversity) within the staff and governing bodies.

Línea Directa also has a **Harassment Protocol** available to all employees, who have received the relevant training on it, so that any employee can request the necessary help in such a situation or report an incident they believe is an attack against them. The **Psychosocial Risk**

**Prevention Protocol (Harassment Protocol)** includes a broader definition of the types of discrimination stipulated by current legislation and expresses it as follows: “Discriminatory treatment is understood as any unfavorable action towards an employee or group of employees based on their marital status, family situation, birth, ethnic origin, age, sex, sexual orientation, gender identity and expression, religious or political beliefs, or any other personal or social condition or circumstance. It refers to attitudes intended to isolate or ridicule a person because of a personal condition or circumstance that distinguishes them from others.”

The Group has a specific procedure for handling these complaints, which also improves upon the established legal deadlines, accelerating the processes to provide greater guarantees of rapid resolution for the affected employees.

The Group has a **Diversity Advisory Committee**, which aims to promote internal initiatives and awareness campaigns among staff. This committee launches **awareness-raising campaigns** on **diversity, equality, and Human Rights**.

In this regard, Línea Directa has a specific inclusion program for people with functional diversity, **"Sin límites"** (Without limits), and another program that covers the families of employees, **"Plan tú sumas"** (You add up plan), which promote inclusion and the emergence of disability in the workplace, as well as offering the necessary help for any procedures that may be required by specific personnel of the organisation.

## Human Rights Policy and commitments

Línea Directa Aseguradora is part of the **Spanish Network of the United Nations Global Compact** and is committed to incorporating the UN Guiding Principles on Business and Human Rights into its operations. To this end, the Group has a Human Rights Policy approved by its Board of Directors and applicable to all Group subsidiaries.

In this matter, it undertakes to respect internationally recognized Human Rights enshrined in the UN International Bill of Human Rights, the International Labour Organisation (ILO) Declaration, as well as its fundamental conventions relating to fundamental principles and rights at work (such as freedom of association and freedom of trade union, and the effective recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; and the elimination of discrimination in respect of employment and occupation), the OECD Guidelines for Multinational Enterprises and the European Convention on Human Rights.

The Policy aims to guide the protection and respect of these rights, preventing their violation and reflecting the Group's commitment to international, local, and industry standards, such as the United Nations Principles for Responsible Investment and Sustainable Insurance. It also describes how this protection is implemented in its operations, establishing principles and guidelines that allow for the identification, prevention, mitigation, and remediation of potential negative impacts. The Policy further outlines Línea Directa's commitments in its operations as an insurer, to its employees as an employer, to its suppliers and partners as a business partner, and as an investor.

In its role as an employer, the Group is committed to upholding the Human Rights of its employees and promoting the principles of fair and favorable working conditions and non-discrimination. The Human Rights Policy states that Línea Directa commitments and people management strategy, as well as its talent selection and development policies, are based on respect for diversity, equal opportunities, meritocracy, and non-discrimination.

For its supply chain relationships, the Group primarily uses domestic suppliers, which allows for greater knowledge and control over their Human Rights practices and a commitment to

local development. Furthermore, as part of the supplier approval process, suppliers must accept the Supplier Code of Conduct, which includes several sections on respect for Human Rights and labor laws.

The Group has an ethics channel available, through which, confidentially or anonymously, and safe from reprisals, its own workforce and any stakeholder group can report a possible breach of the commitments set out in the Human Rights policy.

During 2023, Línea Directa conducted its first online due diligence exercise in accordance with ESG impacts management practices and in response to legal requirements. This process considered international frameworks, most of which are also included in the Group's Human Rights Policy.

Línea Directa incorporates in its Human Rights Policy, as well as in its Due Diligence process, the international principles in the fight against child labor and human trafficking, forced labor, even though they are not applicable to the activity carried out by the insurer in its scope of action.

The Due Diligence process includes a procedure for repairing and/or mitigating the impacts that the company's activities may have on the Human Rights of both its own workforce and its Stakeholders. This procedure includes identifying potential Human Rights violations, classified according to the commitments and principles adopted by the Línea Directa Group and outlined in its current **Human Rights Policy**. The commitments undertaken by Línea Directa in its Policy cover five dimensions of the Group: employer, insurer, investor, collaborator and partner, and its relationship with the surrounding community. The identification of risk events is accompanied by the delimitation of negative impacts, both actual and potential, and defines the criteria for carrying out an assessment, prioritization, and management of these impacts.

Regarding the governance and monitoring model for the Human Rights Policy, the Board of Directors is responsible for guiding, overseeing, and monitoring the policy, strategy, and results related to Human Rights. The Sustainability and Reputation Committee monitors and tracks this matter and is responsible for defining or modifying the action plan and monitoring its goals.

## **Ethics Channel Policy**

Línea Directa has an Ethics Channel Policy, approved by the Board of Directors, to regulate the channels and designated personnel for managing the Ethics Channel and any complaints received through it, as well as the procedures to be followed. The Ethics Channel Policy applies to all whistleblowers, regardless of their stakeholder group.

The objective is to allow anyone to report, with due guarantees, any irregularity detected in compliance with the Code of Ethics, or any other breach of current legal regulations, as well as to raise queries about its application.

The general principles of action it establishes are the following:

- Confidentiality of the identity of the informant and of any third party mentioned in the communication, as well as the processing of the information and its investigation.
- Prohibition of retaliation.
- Respect for the principle of presumption of innocence and the right to defense of the affected parties
- Independence, impartiality and absence of conflicts of interest in management.

- Effective processing of communications.
- Accessibility.

The policy also establishes the functions of the Ethics Manager, a position appointed by the Board of Directors. This individual is responsible for managing the entity's Internal Information System and is therefore in charge of receiving and responding to all questions and concerns that may arise from the application of the Code of Ethics, as well as handling, analyzing, evaluating, and resolving the various reports received regarding potential regulatory breaches or inappropriate conduct.

The policy develops and establishes the following procedures:

- Communications management procedure
- Specific procedure regarding irregularities of potential significance, especially of a financial and accounting nature
- Specific procedure regarding the prevention of situations of workplace and sexual harassment
- Specific procedure regarding the prevention of criminal offenses

Furthermore, it establishes guarantees such as no retaliation against the informant.

This policy was reviewed and updated in 2025 with formal adjustments, and is available to Stakeholders on both the intranet and the corporate website.

## Sustainability Policy

The Línea Directa Group's Sustainability Policy establishes the framework for integrating environmental, social, and governance (ESG) criteria into its strategy and daily operations. In line with its commitment to sustainability, this policy is aligned with the Group's internal policies and regulations.

The Sustainability Policy's main objective is to consolidate a responsible management model that contributes to sustainable development and the creation of shared value. The principles set forth in this document apply to all employees, managers, and directors of all companies within the Línea Directa Group, as well as to the Línea Directa Foundation, in accordance with applicable regulations. In this context, the Group will also promote its collaborators and other Stakeholders involved in its operations, products, and services to adhere to the provisions of this Policy. Furthermore, the Group will strive to extend its commitments throughout its value chain to promote sustainability among all Stakeholders.

The Policy structures its commitments across various Stakeholders and key areas:

- **Customers and policyholders:** Innovation in products and services, transparent information, quality service and data protection.
- **Employees:** Promotes a culture of respect, equal opportunities, and diversity. Committed to ensuring quality, stable employment, facilitating professional development through talent management processes such as attraction, retention, and promotion. Promotes work-life balance through flexible policies and digital disconnection options, in addition to preventing psychosocial risks and workplace harassment with specific protocols. Furthermore, prioritizes employee well-being and

safety, fostering healthy work environments and promoting social responsibility within the organisation.

- **Suppliers:** Relationship based on ethical and sustainable principles.
- **Shareholders:** Transparency and long-term value creation.
- **Environment:** Promotes a culture of respect, equal opportunities, and diversity. It is committed to ensuring quality, stable employment, facilitating professional development through talent management processes such as attraction, retention, and promotion. It fosters work-life balance through flexible policies and digital disconnection, in addition to preventing psychosocial risks and workplace harassment with specific protocols. Furthermore, it prioritizes well-being and workplace safety, promoting healthy environments and fostering social responsibility within the organisation.
- **Society:** Promoting social initiatives and commitment to the community.
- **Good governance:** Upholding regulatory compliance, business ethics, and transparency.
- **Responsible investment:** Integrating ESG criteria into your financial decisions.

The Board of Directors approves the Línea Directa Group's Sustainability Policy and bears ultimate responsibility for its oversight. This Policy is developed and complemented by strategic sustainability plans and the various internal policies and procedures approved within the Group. The Línea Directa Group's Sustainability Committee, through the Sustainability Department, is responsible for reporting at least annually to the Appointments, Remuneration and Corporate Governance Committee on the actions derived from the Sustainability Plan and compliance with ESG indicators.

The policy, by its very nature, encompasses and refers to all material impacts, risks, and opportunities related to the company's own personnel. These IROs, like the policy itself, cover the following topics: employee job security, well-being and work-life balance, diversity, equity and inclusion, talent attraction and retention, and training and professional development.

### **Prevention, Safety, Health and Well-being Policy.**

For Línea Directa, actions aimed at protecting health, preventing illness, and promoting well-being are a fundamental part of its commitment as a company responsible to society and its employees. Therefore, one of the main goals in human resources management at the Línea Directa Group is to ensure the safety and health of its employees. In this regard, Línea Directa has been a signatory to the Luxembourg Declaration, promoted by the European Network for Workplace Health Promotion since 2017, committing to accept and implement the basic goals of workplace health promotion and to align its strategies with the principles of this declaration.

In addition, Línea Directa has a Well-being Program aligned with the principles of the International Labour Organisation (ILO) and which follows the recommendations of the European Union (EU) on Occupational Health and Safety.

In this regard, the Group has a Prevention, Safety, Health, and Well-being Policy, as well as a workplace accident prevention management system, which reflects its firm commitment to this area and establishes the framework applicable to all employees, managers, and directors of the companies that make up the entity. Línea Directa's commitment in this area stems from

the Group's Management and Governing Bodies, reflecting an active involvement in the continuous improvement of working conditions and employee Well-being.

This policy is structured in compliance with legal requirements and based on the recognition of international good practices established in international guidelines and standards, including the **International Labour organisation** Convention 155 on safety and health of 1981, and the Luxembourg Declaration.

During 2025, the commitments of the Occupational Risk Prevention and Well-being Policy were reaffirmed. These include the periodic review of working conditions, the replacement of hazardous elements with safe alternatives, the identification of internal and external factors that may affect employee health and safety, and the guarantee of adequate medical monitoring that respects privacy. The policy also promotes adapting working conditions to the individual needs of each employee, ongoing staff training and awareness, the promotion of physical and emotional Well-being, and the organisation of emergency response teams with annual drills. Risk and hazard assessment in the workplace is considered crucial for shaping risk control activities and managing the prevention system.

Furthermore, the policy sets several goals, including establishing quantitative targets to improve workplace safety, addressing indicators such as incidence, frequency, and severity rates, as well as the number and duration of sick leave. It also includes goals aimed at ensuring employee health through medical check-ups and Well-being campaigns, implementing training in occupational risk prevention, developing emergency plans, guaranteeing employee participation and consultation in preventive management, and establishing the Coordination of Business Activities (CAE) for occupational risk prevention with suppliers operating at Línea Directa 's work centers. These suppliers, in turn, must comply with the standards established by the Group.

The principles set out in the policy apply to all employees, managers and administrators of all companies that make up the entity.

The Group has the necessary resources to provide the company with the support and advice required for adopting the appropriate preventive measures. The Group handles, using its own resources, the preventive specialties of Occupational Safety, Industrial Hygiene, and Ergonomics and Applied Psychosociology, as stipulated in the specific regulations for Occupational Risk Prevention. These specialties are carried out by a senior technician who serves as the Occupational Risk Prevention Manager for Línea Directa . The preventive specialty of Health Surveillance is contracted out to an external prevention service. The Group's own prevention service is responsible for maintaining adequate coordination with the contracted external prevention service and with any external specialist consultants who may be hired to carry out specific preventive activities.

To ensure compliance with and monitoring of this policy, Línea Directa has its own Prevention Service, which is responsible for prioritizing and developing action plans, implementing preventive measures, and regularly monitoring the defined goals. This service also submits proposals to Management to further the achievement of the established goals.

The approval of the prevention, safety, health and well-being policy is the responsibility of the Board of Directors and the company's own Occupational Risk Prevention service will review it periodically.

The following positive material impacts of the entity is associated with the themes of prevention, safety, health and well-being, as well as digital disconnection: Improvement of employee well-being due to the promotion of work-life balance, digital disconnection, social benefits and healthy habits.

Línea Directa has additional internal policies available to employees, such as the Digital Disconnection Policy and the Remuneration Policy, which are also connected to the Group's material Positive impact.

### **Digital Disconnection Guidelines.**

Línea Directa Aseguradora, as well as its subsidiary Línea Directa Asistencia, have their own Digital Disconnection guidelines and procedures. The scope and application of these are limited to the employees of each company within the group, both salaried and self-employed, while they are performing their duties. CAR (Centro Avanzado de Reparaciones) is a special case. Due to its sector, CAR does not have its own procedures, as human resources management and personnel management guidelines are established at the parent company through a dedicated HR business partner. This individual then communicates these principles to the management of the Madrid and Barcelona workshops for implementation and dissemination to all staff.

Línea Directa, as a social entity and Family Responsible Company (EFR), has this internal digital disconnection policy with the aim of maximizing the work-life balance of employees.

This Policy expressly recognizes the right of employees not to respond to company communications outside of working hours, except in cases of justified urgency, and team leaders are advised to avoid them. The new technological systems implemented by the Company contain warnings about the inappropriateness of sending communications outside of working hours. The Group also strives to harmonize employee schedules to facilitate work-life balance, thanks in part to new collaborative work methods that enable real-time collaboration without requiring physical presence.

In order to reinforce good practices in this area, Línea Directa continues to promote the responsible use and organisation of working time among its employees and managers through training or awareness-raising to Stakeholders through tools such as @prende, LinkedIn Learning, among others.

The person responsible for and author of this internal policy is the Labour Relations team of Línea Directa.

### **Remuneration Policy.**

The Group has a Remuneration Policy whose main objective is to align employee remuneration with the Group's interests by promoting its values and corporate culture. In this regard, the established remuneration system must be geared towards promoting the Entity's long-term profitability and sustainability, rewarding behaviors and attitudes consistent with its culture and values, and incorporating the necessary safeguards to prevent excessive risk-taking and the rewarding of unfavorable results.

Furthermore, it outlines the general principles that guide its application, aiming to ensure that remuneration contributes to long-term growth and value creation for Stakeholders. These principles include fairness, equity and external competitiveness, sustainability, flexibility, equality and diversity, and transparency with employees regarding their remuneration, among others.

The Board of Directors is responsible for approving the Policy, and the company has a dedicated Appointments, Remuneration, and Corporate Governance Committee, which also has jurisdiction in this area. The Committee reports annually to the Board on the remuneration

of Línea Directa 's management team and monitors compliance. A Monitoring Committee, the People, Communications, and Sustainability Department, the Corporate Risk Department, and the General Secretariat are also involved in remuneration matters.

Employees have universal access to the Company's Remuneration Policy, published on the "Employee Portal," where they can find all the information regarding Línea Directa remuneration and benefits strategy. Likewise, the sectoral Collective Bargaining Agreement governing Línea Directa , which regulates a significant part of the fixed remuneration structure, is also a public document and is available to all employees.

The following material Positive impact on the entity is associated with the topic of remuneration: Increased job security for employees due to fair working conditions, competitive salaries and the indefinite contracting model followed by the Company.

### **Notable updates to corporate policies.**

Following the reviews carried out in 2024, during the 2025 period under study, no significant modifications have been made to the social policies presented.

Given the importance of corporate policies, the Sustainability Plan 2026-2028, promoted by Corporate Governance, has included as a key action the raising of awareness of internal policies and regulations, with the aim of increasing the visibility of policies on the corporate intranet, ensuring communication about changes to existing policies and new policies should they occur.

## **S1-2. Processes for engaging with own workers and workers' representatives about impacts.**

### **Engagement with employees and workers' representatives.**

Línea Directa Aseguradora has established various mechanisms to collaborate with its employees and workers' representatives, ensuring open and effective communication regarding the positive, negative, real and potential impacts that may affect them, thus considering them in the decisions aimed at managing these issues.

The Group is among the companies certified by the Más Familia Foundation (EFR) through its Ed.5 1001 standard, as one of the Spanish companies with a people management model based on active listening and work-life balance, which complies with the parameters established by said standard.

### **Internal and External Communication Channels.**

The Group has specific communication channels for its employees to communicate with third parties outside the Company, such as the **Más Familia Foundation**. These channels allow employees to communicate not only with representatives of this management model (listening) within the Company, but also with Foundation staff regarding any matter that constitutes a breach of this management model. All employees have access to these channels, which ensure confidentiality and are open at all times through the Employee Portal. Specifically, there are two channels associated with the **EFR Foundation** and available to employees: the first is directed to the EFR manager, and the second to the Foundation itself. The management of communications through these channels is governed by Standard 1001 of the work-life balance management model. These channels are also audited by a third-party auditor at the intervals established by the aforementioned standard.

In another vein, and as an example, one of the mandatory **EFR measures** is communicating job security to employees. This means the Company must publish its permanent hiring rates as evidence of its commitment to stable employment, one of the identified material Positive impact. All information related to the EFR management model to which Línea Directa adheres is publicly available to employees through the "**Employee Portal**."

In parallel, and as part of the dialogue process regarding these impacts, the company has a public recruitment procedure for Línea Directa employees through the "Employee Portal", which includes the following principles that govern the organisation's recruitment policy:

- **Equality and non-discrimination:** The Hiring Policy is aligned with the Company's commitment to respect equal opportunities and promote non-discrimination on the grounds of race, color, sex, marital status, ideology, political opinions, nationality, religion or any other personal, physical or social condition.
- **Confidentiality:** It is guaranteed that the information contained in the employment contracts, and provided by the candidates, will only be accessible to employees authorized by the People, Communication and Sustainability Area expressly for this purpose for the performance of their job.
- **Inclusion:** the hiring of people with functional diversity, in situations or at risk of social exclusion, is promoted, thus favoring socially responsible employment.
- **Legality:** throughout the entire hiring process, current regulations will be scrupulously respected, guaranteeing that the contract will be signed by the employees and that they will be registered with Social Security on the same day of their incorporation into the Company.
- **Talent Development:** the most appropriate contractual arrangements offered by law will be used to promote the attraction and retention of talent.

Furthermore, as discussed in section S1-1, the company has a Talent Policy, approved by the Board of Directors and made public to all employees, which includes the following commitments:

To promote stable, quality employment with a stimulating and challenging job offer that guarantees the Company's sustainability and fosters job security. This will impact Sustainable Development Goal 8, related to sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all at Línea Directa .

### **Periodic collaboration mechanisms.**

Línea Directa uses various relationship and communication tools with its own workforce, including the biannual "**Employee Experience**" surveys, the annual and area-specific opinion polls, and the triennial survey associated with the EFR management model called "**The Employee Voice**".

The Group maintains communication with employees regarding the various issues that affect them, such as fair working conditions and adequate wages, which are framed within the various climate or employee experience surveys and periodic opinion polls, where all staff have the opportunity to give their perspective on this matter.

The "Employee Voice" survey aims to gather employee feedback on the measures the Company offers, including the aforementioned "job security" through the promotion of permanent contracts. This information allows both an external audit service authorized by the

foundation and the Company's People Department to understand employee perceptions of this and other aspects. The external audit service (in this case, DNV) takes this survey into account in its certification report. The survey includes a study of both employee satisfaction and the effectiveness of the measures, in which employees participate directly. The survey process is also governed by the EFR standard designed for this purpose.

All employees are invited to participate in and complete the various surveys, the results of which the Group shares through email campaigns and focus groups. Employee working groups, in the case of the Employee Experience and Voice survey, are created to share results, gather opinions and ideas on the measures the Company has implemented for employees. These measures will be integrated into the Group's strategy to improve areas identified as having the greatest room for improvement, and to track the progress made in this regard. This direct collaboration with employees is of particular importance to Línea Directa. The conclusions, as well as the measures adopted, are communicated by department heads to all Group employees.

In the case of the **Employee Experience Survey**, conducted in 2025, the process begins with the CEO announcing the survey's launch to all employees. The Group has the advice and collaboration of an external provider for this study, which, in turn, guarantees the absolute confidentiality and anonymity of the data. Once the results have been collected and analyzed, the CEO again communicates the overall results to the staff, and the People, Communications, and Sustainability department shares the results for each area with each Director so they can share them with their teams.

Among the results of the survey conducted in 2025, the increase of 2 percentage points in participation compared to the previous edition in 2023 stands out.

The main employee experience indicators measured (trust, engagement, pride in belonging, NPS, and eNSS) have increased compared to the previous survey in 2023. This overall improvement demonstrates confidence in Línea Directa's future. Furthermore, employees are demonstrating their commitment, pride, and their recommendation of the company as a great place to work.

The People, Communication, and Sustainability Department promotes, promotes, and coordinates the development of action plans by each department to address the most significant issues. The progress and results of these action plans are shared with the departments.

On the other hand, information sessions are held with the CEO to inform employees about the Group's results. There is always an open question-and-answer session with the CEO. These meetings take place quarterly. In addition to the annual Kick-off meeting, held at the beginning of the year, where the Management team presents the Plan for the year, the mid-year meeting is held in July. At this meeting, middle managers and those with responsibilities present the progress of the year's strategic proposals to nearly 300 people. A follow-up survey, conducted by the People Department, is then carried out after each meeting to assess its effectiveness. This data is analyzed internally for continuous improvement.

Those responsible for making this collaboration happen are the People, Communication and Sustainability Departments through their lines of action and the people responsible for these, who serve as a bridge connecting with the areas and different departments so that the results reach the whole Group.

## **Employee Channel, Ethics Channel and personalised support.**

Additionally, Línea Directa employees have access to an "Employee Channel," a universally accessible and permanently open system through which they can submit any concerns, questions, or requests at any time. This channel is managed by the People Support team, dedicated exclusively to employee information and care. Employees can submit any relevant issue to this team for immediate attention or referral to the appropriate channels. The channel allows for responses to employee inquiries within 24-48 hours, unless the topic requires further investigation. This channel is included in the risk controls implemented by the Group's Corporate Risk area to evaluate its operation and effectiveness.

On the other hand, employees also have access to LiDiA (the name of the artificial intelligence tool that supports the People Department) associated with the Employee Channel, which reinforces the human management of this medium.

Additionally, it is important to highlight that all Company employees have received training on the Code of Ethics, which, among other things, outlines the principles that govern the relationship between the organisation and its staff. Furthermore, Línea Directa has an Ethics Channel through which, with the necessary safeguards, any employee can report breaches of the Code of Ethics, as well as any violations of its principles or other legal precepts.

In order to guarantee the proper functioning of the Ethics Channel, it has its own Ethics Channel Policy, approved by the Board of Directors, which regulates the channels and people designated for the management of the Channel and the complaints that may occur in it, as well as the procedure to be followed in them.

All employees have access to both the Channel and the Ethics Channel policy through the Employee Portal for that group, and the website for all Stakeholders.

## **Significance of corporate policies and the Diversity Advisory Committee.**

Regarding the potential impacts the organisation may have on Human Rights or those that may occur with vulnerable personnel, Línea Directa, in addition to the tools described above, has specific corporate policies that ensure the Group's activities do not negatively impact its staff or particularly vulnerable individuals. Therefore, employees have access to the Human Rights Policy, Gender Equality Policy, and Diversity and Inclusion Policy, which outline the principles on which Línea Directa bases its relationship with employees in each of these areas and the mechanisms available to them should any breach occur.

It is also worth mentioning that Línea Directa created a Diversity Advisory Committee in 2023, which began its work in 2024 and continued into 2025. This committee aims to be a forum for employees to foster dialogue with the Group regarding sensitivities and potential impacts that the organisation's activities may have on vulnerable groups, or in the event of any non-compliance. The Committee is composed of members of the Management Committee and reports its activities to the Sustainability Committee.

In addition to the **Diversity Advisory Committee**, Línea Directa has a plan to support people with functional diversity within the organisation called "Sin Límites" (Without Limits), which includes a designated person to guide and support employees who need it.

In this regard, and more broadly to other groups, the People area includes the People Support department, dedicated to managing all the needs of the Group's employees. This allows them to address various issues that arise in their daily work and affect them. This department ensures their well-being and seeks solutions, always respecting the principles and commitments of the corporate policies on Diversity and Inclusion, Gender Equality, and Human Rights.

## **Trade Union representation and collective bargaining agreements.**

As regards the workers' representatives, the Group has different trade union sections that exercise their corresponding rights in accordance with the Organic Law of Trade Union Freedom and that have notice boards and meeting rooms in the different buildings of the organisation, which allow them to be in contact with those employees who wish to do so.

Furthermore, 100% of the employees of the Línea Directa Group are covered by the collective agreement that applies in each of the work centers of the companies that comprise it:

- In Línea Directa Aseguradora, the Insurance and Reinsurance Agreement.
- In Línea Directa Asistencia, the Collective Agreement of Offices.
- In CAR Barcelona, the Barcelona Metalworkers' Agreement.
- In CAR Madrid: the Madrid Metalworkers' Agreement.

Collaboration with the major unions, as well as with their local branches, is not based on a pre-established schedule, since communication is handled directly with employees. The People manager and the labour relations coordinator are responsible for communicating with the unions within Línea Directa. These communications occur when either party has a relevant issue to address.

As has been explained throughout the chapter, for the Group, information and consultation with employees are paramount in order to be aware of the employees' perception of their working conditions and to be able to implement the corresponding action plans.

## **Collaboration with our own workforce in the context of an environmentally fair transition.**

Within the framework of collaboration with its own workforce and representatives in the context of the transition towards greener and climate-neutral operations, Línea Directa recognizes the importance of preparing its employees for the challenges and opportunities of the ecological transition and, therefore, focuses its efforts on:

Training and skills development:

Through its Talent Policy, Línea Directa promotes the updating and development of its human team, linking **training** to the **strategic needs** of the organisation.

Specifically:

- **Talent needs identification:** The Group establishes business plans, which are linked to people plans to address the Group's strategic needs. Mechanisms are established to identify skills and knowledge needs, allowing for the alignment of employee development with the organisation's requirements. Additionally, needs for external talent acquisition are identified.
- **Internal talent promotion and development:** development and training plans are established, linked to the strategic needs of the Group, which set the priority lines of action in the area of internal talent management.

Regarding the **commitment to training in environmental issues:**

The Environmental Management and Climate Change Policy also highlights the entity's commitment to environmental protection and mentions the training of its employees in environmental matters as a key aspect.

In this regard, Línea Directa committed to following the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). Assessing these risks is part of defining the company's business strategy, taking into account the development of new products and services. This assessment encompasses both one-off risks caused by weather events and transition risks arising from the migration to a low-carbon economy, such as regulatory risks.

Given Línea Directa 's business model, no significant impacts are anticipated related to restructuring, job losses, or complex professional development or retraining processes. This transition does not imply any structural changes in Línea Directa workforce.

### **S1-3. Processes to remediate negative impacts and channels for own workers to raise concerns.**

Línea Directa has not identified any material negative impacts related to its own workforce. Nevertheless, as mentioned in the previous section, Línea Directa has various channels available for its staff to express their concerns, enabling the Group to provide effective solutions to employees in the event of any impacts.

The primary interaction mechanism is the Employee Channel, a tool integrated into the People management platform and accessible to all employees. Through this channel, employees can submit any type of inquiry, complaint, or request, which are promptly addressed by the People Support team. This team, dedicated exclusively to meeting employee needs, adheres to confidentiality principles and guarantees a response within 24 to 48 hours. Furthermore, access to this channel is clearly visible and explained on the Employee Portal, making it intuitive to use.

The People Support Team is responsible for resolving employee-related issues concerning their day-to-day work. If they are unable to resolve the issue themselves, they refer it to the department best equipped to mitigate the risk or impacts. Depending on the severity of the situation, the Ethics Manager or the Protocol Office may also become involved.

Similarly, EFR's external channels are open, through which employees can express complaints, suggestions or situations of violation of measures relating to work-life balance or the Ethics Channel.

Other important internal communication channels within the Group are climate surveys, as well as opinion polls, which, although they have a marked periodicity, also allow for a dialogue between the Group and its employees.

### **Complaint management mechanisms: Ethics Channel and Harassment Protocol.**

Línea Directa has implemented an Ethics Channel that allows employees to report breaches of the Code of Ethics, legal violations, or any other risky situation within the company. This hotline is designed to guarantee the anonymity and confidentiality of whistleblowers, promoting a safe environment where employees can express their concerns without fear of retaliation. This commitment to protecting whistleblowers' rights is supported by the Code of Ethics itself and the Ethics Channel Policy, which applies to all companies within the Línea Directa Group, as well as the Línea Directa Foundation, in accordance with applicable regulations.

Due to the importance of the Code of Ethics and its corresponding channel for Línea Directa , all employees of the Group receive training on the Code of Ethics at the time of their incorporation, which is reinforced periodically with various training and dissemination actions.

All communications received through this channel are managed by the Ethics Officer, who is responsible for analyzing, evaluating, and resolving the complaints filed. Annually, the Ethics Officer prepares a report on the level of compliance with the Code of Ethics and the communications received through the Ethics Channel, submitting any recommendations deemed appropriate to the Board of Directors. Furthermore, the Ethics Officer is responsible for proposing action plans when risks arising from non-compliance are detected. The information gathered in this process is handled with the utmost confidentiality, ensuring that both the identity of the complainant and the details of the case remain protected at all times.

The Ethics Channel is accessible both through the corporate intranet and the company website, making it easy for employees to use.

Additionally, Línea Directa has a Harassment Protocol designed to prevent and address situations of workplace harassment, sexual harassment, harassment based on sex, or any other form of discriminatory treatment. This protocol provides a clear framework for reporting and resolving these situations, reinforcing the organisation's commitment to a safe and respectful work environment. Employees can access the protocol through the Employee Portal, where they can consult it and activate the reporting channel. The procedure and its management are defined within the protocol itself. Its effectiveness is subject to appropriate controls by Línea Directa 's Corporate Risk department.

### **Monitoring and assessing channel knowledge and effectiveness.**

The proposed channels are widely used annually by Línea Directa employees, who rely on the entity to resolve the concerns and needs that arise.

Through its Employee Experience survey, the Group poses various questions that reveal the level of trust employees have in the organisation and its structures, particularly regarding the need to raise or have raised issues of varying degrees of importance, such as those discussed in this section. This proactive approach allows the organisation to identify areas for improvement and ensure that communication and redress channels remain effective and accessible to all employees.

### **S1-4. Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce and effectiveness of those actions.**

The proposed channels are widely used annually by Línea Directa employees, who rely on the entity to resolve the concerns and needs that arise.

Línea Directa establishes a series of policies, programs, plans, and other initiatives that address impacts, mitigate potential future risks, and capitalize on opportunities related to its own workforce. Línea Directa has an objective that measures the effectiveness of actions related to its employee well-being program, which is discussed later in this section. It does not evaluate the effectiveness of the other actions described through goals.

The Group has a robust internal regulatory framework. The most relevant corporate policies, approved by the Board of Directors, are fundamental to fulfilling the commitments made in these areas. Key policies that influence the management of impacts, risks, and opportunities related to personnel include:

- Talent Policy

- Diversity and Inclusion Policy
- Gender Equality Policy
- Human Rights Policy and Due Diligence Procedure
- Health, Prevention and Well-being Policy
- Remuneration Policy
- Internal recruitment procedure

Based on these policies, the Group establishes its annual goals, which originate from the CEO and filter down to the entire organisation, and which also include the main actions to be carried out throughout the year.

In parallel with the regularity of each program, variable remuneration programs linked to goals also contribute, allowing the management of each area, and specifically the People Department, to focus their work on mitigating risks and negative impacts, fostering positive ones, and capitalizing on opportunities. This aligns the people strategy with the business strategy.

Regarding risk management, Línea Directa has an Operational Risk Policy that establishes the levels of control over the group companies' operations from an internal perspective, analyzing, among other things, risks related to its workforce. The Operational Risk Policy establishes a monitoring and reporting system, the results of which are reported quarterly to the Audit and Compliance Committee.

Material risks are documented in the Risk Map. The Group's Internal Audit also focuses on controlling, among other aspects, these processes and actions related to material hazards affecting the workforce.

The Company also relies on certifications and accreditations that involve third-party audits and provide insight into its human resource management practices. Examples of this approach include the EFR and Top Employers certifications, among others, which have been presented and described in previous sections. In this regard, the Company has established Assurance Procedures that, for example, review and analyze the management of these two certifications, specifically as they relate to human resource management.

The following outlines the various measures implemented to enhance the identified material Positive impact, mitigate potential material risks, and capitalize on material opportunities. No material negative impacts were identified in fiscal year 2024, nor in the 2025 reassessment; therefore, no related actions were taken to provide or enable remediation of any such impacts.

### **Job security.**

One of the Company's main actions regarding the job security of its employees, which has a Positive impact on the organisation, is the evaluation of people management practices through accredited third-party audits:

- EFR people management model, with quality measures in employment.
- Assessment of compliance with good employer practices through the Top Employers Institute.

In both cases, management is handled by the People Care Department. Both exercises are carried out annually, and the results are reported to the Steering Committee through the People and Communication Department. From each of the two models implemented, findings are extracted that allow for the implementation of improvements and the mitigation of potential risks.

The **main actions** carried out in 2025 are outlined below as a continuation of the previous year:

- Call for applications for **flexible work schedules** for telephone support staff, offering flexible hours and increased teleworking days. These are one-off actions within the fiscal year. Their effectiveness is measured by whether or not they meet expectations or projections regarding the number of registered applicants.
- An **expanded and flexible holiday program** is available to all employees. This is a permanent measure. Its evaluation and effectiveness are measured through the previously mentioned "Voice of the Employee" survey.
- **Total Remuneration Program**: a permanent portal where employees can view all aspects of their remuneration, including non-monetary benefits, thus providing a clear picture of each employee's individual remuneration package. Through this program and the Remuneration Policy, competitive salaries are ensured through various components of Total Remuneration, such as fixed salary, variable remuneration linked to goals, and benefits in kind, life and accident insurance, as well as various social benefits and advantages for being a Línea Directa employee, such as a flexible remuneration program and discounts on all Group products. This is a dynamic tool that is regularly updated with relevant information. Its effectiveness is also evaluated through the employee feedback survey ("The Employee Voice").
- The company primarily uses **permanent contracts**, with a variety of **full-time** and **part-time** contracts. This practice is monitored by the Risk Department and the People Department. It is also audited as part of the external EFR audit.
- **Discounts** on **leasing** programs and **insurance** policies. These are permanent employee benefit programs. Their effectiveness and satisfaction, like the rest, are measured in the same way.
- Employee **share purchase plan** with discount. At least one program is launched per year, and its impacts on employees is evaluated in the same performance survey.

Additionally, in 2025 Línea Directa has enhanced the following benefits which, with a Positive impact, aim to improve the lives of employees in their day-to-day work at the Company.

- **Flexible work arrangements** (Flexiwork): Under this arrangement, all company employees have six flexible work days per month, working from home. This arrangement is publicly available to all staff and accessible through the Employee Portal. Employees also have access to digital tools that allow them to manage these work-from-home days in conjunction with their manager, thus maintaining organisational harmony within the work teams.

Furthermore, for those employees with documented work-life balance needs, the Company, after assessing these needs, authorizes extensions of flexible working days (monthly/annually) to facilitate these needs. By 2025, 100% of the workforce will benefit from this measure.

- **Paid leave not covered by the applicable collective bargaining agreement:** Línea Directa offers its employees additional leave that allows them to take paid time off to attend to various family-related matters. These include:
  - Bank of hours to care for dependent relatives (ascendants or descendants).
  - Leave for accompanying family members during chemotherapy or radiotherapy sessions. (6 days per year, which can be taken in half-day increments).
  - License to accompany first-degree relatives to diagnostic tests with sedation that require the patient to be accompanied.
  - Possibility of requesting shift changes or recovery time, with prior authorization from the manager, to attend to personal matters of special relevance to the employee.
  - Flexible and extended holidays: Línea Directa, in its commitment to work-life balance and improving employee well-being, offers extended holiday plans for its employees, as well as flexibility in how they take them:
    - **Increased holiday plans** for back office (1 day) and front office (3 days) given the specificity of their work in customer service.
    - **Flexible holidays:** Company employees can request holiday at any time of year, subject only to the availability of holiday days established by the organisation to maintain service levels. However, all company employees are entitled to holiday periods of at least 11 days during the summer months, upon request.
  - **Leave and benefits related to maternity/paternity and breastfeeding:** After the 17 weeks of maternity leave have ended, the company allows breastfeeding leave (paid by the company) to be taken in three ways:
    - **Entry and exit half an hour** later and earlier respectively until the baby turns 9 months old. This time can be accumulated into one hour in one of the two periods with the same frequency.
    - **Accumulation of breastfeeding** leave in working days to be enjoyed until the baby turns 9 months old.
    - **The breastfeeding leave can be split**, allowing for 10 days of accumulated leave at the end of maternity leave and reserving 5 days to address questions related to the baby that require the employee's presence. These days can be taken during the year following the end of maternity leave.
    - **Maternity/Paternity Benefits:** Employees are entitled to 17 weeks of paid parental leave, in addition to 15 working days of breastfeeding leave, as established by Royal Decree-Law 6/2019 of March. Furthermore, from June 2025, employees are entitled to an additional two weeks of paid parental leave. The company supplements its employees' salaries during this type of leave, paying the difference between the benefit the employee receives from Social Security and their full salary if they were working.

In terms of salaries, Línea Directa keeps a constant eye on the external reality in terms of salaries, for which it commissions salary studies and comparisons in order to maintain a coherent line in its internal salary policy with respect to the outside world.

The actions described in this section apply to all Company employees and are implemented annually. The **Quality in Employment** program, associated with the EFR people management model, ensures that Línea Directa 's workforce operates under a framework of beneficial working conditions that exceed the minimum requirements established by law. In this regard, no risks associated with material impacts have been identified, which, in any case and for the matter at hand, are covered by the Corporate Policies on Remuneration, Talent, and Human Rights.

Ultimately, the purpose of these actions related to job security is to create a culture in which employees can develop their professional career within the Company and find a positive environment in all aspects of their professional lives.

### **Well-being and work-life balance.**

With regard to the positive material impacts related to well-being and work-life balance, Línea Directa has a Corporate Health, Safety and Well-being Policy, among whose principles is the organisation's commitment to ensuring that the workforce maintains optimal levels of Well-being through benefits, advantages and Well-being programs, as well as with the work-life balance measures that the Company makes available to them.

In this regard, annual Health and Well-being programs are carried out and a catalog of work-life balance measures, in addition to those required by law, is kept open and available to employees.

The **key initiatives** carried out in 2025, as a continuation of the previous year, are presented below:

All actions within the Well-being and Health program are planned with an annual horizon. Their effectiveness is measured based on the number of employees participating in the activities. These impacts have repercussions on the Group's Sustainability Plan, as well as on ILP programs.

- The **Well-being and Health Program** includes concrete actions that positively impacts physical, emotional, and financial well-being, as well as preventative health measures. Notable initiatives include the celebration of " Health Week" in conjunction with World Health Day, during which various training sessions, charitable activities, and nutritional and emotional awareness programs were offered to employees. Additionally, the program includes in-office vaccination campaigns, health challenges, and regular participation in races and tournaments.
- All employees have **free online medical support** through the Línea Directa medical service, including basic psychological counseling.
- **Webinars and awareness sessions on health and well-being**, including topics such as emotional well-being (mindfulness sessions), health prevention sessions such as talks for early detection and first actions for stroke, which have had a high participation of employees.
- Within the Well-being program, the topic of **financial Well-being** is also addressed in partnership with Bankinter, which provides high-quality information and advice for employees, with content accessible to everyone. Employee participation has been measured in all sessions, which have generated significant interest. This year, the focus has been primarily on savings management and information on obtaining and managing mortgages.

- **Internal Digital Disconnection Policy**
- **Benefits Program** (Total Remuneration)
- The **Flexible Working** Procedure (Flexiwork) allows all Company employees to work from home for six days per month. This procedure is publicly available to all staff and accessible through the Employee Portal. Employees also have access to digital tools that allow them to manage these work-from-home days in conjunction with their manager, thus maintaining organisational harmony within their teams. This measure was approved following the pandemic and applies to all Línea Directa employees. Employee feedback on this policy is also included in the "Voice of the Employee" survey.
- **Paid leave** not covered by the applicable collective bargaining agreement: Línea Directa offers its employees additional leave that allows them to take paid time off to attend to various family-related matters. This includes a bank of hours **to care for dependent relatives** (parents or children), leave to accompany family members undergoing chemotherapy or radiotherapy who require assistance at their sessions (6 days per year, which can be taken in half-day increments), and leave to accompany first-degree relatives to **diagnostic tests** involving sedation that require the patient to be accompanied.
- Leave and benefits related to **maternity/paternity and breastfeeding**: Employees are entitled to 17 weeks of paid parental leave, in addition to 15 working days of breastfeeding leave, as established by Royal Decree-Law 6/2019 of March. The company supplements its employees' salaries during this type of leave, paying the difference between the benefit the employee receives from Social Security and their full salary if they were working. Additionally, Línea Directa offers 5 days of breastfeeding leave within 12 months of returning to work, instead of the 9 months after the birth of the child stipulated by law. With this, the Company promotes the use of this leave and provides greater flexibility.

All these permissions are extensions of the standard policy that the Company makes available to employees. They are all published on the Employee Portal for easy access. However, employees can always contact the Employee Services department should they require any further information or clarification.

The 2023-2025 Sustainability Plan pursued, among its initiatives, the objective of positively impacting the Health and Well-being of employees through actions related to physical activity, nutrition, emotional Well-being and financial Well-being, setting as a measure of compliance achieving a participation of 25% of the workforce in the period 2023 and 2025. By the end of 2025, compliance with this action has been 26.7%.

This objective responds to the principles of both the **Prevention, Health and Well-being Policy** and the Talent Policy, in which the organisation is committed to promoting the Well-being and healthy habits of the workforce (both salaried and non-salaried) in order to positively impact them.

To achieve this goal, the Group decided to integrate it into its Sustainability Plan, ensuring its review and monitoring by the various levels of governance within the plan, with the Board of Directors being the highest authority. An initial quantitative target was set to assess the impacts of the different actions on the workforce, aiming to reach 25% or more of the workforce through all actions implemented throughout the year. It is important to note that the Well-being and Health plans are annualized, meaning they comprise a set of actions carried out within a single fiscal year.

The program's progress, based on the established goal, is monitored by the People Services department, which drives the Well-being initiatives. This is done through the internal Employee Portal tool, which allows for the creation of events where employees can register for activities and provides the necessary tracking to measure their participation in each event. This monitoring is reported to the Sustainability Committee for review and submission to the Board of Directors as part of the overall implementation of the Sustainability Plan.

During fiscal years 2023 and 2024, the use of surveys in online campaigns was occasionally tested. The objective of this process was to evaluate a system that would allow us to focus on two aspects:

- The impact of the initiatives and employee satisfaction.
- This communication channel aimed to engage employees in shaping actions to meet established goals.

In 2025, and given that the tested trials have shown satisfactory results, surveys have been launched associated with some relevant actions such as health week, financial Well-being webinars, or participation in the Banco Santander Olympics.

Additionally, a specific question was included in the 2025 employee experience survey for employees to evaluate their satisfaction with the Well-being and Health Program. The result is consistent with the results of the surveys conducted on individual actions, achieving a score of 7.9 out of 10.

The 2025 Well-being and Health Program has included an employee health service that features early psychological support, and aims to contribute to improving the emotional health of those on sick leave.

It is expected that in the first quarter of 2026 the certification will be obtained again under the **EFR management model with a B+ level**, unifying the seals of Línea Directa Aseguradora and Línea Directa Asistencia.

In 2025, the **Top Employers** certification was maintained with a compliance rate of over 90%.

All the actions referenced are available to all employees and have information accessible both on individual channels (Intranet) and on corporate communication channels.

Employee well-being initiatives are monitored and audited by the EFR model and the Top Employers best practices audit. These two audits are also integrated into the Company's assurance framework. This provides a system for identifying findings, enabling the implementation of corrective measures to address risks arising from the well-being action plans.

With this objective and its actions, the Company aims to increase the well-being of employees from a broader perspective, for which the Company integrates well-being into its organisational culture.

## **Diversity and Inclusion.**

The fundamental objective of these initiatives is to highlight diversity in all its aspects among the company's workforce, so that everyone feels included and valued within this diversity. All diversity-related actions are also part of an annual action plan that combines ongoing initiatives with specific actions for the current year. The effectiveness of these plans and actions is measured, in part, through the "Employee Voice" survey, as well as through the diversity and inclusion questions included in the employee experience survey.

In short, this has allowed us to meet the expectations set for the 2025 fiscal year.

The following describes the **key initiatives** carried out in 2025 that continue those already carried out in previous years:

The Group has implemented two lines of action for managing the material opportunity related to diversity and inclusion:

- A diversity and equity awareness campaign for staff, developed in partnership with the **UN Global Compact** and the **European Diversity Charter**. It consists of short awareness videos sent to staff and produced by the Global Compact.
- Inclusion and awareness program for staff regarding functional diversity in collaboration with the Randstad Foundation and social entities collaborating with the Company.
  - **“Plan Tú Sumas” y “Sin límites”**
  - Integration and awareness programs with APROCOR
  - Specific awareness campaigns and actions

All these actions are implemented with either annual or permanent timeframes, depending on the specific action. Actions included in the "You Add Up" Plan are evaluated through the "Voice of the Employee" survey. For the remaining actions, which are still in their early stages, there are no specific effectiveness measurement systems in place, beyond the general impacts gleaned from the questions on this topic included in the employee experience survey.

Additionally, for the next period, the development of the Diversity Advisory Committee, the renewal of the UN Global Compact commitment, and the renewal of the European Diversity Charter commitment are planned to a greater extent.

The initiatives have been focused on the entire workforce. More specifically, actions related to the inclusion of people with functional diversity are spearheaded by the company's volunteer group, "Los Conmovedores". Regarding actions aimed at raising awareness about diversity, equity, Human Rights, and equality, among other issues, the company has created a Diversity Advisory Committee intended to serve as a body that identifies and mitigates potential risks in this area.

This exercise has shown that awareness campaigns, once launched, risk being forgotten or failing to achieve their intended reach. To address this issue, the Diversity Advisory Committee will be tasked with focusing on and managing various channels to broaden the dissemination of diversity-related information. Furthermore, the Company is a member of industry networks such as RED EWI, MásHumano, and Eje&Com, among others, which serve as a catalyst for promoting these initiatives both internally and externally.

Looking ahead, the Company will work on all these aspects through the Diversity Advisory Committee, which has already been given an identity in its constitution by having the support of Senior Management and which will act transversally within the Sustainability working group.

Furthermore, in keeping with the Company's strong commitment to disability inclusion, all Línea Directa Group **workplaces** are fully **accessible**. In addition, efforts are underway to communicate and raise awareness about disability, both internally and externally.

In 2025, the Sustainability Plan included an action related to accessibility consisting of obtaining and/or maintaining the Accessibility declaration, under criteria A and AA, of the Commercial Website, the Corporate Website and the Foundation Website, in addition to the

redesign of the private area and Línea Directa App, the customer chat and the Companies website with accessibility criteria.

The 2026-2028 Sustainability Plan continues to introduce accessibility as a strategic area, including as an action the creation of a governance model in this area, which serves to set global Group goals, coordinate efforts and serve as a lever to guarantee universal access for all users.

With these actions, the Group ultimately aims to integrate diversity into the organisation's culture so that all employees feel treated with respect and fairness, as outlined in the Diversity and Inclusion Policy.

### **Attraction and loyalty of talent**

Regarding talent attraction and development, the Group identifies a significant Positive impact on employee satisfaction from skills development within the Group, knowledge expansion, and internal promotion opportunities, as well as the opportunity to attract talent due to the Group's reputation as a good employer. At the same time, the Group faces the challenge of attracting and retaining qualified talent in a highly competitive environment, which stems from the Group's reliance on the human factor for successful business operations.

To manage these issues, Línea Directa has continued in 2025 to implement a series of actions, which it began in 2024, focused on strengthening the employer brand and generating visibility in specific talent niches; identifying and developing internal potential, including the Succession Plan study, as well as various training and development programs that allow the workforce to stay up to date with market demands.

Regarding talent attraction:

- Certifications and reputational indexes: Top Employers and MERCO Talento. Línea Directa receives certifications annually.
- Employer branding campaign: external communication. A plan is established each year.
- Links to relevant training entities: business schools. Ongoing work.
- Referral program. Open year-round. Benefits to Company employees.

Regarding professional development:

- Identification of potentials.
- Development/training program for potential candidates: The customer journey and 360 sales program.
- DARWIN program for middle management.

Regarding educational development:

- Strategic training program for new products and multi-line products.
- Supervisor program based on customer experience.

- Skills training: LinkedIn Learning (Learners).
- Training IT teams in artificial intelligence (AI).
- Copilot implementation (AI in B365 Microsoft Office).
- Regulatory and Sustainability Plan:
  - Alignment of the Three Lines of Defense, strengthening internal control and risk management processes.
  - The new Sustainability Reporting Standards (CSRD) for preparing to meet the most advanced sustainability standards.
  - DORA (Digital Operational Resilience Act), ensuring that teams understand and apply the new European regulatory requirements on digital operational resilience in the financial sector.
  - Occupational Risk Prevention, ensuring a safe and healthy working environment.

Línea Directa also considers employee training as a measure to reduce the potential impacts of the just transition to greener and climate-neutral operations.

All the actions described above have had different scopes because they are focused on specific groups rather than the general public. Each action has a different timeframe depending on whether it is a development or training program, or a training initiative related to new legislation. In any case, an annual plan is created each year outlining the scope of the various actions. Thanks to the group-based approach mentioned above, the Company is able to strengthen strategic areas for the business. The individuals who benefit from these programs are, by virtue of their position, training, and skills, those responsible for working in these areas, such as AI, which will then be applied across the entire Company at different levels and in different ways. In this way, strategic groups have been addressed in relation to the business and the Company's strategy for the current year.

The employer brand, for its part, has proven to be very strong. This is evidenced by Línea Directa 's continued success in the MERCO reputation monitor, maintaining its position year after year. This, combined with the strength of the brand, opens up the opportunity to attract the necessary talent from external sources.

Employee development and training are also considered key corrective measures to mitigate the risk of talent drain. Talent identification programs, group training, and formal education help maintain a network that mitigates this workforce-related risk.

Maintaining the actions mentioned in each exercise is considered crucial, as the continuous search for and training of strategic profiles is key.

Finally, employees find a development culture in which they can advance their professional careers within the organisation.

## **Resources dedicated to managing material impacts**

The Group has its own teams dedicated to developing measures to manage material impacts, as well as identified opportunities and risks. In this regard, the People and Communication Department, in collaboration with other departments, is responsible for developing these actions and/or new measures, depending on the specific issue.

Línea Directa allocates human and financial resources to this end. The Group believes that, through effective impacts management, new opportunities can emerge. In this regard, the Well-being and Health Program serves as an example, acting as an umbrella initiative to address various measures related to employee Well-being. Due to its implications and close connection with employees, this program is managed by the People Support team, comprised of three people (a Coordinator and two technicians). An annual budget is allocated to fund the program's activities. This budget covers, for example, all items related to managing the EFR (Family-Responsible Company) model and the costs associated with joining the UN Global Compact, Top Employers, and the Diversity Charter, among others.

Thanks to the commitments maintained, as well as the actions described and carried out, the company intends to ensure that its own practices do not cause or contribute to generating negative impacts on its own workforce.

More specifically, the present and future economic resources are:

- Presents 2025: € 53,254 allocated to Well-being and Health and Social Action in addition to the QReady employee medical service program
- Estimated 2026: € 90,584, which will be allocated to Well-being and Health, Diversity and Social Action and which include actions such as: Q Ready medical monitoring, participation in at least three popular races, the Banco Santander Olympics, the healthy training program, the 2026 health week and World Mental Health Day.

It should be noted that these financial resources are part of the budget allocated to People, Communication and Sustainability within the Group's financial statements.

## Metrics and targets

### **S1-5. Targets related to managing material negative impacts, advancing Positive impact and managing material risks and opportunities.**

The establishment of strategic business and personnel goals is carried out annually, along with the goals associated with variable remuneration. Both serve as drivers for achieving the goals set by the organisation and by each specific area. These goals are communicated both cascading down and individually, ensuring widespread dissemination of information among all staff.

In this regard, the company has maintained the same social goals for 2025 as in 2024, in order to continue consolidating its results and further promote awareness among all employees, including senior management.

Likewise, throughout the year actions have been carried out in these matters that have made it possible to make known, raise awareness and involve the staff in the social initiatives associated with the different plans and policies approved.

The communication processes with the staff in which the strategic goals are established occur through different processes:

- The CEO sets goals and cascading these goals down to the entire workforce through performance management. This is an annual procedure that begins in January/February. The aim is to align the Group under a set of goals that reflect the business strategy designed by the Steering Committee for the current year. This system applies to all Group employees (salaried staff) and is mandatory for everyone.

In this process, all managers and their teams are involved. The system uses its own tool (People Soft) to manage the entire Performance and Objectives framework. During the period of objective setting and communication to staff, the People Development, Communication, and Sustainability department is responsible for monitoring progress to ensure that all employees ultimately have their goals aligned with those established by the Group's CEO. The Group invests primarily in human resources for this system, ranging from the employees involved in setting goals to those responsible for monitoring the process. This monitoring is typically carried out by three people from the People area (the Coordinator and Development specialists).

The effectiveness of the process is primarily measured once the cycle closes at the end of the fiscal year with the CEO's evaluation of the achievement of the established goals. It should also be noted that this process has other essential implications for employees (salaried staff) within the Group, such as merit-based salary reviews or the impacts of their manager's evaluation on their own professional development. Ultimately, this is a key procedure aimed at achieving a fundamental goal for the organisation: reaching the established goals and fulfilling the business strategy set for the fiscal year.

- **Kick-off:** Communication from Senior Management to managers of the annual business and people strategy. In this case, the goal of this action is simply to align the leadership team with the principles of the business strategy for the current fiscal year. To this end, internal and external resources are allocated, allowing all Group managers to share the year's strategic goals with their Area Directors. Departments such as Internal Communications, which is responsible for the organisation, also participate. The effectiveness of this action is measured through a specific survey that allows the Communications Department to understand its impacts on the action from the perspective of its goal: strategic alignment of the workforce.
- **Quarterly sessions with the CEO** to review the organisation's results (Business/People) with managers and technical staff. This transparency initiative takes place quarterly, coinciding with the publication of the company's financial results (a requirement for publicly traded companies). Just as the company is accountable to institutions and the media, employees are directly involved in this information. As with the previous initiative, internal resources are allocated for this purpose. The Internal Communications department works alongside the Group CEO, utilizing internal resources (meeting rooms, building facilities, etc.). The effectiveness of these sessions is also measured through a specific satisfaction survey.
- **Mid-Point:** a meeting between managers and senior management to present key strategic projects, their progress, and follow-up. The philosophy behind this communication and transparency initiative is the same as that of the Kick-off meeting. The only difference here is that it is the company's middle managers who present the main projects they are working on to the rest of the management team. A key difference here is that the projects presented stem from the strategic goals set by the CEO at the beginning of the year. This initiative also utilizes internal and external resources, and its success and effectiveness are measured through a survey sent to all attendees.

Although no formal collaboration is established with workers' representatives for the establishment, monitoring and determination of improvements to the goals, meetings are held in a framework of cordial interaction.

The quarterly information sessions, along with the specific Kick-off and Mid-point strategy meetings, allow us to identify the evolution of the goals and the associated actions for their development and fulfillment.

The goals are also fueled by the dialogue with the staff established through the various listening points:

- Employee Experience Survey (biannual).
- Focus groups associated with the survey results.
- Opinion polls associated with moments of change or in specific areas.
- Surveys issued after communication sessions with the CEO.
- "The Employee Voice" survey associated with the EFR model / Focus group.
- Employee survey for the MERCO reputation monitor.

The results of the Employee Experience survey are communicated to the staff, along with lessons learned and improvements and progress to be implemented. In all other cases, managers promote the cascading communication of the results, goals, and identified improvements.

The goals established to manage the material impacts, risks, and opportunities related to the workforce, based on the references provided above, can be classified and measured based on:

- **EFR Management Model:** Proactive maintenance of certification with a B+ rating.
  - Annual execution position with triennial recertification.
  - Goals: to maintain the proactive B+ standards set by the EFR model.
  - Annual monitoring.
  - Employee Benefits: The Company aims to provide employees with a development environment and culture where they can benefit from a management model that fosters these aspects through measures that cover different levels.
- **Top Employers:** Maintaining certification with > 90% compliance.
  - Annual execution period (standardized by certification).
  - Goals: to keep the Company at the forefront of good practices in people management.
  - Monitoring: annual, as determined by certification.
  - Benefit for employees: having a certification that endorses the people management practices that directly affect their daily lives and from which they benefit in one way or another as a guarantee of quality.
- **MERCO Talento:** Improve reputation positions compared to the last fiscal year.
  - Annual execution period (standardized by certification).

- Goals: to keep the Company at the forefront of reputation as a company where talent finds a place for its development.
- Monitoring: annual, as determined by certification.
- Benefit for employees: This is a monitor that measures the Company's reputation levels and takes into account the perception of the Company's employees, which results in their ability to influence this aspect.
- **Execution of commitments** acquired in the **Diversity and Inclusion policy**.
  - Launch of the Diversity Advisory Committee.
  - Annual plan of impactful actions on Diversity, Equality and Inclusion.
  - 80% completion of the action plan.
  - Implementation period and annual monitoring with a semi-annual control point
  - Goals: to comply with the principles of the Diversity and Inclusion Policy through the actions contemplated in the future Diversity plan.
  - Benefit for employees: their participation is sought in the design of the actions, as well as in the impacts that these may have on the Company's workforce.
- **Execution of commitments** acquired in the **Talent policy**.
  - Training and Development Programs by groups.
  - Training adapted to the needs of each group.
  - Objective: training provided to >90% of the staff.
  - Project execution period: annual with semi-annual follow-ups.
  - Goals: workforce development, talent management in a way that contributes to employee well-being and the smooth running of the business.
- **Execution of commitments** acquired in the **Health, Safety and Well-being Policy**.
  - Well-being program.
  - Objective: to achieve >26.7% employee participation in shares.
  - Implementation timeframe: This is an annual plan that is reviewed at the end of the fiscal year. However, since the plan forms part of the Sustainability Plan's goals, progress toward the quantitative (absolute) target is monitored every six months.
  - The goals of the Well-being Plan (discussed in previous sections of this chapter) aim to create a culture of well-being within the Company that benefits employee health. In this sense, the benefits employees experience range from improvements in their quality of life in various areas: health, emotional well-being, financial security, and more.

The Group communicates these goals through detailed reports sent to the entire organisation containing the results of various employee climate surveys. Línea Directa sets its goals by

leveraging its variable remuneration structure (monthly, quarterly, and annually), as well as long-term incentives, which align the organisation toward achieving these goals. Performance is also tracked through cascading goals from the CEO down to the entire organisation across all departments.

All of this allows the organisation to be leveraged and aligned, and contributes to achieving the stated goals, which include actions to mitigate material risks and opportunities for its own workforce.

## S1-6. Characteristics of the undertaking's employees.

Línea Directa considers as salaried those people who have a current employment contract with Línea Directa, excluding those people who have training or internship contracts (e.g., interns).

All data relating to own workforce is reported as the average number of people throughout the reference period, all of them in Spain.

| Country   | Number of employees (head count) |         |
|-----------|----------------------------------|---------|
|           | 2024                             | 2025    |
| Spain     | 2,433.2                          | 2,411.8 |
| Portugal* | 0.0                              | 0.0     |

\*No actual operation in Portugal.

| Gender                 | Number of employees (head count) |                |
|------------------------|----------------------------------|----------------|
|                        | 2024                             | 2025           |
| Male                   | 1,021.8                          | 1,013.9        |
| Female                 | 1,411.3                          | 1,397.8        |
| Other                  | 0.0                              | 0.0            |
| Not reported           | 0.0                              | 0.0            |
| <b>Total employees</b> | <b>2,433.2</b>                   | <b>2,411.8</b> |

| <b>2024</b>                                                  |         |       |              |         |
|--------------------------------------------------------------|---------|-------|--------------|---------|
| Female                                                       | Male    | Other | Not reported | Total   |
| <b>Number of employees (head count)</b>                      |         |       |              |         |
| 1,411.3                                                      | 1,021.8 | 0.0   | 0.0          | 2,433.2 |
| <b>Number of permanent employees (head count)</b>            |         |       |              |         |
| 1,409.7                                                      | 1,021.4 | 0.0   | 0.0          | 2,431.1 |
| <b>Number of temporary employees (head count)</b>            |         |       |              |         |
| 1.7                                                          | 0.4     | 0.0   | 0.0          | 2.1     |
| <b>Number of non-guaranteed hours employees (head count)</b> |         |       |              |         |
| 0.0                                                          | 0.0     | 0.0   | 0.0          | 0.0     |
| <b>Number of full-time employees (head count)</b>            |         |       |              |         |
| 645.6                                                        | 677.3   | 0.0   | 0.0          | 1,322.8 |
| <b>Number of part-time employees (head count)</b>            |         |       |              |         |
| 765.8                                                        | 344.6   | 0.0   | 0.0          | 1,110.3 |

\*Gender as specified by the employees themselves

| <b>2025</b>                                                  |         |       |              |         |
|--------------------------------------------------------------|---------|-------|--------------|---------|
| Female                                                       | Male    | Other | Not reported | Total   |
| <b>Number of employees (head count)</b>                      |         |       |              |         |
| 1,397.8                                                      | 1,013.9 | 0.0   | 0.0          | 2,411.8 |
| <b>Number of permanent employees (head count)</b>            |         |       |              |         |
| 1,392.9                                                      | 1,007.8 | 0.0   | 0.0          | 2,400.8 |
| <b>Number of temporary employees (head count)</b>            |         |       |              |         |
| 4.9                                                          | 6.1     | 0.0   | 0.0          | 11.0    |
| <b>Number of non-guaranteed hours employees (head count)</b> |         |       |              |         |
| 0.0                                                          | 0.0     | 0.0   | 0.0          | 0.0     |
| <b>Number of full-time employees (head count)</b>            |         |       |              |         |
| 641.9                                                        | 678.8   | 0.0   | 0.0          | 1,320.7 |
| <b>Number of part-time employees (head count)</b>            |         |       |              |         |
| 755.9                                                        | 335.2   | 0.0   | 0.0          | 1,091.1 |

\*Gender as specified by the employees themselves

Details on the number of salaried employees are available in Note 21. B) of the financial statements.

The percentage of employees with temporary contracts is less than 1% (0.086%). There are no employees with non-guaranteed hours within the Linea Directa Group .

|                                                   | <b>2024</b> |          |          |
|---------------------------------------------------|-------------|----------|----------|
|                                                   | Female      | Male     | Total    |
| <b>Number of people who have left the company</b> | 169         | 156      | 325      |
| <b>Average number of people per year</b>          | 1,411.30    | 1,021.80 | 2,433.20 |
| <b>Turnover Rate</b>                              | 12.0%       | 15.3%    | 13.4%    |

|                                                   | <b>2025</b> |          |          |
|---------------------------------------------------|-------------|----------|----------|
|                                                   | Female      | Male     | Total    |
| <b>Number of people who have left the company</b> | 156         | 158      | 314      |
| <b>Average number of people per year</b>          | 1,397.80    | 1,013.90 | 2,411.80 |
| <b>Turnover Rate</b>                              | 11.2%       | 15.6%    | 13.0%    |

The turnover rate is determined as the ratio between the number of people who have permanently left the company during the reference period and the average number of people throughout the year.

## **S1-7. Characteristics of non-employee workers in the undertaking's own workforce.**

Línea Directa considers as its own non-salaried staff those people hired through temporary employment agencies (ETT), as well as interns, who are those people linked through an agreement with the university or study center.

Data relating to non-salaried employees of own workforce are reported as the average number of people throughout the reference period, all of them in Spain.

| Type of non-salaried employees | Number of people – Average |              |
|--------------------------------|----------------------------|--------------|
|                                | 2024                       | 2025         |
| ETT (temp)                     | 73.3                       | 65.7         |
| Interns                        | 30.7                       | 34.3         |
| <b>Total</b>                   | <b>104.0</b>               | <b>100.0</b> |

### S1-9. Diversity metrics.

In order to understand the gender diversity among senior managers and the age distribution of the Company's employees, the following data is presented:

|                     | 2024   |       |
|---------------------|--------|-------|
|                     | Female | Male  |
| Senior Management   | 7.0    | 6.0   |
| % Senior Management | 53.8%  | 46.2% |

|                     | 2025   |       |
|---------------------|--------|-------|
|                     | Female | Male  |
| Senior Management   | 7.0    | 7.0   |
| % Senior Management | 50.0%  | 50.0% |

| Number of people by age - Average | 2024           |                |                |
|-----------------------------------|----------------|----------------|----------------|
|                                   | Female         | Male           | Total          |
| 1. < 30                           | 154.6          | 131.0          | 285.6          |
| 2. >=30 and <50                   | 878.5          | 671.8          | 1,550.3        |
| 3. >=50                           | 378.3          | 219.1          | 597.3          |
| <b>Total</b>                      | <b>1,411.3</b> | <b>1,021.8</b> | <b>2,433.2</b> |

| Number of people by age - Average | 2025           |                |                |
|-----------------------------------|----------------|----------------|----------------|
|                                   | Female         | Male           | Total          |
| 1. < 30                           | 149.8          | 124.0          | 273.8          |
| 2. >=30 and <50                   | 826.6          | 640.5          | 1,467.1        |
| 3. >=50                           | 421.5          | 249.4          | 670.9          |
| <b>Total</b>                      | <b>1,397.8</b> | <b>1,013.9</b> | <b>2,411.8</b> |

### S1-10. Adequate wages.

As in 2024, under the article in the Workers' Statute concerning the Minimum Interprofessional Wage, 100% of our own workforce received an adequate salary in 2025, being paid above the Minimum Interprofessional Wage (SMI). The only exception is interns, whose remuneration is subject to the conditions established in their internship agreements.

## S1-11. Social protection

As in 2024, 100% of the company's own workforce in 2025 are covered by Social Security.

## S1-12. People with functional diversity.

For the purposes of this calculation, any employee with a disability certificate issued by the competent authority is considered a person with a disability. The calculation is weighted according to the length of time these individuals have had a valid employment contract.

To help understand the extent to which people with functional diversity are included among the Company's employees, the following data is presented:

|                            | 2024    |         |         |
|----------------------------|---------|---------|---------|
|                            | Male    | Female  | Total   |
| Average disabled employees | 18.0    | 20.4    | 38.4    |
| Average headcount          | 1,021.8 | 1,411.3 | 2,433.2 |
| % Employees                | 1.8%    | 1.4%    | 1.6%    |

|                            | 2025    |         |         |
|----------------------------|---------|---------|---------|
|                            | Male    | Female  | Total   |
| Average disabled employees | 16,2    | 22,9    | 39,0    |
| Average headcount          | 1.013,9 | 1.397,8 | 2.411,8 |
| % Employees                | 1,6%    | 1,6%    | 1,6%    |

## S1-13 Training and skills development metrics.

In 2025, Línea Directa continued to promote the training and skills development of its employees as a fundamental pillar for achieving the company's strategic goals, in a year marked by the evolution of the organisational model, the strengthening of the control environment, and the acceleration of digital and analytical transformation. Following the approach of previous years, the training strategy was designed and deployed in alignment with business priorities, supporting employees in the necessary preparation for their roles and in adapting to new environments.

The training programs developed throughout the year combine technical knowledge, commercial, digital, and analytical skills, as well as transversal competencies, all essential for improving operational efficiency, strengthening data-driven decision-making, driving innovation, and consolidating responsible and sustainable business management. This comprehensive approach ensures that employees have the necessary skills to actively contribute to the organisation's current and future challenges.

2025 was a year in which Línea Directa strengthened its commercial capabilities and consolidated its focus on customer experience. This progress was accompanied by a strong commitment to the development of its people, ensuring they are prepared for the new challenges, products, and relationship models that the business demands.

Among the most relevant training projects developed during the year, the following stand out:

- **New Multi-Risk product:** comprehensive preparation for the launch of the new product, including the incorporation of teams ensuring a complete view of the product and its impacts on the client.
- **Specific program for Health teams:** a comprehensive program designed to strengthen the technical knowledge and specialization of Health teams. This work has allowed for a deeper understanding of the main services within the sector, ensuring consistent training geared towards more comprehensive and differentiated care.
- **Consultative selling program:** designed to ensure that each client receives a proposal tailored to their actual needs. This approach enhances the quality of advice through more precise active listening and a diagnostic process that allows for advanced customization of the solutions offered.
- **Professional Development Program for potential Customer Journey:** These projects continue to be fundamental to working on the Global Vision of the teams that have direct contact with customers from an experiential perspective, enhancing internal talent.

The **Línea Directa Voice Project** plays a prominent role and has continued to solidify its position as a key element in strengthening every customer interaction. Through this program, the brand's values—"The value of being direct"—being decisive, approachable, trustworthy, and innovative—are consistently integrated into daily communication, ensuring that every conversation reflects the authenticity and essence of Línea Directa .

Throughout the year, efforts have been made to strengthen and expand the scope of the program, incorporating new training dynamics and tools that make it easier for teams to naturally internalize these values in their professional activity.

Furthermore, thanks to new artificial intelligence capabilities, progress has been made in extracting KPIs focused on excellence. These indicators provide a precise and continuous view of the model's adoption rate, contributing to improved customer experience. It's also worth mentioning that the project received the **GRAF 2025 Bronze Award for best training initiative**.

Each of these projects reinforces Línea Directa 's commitment to its multi-product strategy, while consolidating a distinctive customer experience based on innovation, quality, and added value in every interaction.

One of the most significant training projects of 2025 has been the advancement of Analytical Transformation through the consolidation of the **PI 2.0 Program**, aimed at building a solid and professional analytical team within a new Data Governance model. In this context, a professional development project has been designed that includes several training pathways in Reporting, Analysis, Modeling and Big Data, Business Intelligence, and Data Governance, complemented by a cross-cutting Soft Skills pathway. These initiatives are strengthening continuous learning, creating a common language, and moving towards a more consistent, secure, and standardized use of data within the organisation.

In particular, during the year the Data Governance itinerary has begun to be delivered, aimed at the entire group of Analysts, addressing principles, policies, roles and corporate tools, contributing to the consolidation of the data control and quality structure.

In the area of digital transformation, the **Generative Artificial Intelligence Adoption Project** was conceptualized and deployed in 2025. This project includes various training programs aimed at management, supervisors, and coordinators with a strategic focus, as well as technical profiles working on AI projects in business applications and support staff experimenting with AI to improve their productivity. Furthermore, the entire organisation has

been trained in the responsible use of AI in accordance with the European Union's Artificial Intelligence Regulation.

The project, which began in 2025, will continue in 2026, monitoring the adoption and use of corporate tools, as well as the identification and assessment of use cases with real impacts.

To contribute to the technological transformation, specialized training in DevOps has continued, accompanying the progressive implementation of this work model, and with technical programs in programming languages and new front architectures (HTML, Java, CSS and React), ensuring the preparation of the professionals who lead the technological evolution.

In 2025, a new **Leadership Model** was also developed and conceptualized, aligned with Línea Directa 's strategy and future challenges. This model defines the key behaviors that leaders must exhibit in this new environment, taking into account new ways of working and functional leadership, as well as the behaviors of leaders in the age of AI. This new Leadership Model was co-created collaboratively, integrating contributions from different areas and groups to ensure its authenticity and relevance.

Technical preparation for the teams has played a significant role, with particular emphasis on Behavioral Economics (BECO) training, which has been a key driver in strengthening the understanding of human behavior and its application to the design of products, services, and customer experiences. Throughout the year, both introductory sessions and advanced programs have been offered, targeting strategic groups such as Marketing, Sales, Digital Transformation, Portfolio Management, Quality, and Customer Experience. This training has enabled professionals to acquire knowledge of cognitive psychology, biases, decision-making models, and persuasion tools applied to the insurance sector, thereby enhancing their ability to anticipate behaviors and improve conversion rates and user experience.

In the area of cybersecurity, Línea Directa has reinforced its approach based on awareness and continuous training, deploying a corporate **Cybersecurity Culture Plan** aimed at all employees. This plan has been complemented by specific training stemming from new regulatory obligations, such as the implementation of the DORA framework, ensuring the understanding and application of requirements related to digital operational resilience.

Once again this year, the **Regulatory and Sustainability Plan** has made it possible to structure and standardize mandatory training initiatives in key areas such as the **Code of Ethics, Fiscal Policy, Data Protection and Psychosocial Risks**, reinforcing essential skills and promoting individual responsibility in regulatory compliance.

This framework is complemented by ongoing training in Risk Assessment Methodology and Internal Control, aimed at the profiles included in the assurance map defined by Risk and Audit. The program ensures a consistent understanding of risk culture, the control environment, the three lines of defense model, and corporate methodology, including specialized training for critical areas such as Internal Audit and Risk, with updates to the COSO framework.

Additionally, the company has supported specialized technical development, highlighting the participation of Risk professionals in COSO Internal Control accreditation programs, thus reinforcing technical rigor and professional excellence in key functions.

Taken together, all these training initiatives reinforce Línea Directa 's commitment to continuous learning, the development of strategic capabilities and proper risk management, ensuring that its employees are prepared to adapt and lead in a dynamic and highly regulated business environment.

Línea Directa sent a performance evaluation to each employee during 2025, thus complying with the guidelines established by the **People, Communication and Sustainability**

**Department.** 96.4% of employees participated in the evaluation campaign, representing an increase of 2.6 percentage points compared to the previous year.

|             | 2024   |       |       |
|-------------|--------|-------|-------|
|             | Female | Male  | Total |
| % Evaluated | 93.5%  | 94.1% | 93.8% |

|             | 2025   |       |       |
|-------------|--------|-------|-------|
|             | Female | Male  | Total |
| % Evaluated | 96.2%  | 96.5% | 96.4% |

Additionally, the average number of training hours per employee and by gender is presented:

|                                | 2024        |             |             |
|--------------------------------|-------------|-------------|-------------|
|                                | Female      | Male        | Total       |
| 1. Managers                    | 27.6        | 35.5        | 31.3        |
| <b>2. Expert professionals</b> | 30.5        | 33.0        | 31.8        |
| <b>3. Professionals</b>        | 22.4        | 21.9        | 22.2        |
| <b>4. Staff</b>                | 32.1        | 29.1        | 30.9        |
| <b>Total</b>                   | <b>29.1</b> | <b>28.2</b> | <b>28.7</b> |

|                                | 2025        |             |             |
|--------------------------------|-------------|-------------|-------------|
|                                | Female      | Male        | Total       |
| 1. Managers                    | 47.0        | 53.0        | 49.9        |
| <b>2. Expert professionals</b> | 39.0        | 40.3        | 39.7        |
| <b>3. Professionals</b>        | 23.3        | 21.7        | 22.7        |
| <b>4. Staff</b>                | 29.0        | 27.9        | 28.5        |
| <b>Total</b>                   | <b>29.1</b> | <b>29.6</b> | <b>29.3</b> |

### S1-15. Work-life balance metrics.

The following table presents the work-life balance parameters, which includes the right and practices among employees to take leave for family reasons in an equitable manner with respect to gender. The following data is presented below:

| Balance metrics                                | 2024   | 2025   |
|------------------------------------------------|--------|--------|
| Employees entitled to this right               | 100.0% | 100.0% |
| Employees who actively benefit from this right | 34.0%  | 33.9%  |
| Female                                         | 22.1%  | 21.4%  |
| Male                                           | 11.9%  | 12.5%  |

Thanks to current collective bargaining agreements and the workers' Statute, all employees are entitled to take leave for family reasons.

## S1-16. Remuneration metrics (pay gap and total remuneration)

Within the framework of the Double Materiality analysis conducted to identify the material impacts, risks, and opportunities related to our own personnel, the direct materiality of the issue of remuneration parameters, including the gender pay gap and total remuneration, was not determined. However, this aspect was identified as a cross-cutting element within the theme of diversity, equity, and inclusion, which was deemed material given its close relationship with the promotion of equal opportunities and pay equity.

This section presents information related to the gender pay gap due to its relevance in the double materiality exercise.

The **gender pay gap**, defined as the difference between the average pay levels of female and male employees, and expressed as a percentage of the average pay level of male employees, in 2025 was **11.39%** compared to 10.42% in the previous year.

|             | Hourly wage  | Hourly wage  | N°              | N°              | Gap by level  |
|-------------|--------------|--------------|-----------------|-----------------|---------------|
|             | Female       | Male         | Female          | Male            |               |
| <b>2024</b> | <b>23.05</b> | <b>25.73</b> | <b>1,399.00</b> | <b>1,018.58</b> | <b>10.42%</b> |
| <b>2025</b> | <b>24.16</b> | <b>27.27</b> | <b>1,385.83</b> | <b>1,011.35</b> | <b>11.39%</b> |

The 11.39% gender pay gap reported in this section does not take into account the specific characteristics of each job (level of responsibility, skills, etc.), but rather compares the average hourly wage by gender (women versus men). Analyzing the gender distribution across different professional groups at Línea Directa, it is observed that in the higher salary groups (Executives and Expert Professionals) the percentage of women reaches 50%. However, in the lower salary groups (Staff and Professionals) the percentage of women exceeds 60%, since the female gender is naturally more represented, which negatively impacts the calculated pay gap.

However, the adjusted hourly pay gap falls to 2.65% in 2025 compared to 3.13% in 2024. The adjusted hourly pay gap by professional level reflects the Group's circumstances, as it takes into account the specificity of each position and provides an average for each of them.

In conclusion, the lack of a homogeneous distribution by gender in the organisation, determined by the nature of the existing positions, directly influences the pay gap.

The **methodologies** for calculating the gender gap and the hourly adjusted gap are presented below.

The following formula was used to calculate the gender pay gap:

$$\frac{(\text{Average gross hourly wage of male employees} - \text{Average gross hourly wage of female employees})}{\text{Average gross hourly wage of male employees}}$$

x 100

To calculate this hourly pay gap adjusted by professional category, employees are grouped into **clusters** made up of people who perform similar functions or hold similar positions. The gap in each cluster is identified, and to determine the overall gap, it is weighted by the number of people in each cluster.

The pay gap is calculated monthly to ensure that each person is compared to their peers on a monthly basis, taking hourly pay into account. The formula is as follows:

$$\text{Adjusted hourly pay gap by professional category} = \sum_{n=1}^N \frac{\text{Gap in each cluster} \times \text{Number of employees in cluster}}{\text{Total number of employees}}$$

Finally, the pay gap in each cluster is calculated:

$$\text{Pay gap} = \frac{\text{Average hourly wage for men} - \text{Average hourly wage for women}}{\text{Average hourly wage for men}}$$

On the other hand, the relationship between the highest-paid person and the median total annual remuneration of all salaried workers in 2025 is 19.32 compared to 14.83 in 2024.

### S1-17. Incidents, complaints and severe Human Rights impacts.

As explained throughout this chapter, Línea Directa has a reporting channel for breaches of the Code of Ethics, which is freely accessible to all employees and is completely anonymous and confidential. It also has a Harassment Protocol designed to prevent inappropriate situations that could hinder the normal operation of the company and that could lead to workplace harassment, sexual harassment, harassment based on sex, or discriminatory treatment.

In 2025, the Group registered only two complaints through the dedicated channel for harassment cases, with no other complaints, grievances, or impacts related to Human Rights or discrimination. Both complaints were handled in accordance with established internal procedures, and following the corresponding investigation, no evidence of harassment or rights violations was found in either case, as was the case in 2024, when no cases were registered either.

In 2025, the Ethics Channel received fifteen reports, of which thirteen were closed without investigation and the remaining two were investigated for possible regulatory non-compliance (no non-compliance by Group employees or collaborators was confirmed in either case). None of the reports received were found to constitute Human Rights violations, just as in 2024 when no cases of non-compliance in this regard were identified.

These issues are managed in accordance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises. As a result, no fines, penalties, or remuneration have been levied during the period under review.

On the other hand, to maintain its EFR seal accreditation, Línea Directa must guarantee the absence of sanctions related to work-life balance, understood in its broadest sense. Furthermore, Línea Directa collaborates with the United Nations Global Compact (Spain), providing relevant information for the preparation of its progress report, which includes this commitment among other aspects.

In line with its commitment to respect for Human Rights and non-discrimination, the Group incorporates into its harassment protocol a specific procedure that, in the event of an incident

related to Human Rights, ensures the alleged victim, when necessary, receives medical, psychological and social support, through internal or external resources.

Finally, Línea Directa guarantees the existence of a registry containing the information received in complaints and the investigations carried out. This registry is not public, respects confidentiality, and is available to the judicial authorities upon request.

## Consumers and end users (ESRS S4)

### Strategy

#### **SBM-3. Material impacts, risks and opportunities and their interaction with strategy and business model**

Línea Directa Aseguradora, through a Double Materiality analysis conducted throughout 2024 and updated in 2025, has identified one material risk and three material opportunities related to consumers, specifically concerning customer satisfaction and responsible marketing. These issues are linked to and connected with its business strategy and model. Among the strategic lines of Línea Directa's **Fifth Sustainability Plan 2023-2025** are "Quality: Customer-centric", and "Sustainable Products and Services". These lines prioritize ESG actions and lead to concrete actions that define the Plan, aiming to connect the business strategy with the customer strategy and seek a balance between the two.

Within the strategic approach of the new Sustainability Plan 2026-2028, approved in December 2025, are the lines of action for Quality and customer management.

The entity has considered the specific characteristics of its customers, such as people with functional diversity and other vulnerable groups, in carrying out this exercise, identifying a material opportunity directly related to these groups. This opportunity involves implementing improvements in accessibility and addressing the needs of vulnerable groups through insurance policies tailored to their specific needs and characteristics. The remaining material opportunities and risks identified apply to all client groups and segments served by the Group.

In order to consider and anticipate future scenarios, the entity monitors material opportunities and risks related to consumers and end users. These are closely related to the identified impacts, although none have yet proven to be material.

The opportunities identified as material include the commitment to innovation through the offering of products and services, the personalization and accessibility of said products and services, and the specific attention to vulnerable groups through adapted solutions.

The only **potential material risk** is related to the **provision of the service in an inadequate or insufficient manner** with respect to customer expectations.

The Group recognizes that customer satisfaction and meeting their expectations depend on continuous improvement in its product and service offerings, as well as on communication and expert advice. This can translate into opportunities if managed correctly, or into risks if not addressed appropriately. Both perspectives reflect the Group's reliance on customer satisfaction for the successful development of its business. In all cases, the Group takes particular care to establish control measures to achieve a higher level of customer satisfaction.

As mentioned, although no impacts related to consumers or end users have been found to be material, the Group identifies and classifies these groups as follows:

- Customers insuring personal risks, such as vehicles, homes, or health services.
- Customers insuring risks tied to their business activities, like commercially used vehicles.

Both segments share a preference for direct contact with the Group, without intermediaries and through remote channels, whether by phone or digital platforms.

In addition, other user groups are identified:

- End users of the advertising produced by the Group.
- Social media users where they can interact with the Group and other users, as well as express public opinions derived from their activity on these platforms (LinkedIn, Facebook, X, etc.).

This classification allows the Group to better understand the needs and expectations of each group, facilitating the development of service and communication strategies that strengthen the relationship with its consumers and end users.

## Impacts, risk and opportunity management

### S4-1. Policies related to consumers and end-users.

Línea Directa has a Product Control and Governance Policy, a Social Impacts and Financial Inclusion Policy, a Sustainability Policy, a Responsible Procurement Policy, and an Outsourcing Policy. These policies outline the company's commitments and responsible practices for managing and addressing material risks and opportunities related to consumers and end users. Approved by the Board of Directors, these policies are reviewed periodically to ensure they remain current and relevant in a dynamic business environment.

#### Product Control and Governance Policy.

The Product Control and Governance Policy aims to establish the requirements for the control and governance of insurance products designed, developed and marketed by Línea Directa , so that customers have all possible guarantees when contracting insurance in accordance with applicable regulations.

This policy establishes the guidelines to be followed and regulates the marketing process for new insurance products in all its phases: design, approval, and distribution, as well as the control and monitoring of existing products, and corrective measures where necessary. Therefore, the policy applies to all individuals involved in the design, approval, and distribution processes of Línea Directa Aseguradora S.A.'s insurance products, under any of its brands.

The principles of action are aligned with the commitments to transparency and quality in customer relations assumed in the Code of Ethics. They focus on the following:

- Satisfying customer needs by addressing their interests, goals, and characteristics, and offering products that suit their circumstances and needs.
- Continuous improvement of the supply and quality of products and services, providing value and benefits to the consumer, society or the environment.

- Transparency and truthfulness in product offers.
- Strict adherence to regulations and commitments made.
- Product sustainability, promoting environmentally friendly products and services that support the transition to a sustainable and decarbonized economy. Furthermore, guaranteeing non-discrimination of customers, facilitating access to insurance for vulnerable groups or those with special needs, and fostering innovation in products and services to broaden their reach.

These operating principles are available on the Company's website.

The latest update to the Product Control and Governance Policy was approved in April 2025. This update includes an expansion of the policy principles regarding the integration of AI into product design and development processes, with the aim of ensuring fair treatment for users and equitable, secure, explainable, and transparent decision-making.

The following material opportunities and risks for the entity are associated with the topic of product control and governance:

- Opportunity: Promoting innovation within the Company to improve customer well-being and satisfaction through a wide range of specialized products and services tailored to their needs.
- Opportunity: Development of a more accessible product and service offering adapted to the needs and characteristics of customers.
- Opportunity: Implementation of improvements in accessibility and attention to the needs of vulnerable groups thanks to insurance adapted to their specific needs and characteristics.
- Risk: Providing the service in an inadequate or insufficient manner compared to customer expectations.

To ensure compliance with the Línea Directa Group's policy, it has a Product Approval and Monitoring Committee.

The Product Control and Governance Policy is available internally to Company employees. Additionally, the principles of this policy are published on the corporate website, which is accessible to customers and other Stakeholders.

### **Social Impacts and Financial Inclusion Policy.**

Through its Social Impacts and Financial Inclusion Policy, the Group is committed to promoting the sustainable development and progress of the communities in which it operates. To this end, Línea Directa and its subsidiaries strive to improve people's quality of life and security by aligning the provision of products and services, creating value, and implementing a social contribution strategy that fosters sustainable socioeconomic development and facilitates access to insurance for vulnerable groups.

The main goals it presents are to define the principles of social contribution, the orderly management of said contribution, the maximization of the Positive impact and the promotion and management of financial inclusion, both through the design of products that favor inclusion and through awareness-raising actions.

The Línea Directa Group views its social contribution and financial inclusion initiatives as a medium- and long-term commitment, aligned with its business and the needs of the

community. Its social contribution is structured around five key areas: road safety, home safety, healthy habits, social inclusion, and sustainability. The Group is committed to creating value through voluntary actions, collaboration with public and private entities, and adapting to community needs. Furthermore, it promotes employee involvement through corporate volunteering, donations, and community contributions. It also promotes awareness and training initiatives to strengthen its social impacts.

From a financial inclusion perspective, the Group bases its actions on identifying vulnerable groups, training its staff to avoid aggressive sales practices, and engaging in dialogue with external entities to promote an inclusive financial market.

To this end, the Group is committed to innovating its service offerings for these groups, adapting product delivery to their needs, providing non-financial support and raising awareness about the insurance sector, preventing over-indebtedness through financial education, and implementing accessible complaint mechanisms.

The coordination and registration of social contribution and financial inclusion activities, as well as the communication of the Policy, both of Línea Directa Aseguradora and of the subsidiaries and of the Foundation, will be the responsibility of the People, Communication and Sustainability Area.

The principles and commitments outlined herein apply to all employees, managers, and directors of all companies within the Línea Directa Group, as well as to the Línea Directa Foundation, in accordance with applicable regulations. In this context, the Group will also promote its collaborators and other individuals involved in its operations, products, and services to adhere to the policy.

The Social Impacts and Financial Inclusion policy is available to Stakeholders on the official Línea Directa website, thus ensuring its accessibility and transparency.

In June 2024, the Social Impacts and Financial Inclusion policy was updated to strengthen its commitment to the inclusion of vulnerable or underserved groups.

The following material opportunity for the entity is associated with the theme of social impacts and financial inclusion:

- Opportunity: Development of a more accessible product and service offering adapted to the needs and characteristics of customers.
- Opportunity: Implementation of improvements in accessibility and attention to the needs of vulnerable groups thanks to insurance adapted to their specific needs and characteristics.

### **Responsible Procurement Policy.**

The Responsible Procurement Policy aims to establish the principles governing the selection of suppliers to ensure that the needs for goods and services of the Línea Directa Group are met efficiently and with quality, and that they are geared towards a commitment to contribute to the sustainability of the economic and social development of the environment.

The Línea Directa Group bases its purchasing practices on compliance with applicable regulations and adherence to the following international agreements and commitments: the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights, the

International Labour organisation (ILO) Fundamental Conventions, and the United Nations Convention on the Rights of the Child.

The policy, which applies to all companies in the Línea Directa Group and whose compliance is the responsibility of all individuals within the group, aims to:

- Establish appropriate measures to optimize the impacts resulting from the Group's purchasing and contracting decisions.
- Ensure the suitability of the suppliers you work with.

To achieve this, Línea Directa relies on several key pillars, such as improving the efficiency of purchases, renewals, and expansions, while complying with legal requirements regarding Human Rights, labor, and the environment, and promoting the prevention of corruption. Furthermore, it prioritizes adherence to the Línea Directa Code of Ethics and the Supplier Code of Conduct, fostering transparent and ethical professional relationships.

It also constantly seeks to innovate with new products, services, and suppliers, and requires these suppliers to follow a socially responsible strategy. A clear separation of duties is guaranteed in the purchasing processes, collaboration is facilitated in the outsourcing of critical activities, and the renewal of long-term supplier contracts is promoted. Finally, it aims to ensure that award decisions are transparent, objective, and impartial.

To ensure compliance with this policy, Línea Directa has established a governance and monitoring model, with ultimate responsibility resting with the Board of Directors of Línea Directa Aseguradora. The Board is the highest supervisory body for compliance with the Procurement Policy and is responsible for its approval, based on proposals from the Audit and Compliance Committee. The Appointments, Remuneration, and Corporate Governance Committee is informed as appropriate. The Procurement Department, which reports to the Finance Department, is responsible for and will periodically review the content of this policy. Finally, the Procurement Department, together with designated representatives in the subsidiaries, is responsible for the correct implementation of this policy and for evaluating suppliers and their bids when making decisions regarding the awarding of contracts.

The policy is available to the organisation's Stakeholders through the corporate website, and, additionally, on the intranet for employees.

The following material risk to the entity is associated with the Responsible Procurement Policy:

- Providing the service in an inadequate or insufficient manner compared to customer expectations.

### **Outsourcing Policy.**

The objective of this policy, applicable to all staff of the Línea Directa Group, is to establish the appropriate mechanisms to ensure that the total or partial outsourcing of services will be adapted to the quality of service standards for Línea Directa customers, contractually documenting the service levels and other supplier control clauses.

Furthermore, the policy requires compliance with the applicable regulations, and in particular: Directive 2009/138/EC and implementing regulations (Solvency II), applicable to outsourcing of services related to insurance or reinsurance activity, and the European Digital Operational Resilience Act (DORA), applicable to any ICT outsourcing.

This policy, which defines the general outsourcing procedure, summarizes the requirements and conditions demanded in the case of regulatory and/or ICT service outsourcing, specifically:

- The pre-outsourcing analysis that must be carried out, among other things, developing the criteria to determine whether a function or activity is critical or important.
- The decision-making process regarding outsourcing and the appointment of the person responsible for the outsourced functions.
- The details that must be included in the contract signed with the service provider.
- Business contingency plans, including the conditions for termination or rescission of the contract, in the case of critical or important outsourced functions or activities.
- The requirements and formalities that must be applied additionally in the case of outsourcing to cloud service providers.
- The mechanisms for registering outsourced activities and reporting to the Management Committee, the Board of Directors, and the regulator.

The policy is reviewed annually and its approval or modification is the responsibility of the Board of Directors, based on proposals from the Línea Directa Audit and Compliance Committee, which is responsible for overseeing its application and compliance.

This policy is made available internally to Company employees via the intranet.

The following material risk is associated with the entity's outsourcing policy:

- Providing the service in an inadequate or insufficient manner compared to customer expectations.

### **Sustainability Policy.**

The Sustainability Policy of Linea Directa Group, approved by the Board of Directors, establishes the framework for the integration of environmental, social and governance (ESG) criteria into its strategy and daily operations and establishes the common goal of creating shared value in the long term.

One of the key focuses of this policy is Línea Directa 's relationship with its customers and policyholders. Among its commitments and guiding principles related to customers and policyholders, Línea Directa includes promoting innovation and digitalisation in its products and services to improve the customer experience and anticipate market trends. It guarantees clear and truthful information before policy purchase, offering accessible, high-quality service with continuous monitoring of customer satisfaction. Furthermore, it protects data confidentiality, streamlines claims management, and maintains efficient communication channels tailored to the needs of its policyholders.

A more detailed description of this policy can be found in the ESRS S1 chapter on own workforce.

The sustainability policy refers to the 3 material opportunities related to consumers and end users:

- Opportunity: To foster innovation within the Company to improve customer well-being and satisfaction through a wide range of specialized products and services tailored to their needs.

- Opportunity: Development of a more accessible product and service offering adapted to the needs and characteristics of customers.
- Opportunity: Implementation of improvements in accessibility and attention to the needs of vulnerable groups thanks to insurance adapted to their specific needs and characteristics.

### **Human Rights policy: commitments to consumers and end-users.**

As mentioned in the chapter related to its own workforce, Línea Directa Aseguradora is part of the Spanish Network of the United Nations Global Compact and is committed to incorporating the UN Guiding Principles on Business and Human Rights into its activities. To this end, since 2020, it has had a Human Rights Policy that has been approved by the Board of Directors and is applicable to all subsidiaries of the Group.

The Policy aims to guide the protection and respect of these rights, preventing their violation and reflecting the Group's commitment to international, local, and industry standards, such as the United Nations Global Compact, the United Nations Principles for Responsible Investment, and the UN Principles for Sustainable Insurance. In addition to describing how this protection is implemented in its operations, the Policy also outlines Línea Directa 's commitments in its roles as an employer, insurer, investor, employee, and in relation to its environment.

Within the framework of its activity as an insurer, Línea Directa 's Human Rights commitments focus on:

- 1 To provide transparent and honest advice, guaranteeing complete and truthful information about products and services, providing customers with all the necessary information before hiring.
- 2 Maintaining an equitable relationship with customers, designing products and services tailored to their needs and circumstances, ensuring non-discrimination of current and potential customers, and promoting innovation to facilitate access to insurance for diverse groups.
- 3 To guarantee the quality, accessibility and relevance of the service within the agreed timeframes.
- 4 Comply with personal data protection regulations, ensuring confidentiality, the right to privacy and the privacy of customer information.

As part of its Human Rights due diligence process, Línea Directa identifies potential Human Rights violations in this area based on the commitments made by the Group. In identifying vulnerable groups, Línea Directa has also considered women, children, immigrants, contractors, and local communities. Furthermore, it has paid particular attention to senior employees, from the perspective of product design and marketing, and to people with functional diversity, addressing both their access to insurance products and their integration into the Company's workforce.

The Línea Directa Group has a reporting channel for breaches of the Code of Ethics, the Ethics Channel, which is freely accessible to all Stakeholders and is completely anonymous and confidential. It also has a Harassment Protocol designed to prevent inappropriate situations that could hinder the normal operation of the company and that could lead to workplace harassment, sexual harassment, harassment based on sex, or discriminatory treatment.

In 2025, no cases of non-compliance with the UN Guiding Principles on Business and Human Rights, the ILO Declaration, or the OECD Guidelines relating to consumers or end users in the later stages of the value chain have been identified.

In the event that any Human Rights violations are identified, the Group considers various measures of redress or remuneration, including:

- Offering the alleged victim, if necessary, the necessary medical, psychological and social support, through internal or external means.
- Adoption of precautionary measures, reasonable and proportionate when, due to the seriousness of the reported conduct and the appearance of truthfulness of the evidence provided during the investigation, the instructor considers it appropriate.
- Conclusions reached, reflected in the report of the harassment file, as well as possible mitigating or aggravating circumstances and proposals of possible measures to be taken to neutralize the harassment and/or sanction the conduct constituting it.
- It will be guaranteed at all times that there will be no reprisals against those who report, provide information, or participate in the proceedings, including threats, attempted reprisals, or unfavorable treatment. Consequently, the right to protection is recognized for individuals who report any type of harassment or who are affected by such impacts.

Additionally, starting in 2023, as an organisation adhering to the UN Guiding Principles, Línea Directa submits an annual electronic statement from its Director General expressing its support for the UN Global Compact. Also, since that same year, it has completed the Progress Report questionnaire.

The aforementioned Progress Report was updated in 2025, which adds significant value to the organisation, since:

- Build credibility and brand value by demonstrating your commitment to corporate sustainability, the Ten Principles and the Sustainable Development Goals.
- Measure and demonstrate progress in relation to the Ten Principles, in a consistent and harmonised manner.
- It allows you to receive information, learn, and continuously improve your performance.

### **Ethics Channel Policy.**

Línea Directa has an Ethics Channel Policy, approved by the Board of Directors, to regulate the channels and designated personnel for managing the Ethics Channel and any complaints that may arise through it, as well as the procedure to be followed. Its objective is to allow anyone to report, with due guarantees, any irregularity detected in compliance with the Code of Ethics, or any other breach of current legal regulations, as well as to raise questions about its application.

The Ethics Channel Policy **applies to all informants**, regardless of their stakeholder group. This policy establishes safeguards such as protection against retaliation against whistleblowers.

Both the Ethics Channel and the Ethics Channel Policy are accessible on the Línea Directa Aseguradora corporate website, thus facilitating access.

A more detailed description of the Ethics Channel Policy can be found in chapter ESRS S1 – Own workforce.

## **S4-2. Processes for engaging with consumers and end-users about impacts.**

The Línea Directa Group has established various processes to collaborate with its consumers and end users, ensuring open and effective communication regarding the positive, negative, real, and potential impacts that may affect them, and taking them into account in decisions aimed at managing these issues. Although **no negative impacts materialized** for the aforementioned stakeholder group in 2025, the Group maintains its ongoing commitment, collaborative processes, management practices, and related initiatives.

Some of the channels used to establish this collaboration include customer surveys (NPS and NSS), the call center, social media, the customer app's digital experience, the website's self-service portal, personalized customer service via telephone agents, and mass media. Additionally, to broaden its understanding of the needs of specific groups, such as people with functional diversity, Línea Directa has established contact with various specialized organisations, such as ONCE (Spanish National organisation of the Blind) and the CNSE Foundation. Dialogue and collaboration with the latter foundation has enabled Línea Directa to develop a video call service for vulnerable groups, such as deaf people, implemented in 2024. The CNSE Foundation provides the Group with its sign language interpreters, given the difficulty this group faces in communicating with companies that rely on call centers. The ability to purchase insurance, consult policy terms and conditions, report accidents, or request roadside assistance via video interpretation is a significant benefit for this group, as they can have a real-time conversation with a team of operators specifically dedicated to this service. With this platform, the interpreter translates for the deaf person so that they can carry out their tasks directly, which represents an expansion of their autonomy.

Likewise, the Group provides customers and non-customers with functional diversity with an accessible commercial and corporate website so that they have all the information and the possibility of carrying out transactions with the Group.

One of the main areas involved in customer relations is Customer Quality and Experience, which manages five fundamental expectations: transparency, accessibility through interaction channels, the timing of contract execution, social media support, and omnichannel experience. These expectations are related to Línea Directa 's commitments regarding providing customers with contractual information, prompt responses, adequate service delivery, flexible and agile support through social media profiles, and consistent, positive experiences across all channels. Communication channels include customer surveys (NPS and NSS), the call center, and social media.

On the other hand, the Marketing Department manages customer expectations related to the fulfillment of the product or service offered, differentiated offers tailored to their needs, and the accessibility and clarity of product and service information. The Group's commitments are to promote the best product at the best price for each customer, develop new products and services adapted to customer needs, and provide product and service information through sales channels. These communication channels include the company website and mass media.

The Services and Claims Area manages the expectation of receiving relevant information about the service provided, with the Group's commitment being to keep you informed at the appropriate times through telephone and digital channels.

Some of the communication channels available to customers include the customer app, web self-service, and personalized assistance via telephone agents. In 2024, a video call service was implemented for vulnerable groups such as deaf people.

The Group measures the quality of its service by conducting a customer satisfaction analysis. Likewise, the effectiveness of its customer relations is measured using the Net Promoter Score (NPS), which indicates the likelihood of customers recommending the Company.

While the board of directors is ultimately responsible for approving actions at a strategic level, the CEO, the Steering Committee, and the product committee are responsible for driving and implementing these actions.

With non-customers, Línea Directa identifies, in addition to customer expectations, that the Company adheres to a code of ethics in advertising, to which the Company responds with its commitment to responsible advertising. The channels used are the commercial website, mass media, emails, official notifications, and social media.

As for Consumer Associations, their expectations are to protect the rights of this group, and the Company's commitment is to monitor effective protection in its activity and provide the required information.

In this area, a control procedure and environment are implemented, which is applicable to consumers and their representatives, as well as to end users. This procedure has three phases:

- Each department is responsible for its communication goals, which it monitors monthly, quarterly, semi-annually or annually, depending on the objective.
- The indicators are reported to the Sustainability department every six months with sufficient supporting evidence for potential audits. Subsequently, the report is forwarded to the Sustainability Working Group for review of key issues.
- The Sustainability Committee is presented twice a year, the degree of compliance with the communication goals with the Stakeholders is evaluated and the strategy with the Stakeholders is re-evaluated.

### **S4-3. Processes to remediate negative impacts and channels for consumers and end-users to raise concerns.**

Línea Directa offers various channels for consumers to submit their complaints, claims, and concerns. These include:

- The customer service department, which handles customer complaints and claims, operates completely independently of the Company's business areas. This department guarantees personalized attention to all issues and provides customers with a reasoned response based on contractual clauses, transparency standards, and the protection of their interests.
- Policyholder Ombudsman: Línea Directa has an Advocate, whose decisions are binding on the Company, but this does not preclude the policyholder from appealing. The Policyholder Advocate promotes transparency, protects the policyholder's interests, and promotes the use of best practices.

Complaints or claims are treated confidentially and in accordance with data protection regulations.

## Customer Services department.

The Group addresses, manages, and resolves complaints and claims in accordance with current regulations through an independent Customer Service Department. This ensures the quality of the services and products offered by the Company and promotes customer protection and sound financial practices. The head of the Customer Service Department is appointed by the Board of Directors and reported to the Commissioner for the Defence of Financial Customers and the DGSFP (General Directorate of Insurance and Pension Funds).

To facilitate universal access, support is offered in all official languages via a free telephone line.

The offices open to the public have complaint forms and information signs available. In addition, the company has a Customer Protection Regulation, accessible on its website and in its offices, which details the complaint channels.

The information gathered is periodically shared with the different departments of the Company with the aim of reducing customer complaints and improving satisfaction levels. Línea Directa regularly evaluates the effectiveness of its complaint and resolution channels using indicators such as resolution rates, average response times, and customer satisfaction surveys.

The area includes a department responsible for managing an initial review of customer complaints. The procedure by which customers, before filing a formal complaint or claim, can request to speak with a supervisor is published on the Group's website. The department then contacts the customer to discuss their case individually.

In 2025, there was a downward trend in the number of complaints received throughout the year, highlighting Línea Directa commitment to service quality. Only the number of complaints resolved increased, by 8.02% compared to the previous year (7,131 complaints handled in 2025 compared to 7,753 in 2024). Likewise, the average resolution time decreased to 11.26 days.

| 2024       |        |       | 2025       |        |       |
|------------|--------|-------|------------|--------|-------|
| Complaints | Claims | Total | Complaints | Claims | Total |
| 577        | 7,176  | 7,753 | 506        | 6,625  | 7,131 |

| 2024    |           |       | 2025    |           |       |
|---------|-----------|-------|---------|-----------|-------|
| Founded | Unfounded | Total | Founded | Unfounded | Total |
| 2,556   | 5,197     | 7,753 | 2,152   | 4,979     | 7,131 |

| Area                | 2024       |                       | 2025       |                       |
|---------------------|------------|-----------------------|------------|-----------------------|
|                     | Percentage | Complaints and Claims | Percentage | Complaints and Claims |
| Accident Management | 70.82%     | 5,491                 | 71.36%     | 5,089                 |
| Policy Management   | 16.12%     | 1,250                 | 15.08%     | 1,075                 |
| Quote and close     | 2.08%      | 161                   | 1.92%      | 137                   |
| Additional services | 6.77%      | 525                   | 5.60%      | 399                   |
| Roadside assistance | 3.22%      | 250                   | 3.53%      | 252                   |
| other               | 0.98%      | 76                    | 2.51%      | 179                   |

The direct business model offers numerous competitive advantages: greater alignment capabilities, savings in commissions and branch networks, and direct customer contact. It is precisely this last point that allows Línea Directa to understand policyholders' needs firsthand, which is an extraordinary asset in driving quality across all its processes.

Línea Directa Aseguradora monitors its Net Promoter Score (NPS), which estimates the potential for customers and users to recommend the company. This system uses a scale of 1 to 10 points, with only policyholders who rate their experience with the company 9 or 10 being considered "promoters." In this regard, Línea Directa Aseguradora 's overall NPS in 2025 reached 36.83 points.

In 2025, the consolidation of the Customer Experience strategy has driven a significant increase in NPS by 5.79 points, going from 31.04 to 36.83, with improvements in all areas and key moments of the customer journey.

| NPS  | Global |
|------|--------|
| 2024 | 31.04  |
| 2025 | 36.83  |

The Net Promoter Score (NPS) is an indicator used to measure customer confidence in a company. This indicator was introduced in a 2003 Harvard Business Review article and quickly became a standard.

The NPS calculation is standardized for all companies. The surveys that evaluate Línea Directa are divided into three groups:

- Scores 9 and 10: Promoters. These are people satisfied with the product or service and have a high probability of recommending the brand; in addition, they can be considered loyal customers and brand advocates.
- Scores 7 and 8: neutral. These are people who have a neutral or average opinion of the brand; they are not very likely to recommend the brand and do not have loyalty towards it.
- Scores 0 to 6: Detractors. These are people who are not satisfied with the product or service, are not loyal to the brand, and are very unlikely or not at all likely to recommend it.

The result is not expressed as a percentage but as a value calculated using the formula: (% promoters - % detractors). This calculation is not validated by an external entity.

In addition to the NPS, Línea Directa Aseguradora uses other quality indicators, such as customer satisfaction with its telephone agents. Customers evaluate their satisfaction with the service provided by the company's specialists, with professionalism and the agents' demeanor being the most highly valued aspects. Satisfaction with each service, whether after a call or a digital transaction, is assessed using the Net Satisfaction Score (NSS), which reached 41.05 points in 2025. In 2024, it was 36.18.

The Group has set itself the objective for 2026 of maintaining the positive trend observed in the monthly NSS assessment of the last financial year 2025, in order to consolidate consistent and continuous growth.

Unlike the NPS, the NSS calculation does not follow a standard methodology for all organisations. Therefore, Línea Directa decided to use the same calculation method as the NPS.

### **Activity report of the Policyholder Ombudsman.**

If the insured is not satisfied with the Customer Service Department's decision, they have several options to argue their case and pursue their claim. Línea Directa has an Policyholder Ombudsman, who promotes transparency, protects the insured's interests, and ensures the use of best practices, issuing binding decisions for the Company.

In 2025, a greater number of resolutions were issued than in the previous year, due to the increased number of cases opened. In 2024, the Customer Advocate resolved 684 cases, while in 2025, 711 were resolved.

During 2025, a total of 711 cases were resolved, ending with 165 resolutions favorable to the claimant, 521 unfavorable resolutions, 9 cases closed without resolution, mainly due to duplicate opening, plus another 16 with a statement of non-competence.

In this regard, 684 complaints were resolved through the Customer Advocate in 2024, of which 278 (40.6%) were decided in favor of the customer and 396 (57.9%) in favor of the Company. Of these 278 complaints resolved in favor of the customer, 26 were upheld, 10 (1.5%) remained unresolved, and 252 ended with a settlement, which implies the voluntary recognition of the validity of the complaint and the customer's requests, without the need for the Customer Advocate to issue a ruling against them.

### **Ethics channel and its availability to customers.**

As explained in the ESRS S1 chapter on own workforce, the Group has a Code of Ethics, which aims to establish the general guidelines that should govern the conduct of employees of Línea Directa Aseguradora and its subsidiaries, in the performance of their duties and in their commercial and professional relationships, in accordance with the laws and the ethical principles of the Group.

In this regard, the values set forth in the Code of Ethics form the basis of the commitments made by Línea Directa Aseguradora to its shareholders, partners, customers, suppliers, employees, and society in general. The Group also maintains an Ethics Channel that allows Stakeholders, including customers, to report, with the appropriate safeguards, any irregularities detected in compliance with the Code of Ethics, the Supplier Code of Conduct, or any other breach of applicable law, including the company's relationship with consumers and end users.

Línea Directa has an Ethics Channel Policy so that anyone can report, with due guarantees, any irregularity detected in compliance with the Code of Ethics, or any other breach of current legal regulations, as well as raise questions about its application. This policy establishes guarantees such as no retaliation against the whistleblower.

#### **S4-4. Taking actions on material impacts on consumers and end-users, approaches to managing material risks and pursuing material opportunities related to consumers and end users, and the effectiveness of those actions.**

Although no material impacts on consumers and end users have been identified, the Group has promoted the exploitation of material opportunities related to the supply of specialized products and services, paying special attention to accessibility and addressing the needs of vulnerable groups such as people with functional diversity.

Similarly, efforts have been made to manage the identified risk of potential failure to meet customer expectations regarding service delivery.

No severe Human Rights cases have been identified in relation to consumers, or any other stakeholder group.

#### **Customer-Centric Strategy and establishment of the Quality and Customer Experience department.**

The customer-centric strategy, developed in 2024 and continued in 2025, has led to a significant improvement in overall customer satisfaction. It has successfully strengthened collective awareness of quality and laid the groundwork for impactful customer projects that will have a significant impacts throughout 2026.

The Quality and Customer Experience area, with direct representation on the Steering Committee, has an analytics department that maintains a Voice of the Customer (VOC) program, which monitors customer satisfaction levels at various points of interaction. This VOC program consists of 1 million surveys annually, 85,000 of which are conducted in person by telephone interviewers. The results are continuously analyzed to identify customer moments of truth (MOTs) and moments of pain (MOPs) and to propose improvements that impacts satisfaction. This area allows for more targeted management and promotion of both Positive impact and the prevention, mitigation, and remediation of any negative impacts that may occur for consumers and end users.

In this way, the Company strives to ensure that its practices do not cause or contribute to negative impacts on consumers or end users. It also facilitates the management of related risks and opportunities thanks to its specialized knowledge and close customer relationships.

#### **Product governance, innovation and commitment to vulnerable groups.**

In April 2025, the Company approved its product control and governance policy with the objective of establishing the requirements on control and governance of insurance products designed, developed and marketed by Línea Directa Aseguradora S.A. so that customers have all possible guarantees when taking out insurance.

Thus, in the new product approval phase, it is verified that the goals, interests and characteristics of the customers are taken into account and that no adverse effects are caused to the customers.

In the double materiality exercise, product innovation and the implementation of improvements in accessibility and attention to the needs of vulnerable groups were identified as opportunities, thanks to insurance adapted to their specific needs and characteristics.

To capitalize on these opportunities, Línea Directa has an 'Innovation and New Product' department and has established a 'Product Committee' with representatives from various departments within the company. This committee, in addition to assessing market opportunity and profitability, ensures accessibility and the absence of bias related to individual rights and freedoms. Furthermore, both the department and the committee...

Both the department and the Committee analyze the expectations of customers and potential customers, promoting the launch of products that differentiate themselves from the competition, both in their coverage and in their marketing channels.

Additionally, in 2024 a video interpreting service was launched to improve accessibility for deaf people. This service, which serves customers in sign language, aims to enhance accessibility and service for this community by offering a direct and efficient communication channel with the Company.

The new service allows customers and non-customers with hearing functional diversity to make inquiries related to Línea Directa 's services and products, including advice on insurance contracts, consultation of policy conditions, help when reporting accidents or requesting roadside assistance, among many others.

The service is simple and effective. Users can access the sign language video interpreting platform from the company's website, where they will communicate with Línea Directa via video call with an interpreter from the CNSE Foundation. The interpreter translates the conversation, in real time, into sign language for the deaf person, using a team of Línea Directa operators specifically dedicated to this service.

Likewise, the Company provides customers and non-customers with functional diversity with an accessible commercial and corporate website so that they have all the information and the possibility of carrying out transactions with the Group.

### **Commitment to transparency and data protection.**

As part of its commitment to minimizing negative impacts on consumers, Línea Directa adheres to the UNESPA Guide to Good Practices in Transparency in Insurance Marketing, which addresses the general principles that should govern the marketing of insurance by insurance companies in any sales modality.

During the year 2025, in relation to sanctions in the field of data protection, the Línea Directa Group has suffered a security breach, produced in the environment of a service provider, which has been reported to the Spanish Data Protection Agency, who has reported its filing.

### **Risk management and dependencies.**

Customer-related risk is integrated into the Group's risk management processes, grouped into a specific category, and recorded and monitored according to a proprietary methodology based on the international Committee of Sponsoring Organizations of the Treadway Commission (COSO).

The risk is instantiated and is the responsibility of the various corporate departments, depending on the business processes activated during the contractual relationship with

customers. As with other risks, this one provides a control environment that mitigates its criticality. The implementation of these controls is the responsibility of the business areas, and their monitoring falls to the analysts in the Corporate Risks area, who assess their effectiveness and propose recommendations for improvement.

On the other hand, within the framework of identifying and managing risks associated with external dependencies, Línea Directa places special emphasis on the control and management of its suppliers, given their direct impacts on customer and user satisfaction. During 2024, the Group updated its Outsourcing Policy to ensure compliance with Solvency II and European Digital Operational Resilience Act (DORA) regulations, guaranteeing that operations carried out by third parties, especially those related to business continuity and insurance sector regulations, are managed with the highest standards of control.

Furthermore, a Responsible Procurement Policy is in place, ensuring the selection of suppliers committed to quality, efficiency, and sustainability, and who comply with all applicable regulatory requirements. The Group has also established a new Business Continuity function to prevent and mitigate impacts that could disrupt customer service, guaranteeing that, in the event of adversity, service continuity is maintained and the impacts minimized.

Additionally, Línea Directa regularly monitors customer satisfaction and potential changes in expectations to minimize these risks.

In this way, Línea Directa integrates external evolution into its control of dependencies, protecting both the relationship with suppliers, as well as the expectations and satisfaction of customers, as well as the continuity of service, which helps to minimize risks.

In 2025, the Group has continued with these actions that ensure the minimization of the risks identified in the Double Materiality exercise, reviewed in this exercise.

### **Other measures towards the health and safety of consumers.**

The Group places special emphasis on preventative medicine and promoting healthy lifestyles among its policyholders and the wider community, based on the conviction that prevention is the best way to ensure good health. Therefore, the Group allows its customers to benefit from preventative diagnostic tests even when they are not experiencing any symptoms. Furthermore, the Group promotes its policyholders to adopt **healthy habits**, such as walking at least **10,000 steps daily**, sleeping at least 7 hours a day, and maintaining a **healthy diet**.

These habits result in significant discounts on insurance renewals for customers, which can reach up to 200 euros.

Furthermore, the Línea Directa Group, due to its direct contact with victims of traffic accidents, is acutely aware of this serious social problem which, beyond the statistics, affects real people. For this reason, the Group is committed to promoting road safety for its customers and the communities in which it operates.

Through a blog hosted on the commercial website, it offers advice on responsible driving habits and maintenance tips to promote awareness among its policyholders.

Furthermore, in 2014 he established the Línea Directa Foundation with the aim of contributing to road safety by promoting safe driving practices in order to reduce and, ultimately, eliminate traffic accidents, a scourge that claims the lives of thousands of people every year.

To achieve this ambitious goal, the Línea Directa Foundation carries out important studies, research projects, workshops, courses and conferences, among other actions, always with the common denominator of Road Safety.

The Foundation also promotes the organisation, participation and funding of training, social, Well-being, educational and teaching activities in this field, as well as the awarding of prizes that recognize the contributions made by individuals or institutions in favor of the fight against traffic accidents.

In 2025, the Línea Directa Group launched a public health study entitled "**The Dangers of Digital Self-Diagnosis**". Developed in collaboration with Ruth Castillo-Gualda, PhD in Psychology and expert in Emotional Intelligence, and Dr. Justo Menéndez, a specialist physician with over 30 years of experience and head of the Emergency Department, both professors at Camilo José Cela University (UCJC), the study aimed to analyze the rise of AI use in Spain, its relationship to physical and mental health, and to offer recommendations for using this tool responsibly. In this way, the study promotes the safety and well-being of consumers and potential users of the Group's products and services.

## Metrics and targets

### **S4-5. Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities.**

In relation to consumers, the Company has set itself the objective for 2026 of maintaining the positive trend observed in the monthly NSS evaluation of the last fiscal year 2025, in order to establish consistent growth for 2026.

The effectiveness of the objective will be monitored through the monthly breakdown of the NSS indicator results.

This objective is focused on improving the quality of service and the needs of Stakeholders, although these Stakeholders do not participate directly in defining the objective.

The CEO sets the goals and communicates them to management. While legitimate representatives of consumers and/or end users are not consulted in setting these goals, the results of customer surveys are taken into account. This feedback is used to assess areas for improvement and establish the goals. In this regard, the company's Voice of the Customer (VOC) program monitors customer satisfaction levels at various touchpoints. As mentioned previously, this program consists of approximately 950,000 surveys annually, 100,000 of which are conducted in person by telephone interviewers.

The goals are monitored monthly, and a report is prepared with the same frequency and submitted to the management committee.

As a result of the monitoring, telephone support guides have been developed, new communication channels have been opened via chat, and new self-service functionalities have been developed in the App and web environment.

Employee incentive plans include customer satisfaction indicators as a goal.

The Group has met its 2025 target of maintaining the positive trend observed in the monthly NSS assessment for the last fiscal year, thus consolidating consistent and continuous growth. Details of the indicator's performance are provided in section S4-3: Processes for addressing negative impacts and channels for consumers and end users to express their concerns.

# GOVERNANCE DIMENSION

## Business conduct (ESRS G1)

### Governance

#### GOV-1. The role of the administrative, management and supervisory bodies

The Línea Directa Group's **Code of Ethics**, as well as the **Whistleblower Channel Policy**, the **Compliance Policy**, and the **Integrity Policy**, all related to business conduct, have been approved by the Board of Directors, which, with the support of the Audit and Compliance Committee, oversees and promotes compliance. Furthermore, the Board has appointed an **ethics manager** who reports on the status of compliance with the Code through an Annual Report.

The board members as a whole possess knowledge and experience in business conduct, acquired throughout their professional careers and as members of the Board of Directors of Línea Directa and other companies. In particular, the Audit Committee is responsible for overseeing and promoting compliance with the Code of Ethics, the Supplier Code of Conduct, and the company's internal codes of conduct, a function it performs through the ethics manager's report, which is submitted annually to the committee.

### Impacts, risk and opportunity management

#### IRO-1. Description of the processes to identify and assess material impacts, risks and opportunities related to ethics, good governance and business conduct.

Based on the information reported in section IRO-1 of the General Disclosures chapter (ESRS 2) of this report, and following the stages and evolution of the Double Materiality process of Línea Directa Aseguradora, the criteria used in the process in reference to the impacts, risks and opportunities of corporate conduct are, among others:

- Relationship and alignment of impacts, risks and opportunities with the insurance sector.
- Strategic guidelines on Governance set by the Group.
- The scope of the activities of the Group and its subsidiaries at the national level.
- Consistency with the financial statements and the risk map.

#### G1-1. Corporate culture and policies on business conduct and corporate culture.

The Compliance function is tasked with identifying, assessing, managing, or addressing incidents, risks, and opportunities of notable significance concerning business conduct.

The **Chief Compliance Officer (CCO)** is responsible for managing and directing the Compliance Management System and the Compliance Function. In the event of potential

compliance risks, the CCO and the **Regulatory Compliance Department** will propose appropriate action plans to prevent or mitigate them.

The functions of the Chief Compliance Officer include:

- To report to the Audit and Compliance Committee on compliance with the rules or obligations of positive law that are applicable to the Group and its activities, including not only those derived from relationships with third parties but also those that come from self-imposed rules or sectoral or ethical standards whose compliance is legitimately expected by the Stakeholders of the communities where it operates.
- Act immediately on Compliance risks by informing the Audit and Compliance Committee and proposing appropriate action plans so that they can be implemented quickly to prevent their occurrence or reduce their consequences.
- Inform the organisation of any Standard of which you are aware that may pose a compliance risk, that could significantly affect the Group or its activities, and whose compliance must be observed and its impacts on the organisation assessed.

### **Fostering corporate culture.**

Línea Directa promotes a corporate culture of compliance with legal and ethical standards through the dissemination of the code of ethics, specific training of its employees and its monitoring and compliance system.

The Code of Ethics is the cornerstone of the development of the corporate values that the Group seeks to instill among its members. It establishes, in general terms, the behavioral guidelines and directives in the various professional fields in which Línea Directa employees carry out their work. Its objective is to serve as a general guideline when making decisions in certain situations that these professionals may encounter.

Each year the **Ethics Manager** prepares a report on the level of compliance with the Code of Ethics and the communications received in the **Ethics Channel**, submitting the recommendations he considers appropriate to the Board of Directors.

The Code of Ethics of the Línea Directa Group aims to establish the general principles that should guide the conduct of employees of Línea Directa Aseguradora S.A. and its subsidiaries, in the performance of their duties and in their commercial and professional relationships, in accordance with the law and respecting ethical principles.

It also responds to the obligations to prevent the commission of crimes imposed on companies in the field of criminal liability of legal entities, as well as the general duty of all employees to cooperate in compliance with current laws and the Group's internal regulations.

The Línea Directa Group will promote compliance with this standard through its dissemination, specific training of its employees and its monitoring and compliance system.

All employees of the Group have the obligation to collaborate in the detection of possible breaches of the Code of Ethics, as well as any other internal and legal regulations.

The Línea Directa Group has an Internal Information System, the Ethics Channel, so that anyone can report, with due guarantees, any irregularity detected in compliance with the Code of Ethics, or any other breach of current legal regulations, as well as raise queries about its application. The general principles and procedures applicable to the management of the Ethics Channel are regulated in the **Ethics Channel Policy**. These principles are:

- 1) Confidentiality of the identity of the informant and of any third party mentioned in the communication, as well as the processing of the information and its investigation.
- 2) Prohibition of retaliation.
- 3) Respect for the principle of presumption of innocence and the right to defense of the affected parties.
- 4) Independence, impartiality and absence of conflicts of interest in management.
- 5) Effective processing of communications.
- 6) Accessibility.

Access to the Ethics Channel and its policy, which includes whistleblower protection guarantees, is available on the **corporate website** and the **Group's intranet**. In this regard, Linea Directa Group is subject to and complies with Directive (EU) 2019/1937, as well as with its transposition regulations, specifically Law 2/2023 of February 20, which regulates the protection of individuals who report regulatory infringements and combats corruption.

Beyond these requirements, the Group has established an investigation procedure to address any detected incidents or irregularities, encompassing all conduct that contravenes regulations or the Code of Ethics, not limited to the violations specified in Directive (EU) 2019/1937.

### **Code of Ethics Training.**

The new hires complete an **online training course** through the Code of Ethics module, which includes a specific section on Criminal Liability in the company, with knowledge of the Code of Ethics forming the basis of the crime prevention system of the Línea Directa Group.

This module requires the completion of a **self-assessment test** that allows for a record of the people who carry out the training, ensuring knowledge and understanding of the course content.

Additionally, specific training actions are carried out, for example, on the new supplier code of conduct to those employees who, due to their position, have more contact with suppliers (the latest training sessions occurred in 2023).

Due to its direct, non-life insurance business model, the Group, in its Double Materiality assessment, has not identified corruption and bribery as a material issue. The possibility of such an event occurring is limited to roles that involve decision-making in collaboration with third parties. These roles are susceptible to offers from third parties of various types of personal favors in exchange for influence within the organisation. To address this, Section 7 of the Code of Ethics. "Gifts, presents and hospitality," prohibits Group employees from accepting or offering gifts, favours, services, or any benefits from individuals or entities that could compromise their objectivity or sway commercial, professional, or administrative relationships.

Furthermore, the code includes a section on measures against bribery and corruption, which states that Group employees may not make or offer, directly or indirectly, any payment in cash, in kind or any other benefit, to any person in the service of any entity, public or private, political party, public office or candidate, with the intention of illicitly obtaining or maintaining business or other advantages."

The Criminal Compliance Policy was created to establish the general principles and criteria for action by all members of the organisation regarding the prevention of criminal risks. A special section, included as an Annex, outlines the main criminal risks associated with the Group's activities, detailing what they consist of and how their commission can be prevented, including corruption and bribery.

The Línea Directa Group is firmly committed to respecting all regulations for the prevention of and fight against corruption, as set out in the organisation's Code of Ethics and Anti-Corruption Policy. This commitment extends to all employees of the organisation, its managers and members of the Board of Directors, as well as to all of the Group's Stakeholders.

In 2021, the Group approved an **Anti-Corruption Policy**, which has been updated and replaced by the **Integrity Policy** approved in June 2025. Through this Policy, the Línea Directa Group confirms its commitment to **zero-tolerance** towards any form of corruption and, to this end, develops a series of principles that establish the framework for ensuring strict compliance with regulations on the prevention and fight against fraud and corruption, as well as adherence to the highest standards of integrity in professional activity.

One of the most important measures is the Group's **gift acceptance procedure**, which defines Línea Directa Group's policy regarding gifts and presents from third parties. In this regard, all gifts that do not meet the procedure's requirements are raffled off at the end of the year in a charity market open to all employees.

The Group has not registered any significant allegations of corruption and bribery in either 2025 or 2024.

### **Subcontracting and suppliers.**

In 2022, the Group approved the Responsible Procurement Policy, which stipulates that suppliers will be promoted to define a strategic ESG plan. Additionally, non-financial environmental, social, and governance criteria were incorporated into the supplier evaluation and approval process.

One of the pillars of action of the aforementioned policy consists of contracting suppliers that have developed a socially responsible strategy in the economic, social and environmental fields, aligned with the objective of increasing ESG awareness in the Group's supply chain, provided that the technical, operational and economic requirements of the evaluated offers allow it.

In 2025, Línea Directa Aseguradora placed orders with **576 suppliers** worth 172 million euros in addition to those made to the Group's claims network, compared to payments of 175.8 million euros to 600 suppliers in the previous year.

As a sign of the Línea Directa Group's commitment to the development and growth of the local production network in Spain, **91% of purchases in 2025** were made from local suppliers, maintaining the same percentage as the previous year.

In 2025 the Group has approved 116 new suppliers (compared to 142 in 2024).

This commitment to investing in local purchases by the Group is a driver of growth for the geographical areas in which it operates, promoting their business, industrial and social development by creating jobs in companies that supply products and services.

### **Assessment of suppliers' ESG performance.**

In 2025, the Línea Directa Group continued with the system for the management and evaluation of the **ESG performance of suppliers** that carry out critical operations, throughout their relationship with the Group, resulting in an informative report available to management.

At the close of 2025, 92.7% of the **suppliers** managed by the insurer's **Procurement Department** surveyed this year have been evaluated according to the established sustainability criteria, compared to 87% of suppliers evaluated in the previous year.

Additionally, the performance of 70% of the **Motor claims network** providers evaluated has been analyzed, 11 percentage points higher than the previous year.

In 2025, the ESG questionnaire was continued to be sent to collaborators of the **bodily injury network** of the Services and Claims Area with a 60.7% response rate, compared to 52% responses in 2024.

In addition, the network of suppliers in the home goods sector was also evaluated, with a 94.1% response rate in 2025, compared to 80% in 2024, from the surveyed suppliers. The objective of the ESG supplier assessment is not only to select the suppliers that demonstrate the best sustainability performance but also to motivate them to improve their ESG performance, which, among other aspects, will enhance their competitiveness.

## Regulatory compliance (Entity-specific)

### GOV-1 Role of the administrative, management and supervisory bodies in the undertaking's regulatory compliance.

At Linea Directa Group, risk management, internal control over financial and sustainability information, the actuarial function, and regulatory compliance are integrated into the Corporate Risk Area, which ensures the identification, assessment, mitigation, and review of risks, developing a catalog supported by a technological system that facilitates interaction between the different roles involved in risk management and the control environment, through workflows, reporting tools, and the generation of heat maps.

The control and evaluation functions are distributed among different **lines of defense**:

1. A **first line** of defense responsible for the daily management of risks.
2. A **second line** of defense, led by the **Corporate Risks** area, which manages key functions such as:
  - Risk management and internal control.
  - Actuarial function.
  - Regulatory compliance.
  - Internal control of financial information and fraud.
3. A **third line** of defense, led by the Internal Audit function, embodied in monitoring the effectiveness of the established controls.

Regarding regulatory compliance, specifically, the Línea Directa Group has a **Regulatory Compliance Committee**, made up of the heads of the associates responsible for expert and cross-functional roles within the compliance environment, namely Tax Advisory, Legal Advisory, Occupational Risk Prevention, Corporate Governance, Data Protection Office, and Human Resources. Its function is to support the Regulatory Compliance Department to ensure the proper performance of its duties.

Furthermore, the Línea Directa Group's **Standing Risk Committee** is responsible for facilitating and monitoring the implementation of effective risk management practices within the Group through reporting from frontline staff. It is chaired by the Chief Risk Officer and is made up of the Heads of Internal Control of Financial Information, Data Quality, Risk Management and Internal Control, Regulatory Compliance, and Actuarial Function.

Furthermore, among the functions of the Audit and Compliance Committee, one of the two advisory committees of the Board of Directors, is the supervision and review of the company's regulatory compliance system. This committee is responsible for overseeing the effectiveness of the company's internal control, internal audit, and risk management systems. The committee is informed by the heads of the Internal Audit and Corporate Risk functions (Risk Management and Internal Control, Actuarial Function, Regulatory Compliance Function, and Internal Control and Financial Reporting System) regarding the most significant risks identified in the entity's Risk Map, as well as the status of the recommendations issued and the performance of Key Risk Indicators (KRIs).

The **Risk Management, Actuarial, Regulatory Compliance and Internal Control departments of the ICFR and ICSR** are responsible for:

- To ensure the proper functioning of risk control and management systems and, in particular, to ensure that all significant risks that may affect the company are properly identified, managed and quantified.
- Actively participate in the development of the risk strategy and in important decisions around risk management.
- Ensure that the risk management and control systems adequately mitigate risks within the framework of the policy defined by the Board of Directors.
- Periodically evaluate the adequacy and effectiveness of the controls (understood as measures planned to mitigate the impacts of the identified risks) and make recommendations to those responsible for the risks, which will materialize in action plans.
- Report periodically on the status of the Group's risks, as well as possible risk materialization and the status of all recommendations arising from testing, to the Steering Committee and, as frequently as deemed appropriate, to the Standing Risk Committee.

The **Chief Compliance Officer (CCO)** is responsible for managing and directing the **Compliance Management System and the Compliance Function**. In the event of potential compliance risks, the CCO and the Regulatory Compliance Department will propose appropriate Action Plans to prevent or mitigate them.

The rest of the information reported on governance can be found in section GOV-1 of the chapter relating to ESRS 2.

### **SBM-3. Material impacts, risks and opportunities and their interaction with the strategy and business model.**

The Línea Directa Group, through the double materiality analysis carried out throughout 2024, and updated in 2025, whose methodology is indicated in the ESRS 2 chapter Management of impacts, risks and opportunities, identified a material risk for the Group, as shown in the chapter Description of the processes to determine and evaluate the impacts, risks and opportunities of relative importance related to regulatory compliance.

This risk is related to and linked with its strategy and business model. Among the strategic lines of the Group's Fifth Sustainability Plan 2023-2025 are **ethics, compliance, and risk management**. This line prioritizes ESG action and leads to concrete actions that define the aforementioned Plan.

This line of action continues in the new Sustainability Plan 2026-2028, which defines the strategy for the next three years.

Material risk is linked to meeting the Group's need to ensure regulatory compliance. This involves implementing controls, policies, and processes to comply with the various regulations that apply, thereby reducing the reputational and financial risk that non-compliance could trigger. In this regard, the Group has awareness and training programs and policies such as the Compliance Policy, which aims to regulate the operation and exercise of this key function required by insurance regulations stemming from Solvency II. This policy also demonstrates the Línea Directa Group's commitment to respecting and complying with regulations, as well as its rejection of any breach of applicable regulations and conduct contrary to the Code of Ethics, and its commitment to zero-tolerance for any type of criminal conduct. To this end, the Group defines a framework of compliance principles, which all employees and third-party collaborators must adhere to through compliance with the Supplier Code of Conduct.

## **IRO-1 Description of the processes to identify and assess material impacts, risks, and opportunities related to regulatory compliance.**

As has been developed in greater detail in chapter ESRS 2 Impacts, risks and opportunities management, in 2024 the following process was followed for the assessment of impacts, risks and opportunities:

1. Firstly, a context analysis was carried out, using both internal and external sources of information, to obtain a first approximation of potentially material issues from a cross-cutting sustainability perspective.
2. Secondly, a preliminary identification of the topics and Sub-topics was carried out, defined from the list of Topics, Sub-topics and Sub-sub-topics proposed in ESRS 1 AR 16 and from the previous material of the Group.
3. Thirdly, the Impacts, Risks and Opportunities (IROs) have been identified, examining and considering the information present in the sources used in the first phase of the project.
4. Fourthly, based on the quantitative data that has been given to each IRO, the consultations carried out with the different Stakeholders and the Group's management framework, the materiality value of each of them was obtained.
5. Finally, the material themes have been obtained, identifying 11 material environmental, social and governance (ESG) issues.

| Sub-topic             | Sub-topic linked to ESRS | Positive / Negative Risk / Opportunity | IRO description                                           | Value chain                                           |
|-----------------------|--------------------------|----------------------------------------|-----------------------------------------------------------|-------------------------------------------------------|
| Regulatory compliance | Entity-specific          | Risk                                   | Regulatory shifts impacting the organisation economically | Upstream – Shareholders / Investors<br>Own Operations |

After analyzing the Group's management framework and the probability of occurrence of the risk in the short, medium and long term, it has been considered material as a result of the double materiality analysis whose methodology is described in greater detail in chapter ESRS 2 Impacts, risks and opportunities management.

During the analysis, it was identified that this risk has a direct impact on shareholders and investors, corresponding to the upstream value chain and on the company's own operations.

Furthermore, it is important to highlight that for the assessment of the IROs, consultations with four of the main Stakeholders for the Línea Directa Group have been taken into account through their participation in surveys and, in a complementary manner, focus groups have been carried out with the employees of the Group, as well as interviews with members of the management of Línea Directa Aseguradora.

The purpose of these surveys was to incorporate the opinion of the Stakeholders in the assessment of the topics and Sub-topics and to be able to obtain a more comprehensive result.

In 2025, the Sustainability Working Group was consulted to update the Double Materiality exercise. This consultation concluded that the Impacts, Risks, and Opportunities identified the previous year, as well as the same material themes and sub-themes, should remain

unchanged. The results of the updated Double Materiality exercise were submitted to the Sustainability Committee for approval.

## **MDR-P. Policies adopted to manage sustainability matters.**

### **Policies for addressing regulatory compliance.**

#### **Línea Directa Group Compliance Policy.**

The Línea Directa Group maintains a Compliance Policy, applicable to all employees, managers, and directors of all companies within the Línea Directa Group, as well as the **Línea Directa Foundation**. Furthermore, the Group promotes its collaborators and other individuals involved in its operations, products, and services to also adhere to the provisions of this policy.

As previously stated, the main objective of the Compliance Policy is to regulate the operation and exercise of this key function required by insurance regulations stemming from Solvency II, and to demonstrate the Línea Directa Group's commitment to respecting and complying with the regulations, as well as its rejection of any breach of applicable regulations and conduct contrary to the Code of Ethics, and its commitment to zero-tolerance for any type of criminal conduct. To this end, it defines a framework of Compliance principles, which all employees and third-party collaborators must adhere to through compliance with the Supplier Code of Conduct. For these purposes, a Compliance Function has been implemented within the organisation to identify, assess, manage, and control regulatory risks, along with measures to help prevent and mitigate them.

#### **The Compliance Function encompasses:**

- Advising business lines by providing guidelines to help define their legal risk management strategy, ensuring compliance with rules and policies derived from positive law. This activity also extends to self-imposed rules or sectoral or ethical standards whose compliance is legitimately expected by Stakeholders in the communities where the company operates.
- The assessment of the potential repercussions of any changes in the legal environment on the company's operations.
- The determination and assessment of compliance risk.
- The management of the Criminal Compliance System.
- Promoting a culture of regulatory compliance.
- Training in the field of Regulatory Compliance.

Línea Directa Aseguradora S.A. has established a Regulatory Compliance Function (hereinafter RCF) documented by:

- The Compliance Policy.
- The Criminal Compliance Policy.
- The Compliance Management System.

The RCF will be led by the **Chief Compliance Officer (CCO)**, and will carry out its functions with the collaboration of both the Compliance Committee and the Standing Risk Committee, and will report to the Audit and Compliance Committee through the Director of Corporate Risks.

When the Chief Compliance Officer becomes aware of a potential compliance risk, they will immediately propose to the Audit Committee (through the Director of Corporate Risks) the necessary actions to prevent compliance risks or mitigate their effects. From a disciplinary perspective, these decisions and actions will be adopted by the competent department and will be proportionate to the potential or actual harm of the non-compliance. They will be applied with equal force in similar cases, regardless of the hierarchy or position of the person or persons who caused them.

This policy has been approved by the Board of Directors at the proposal of the Audit and Compliance Committee, in accordance with the provisions of the Regulations of the Board of Directors of Línea Directa Aseguradora S.A. and is aligned with its strategic goals, therefore requiring the commitment not only of the Senior Management but also of each and every person who is part of the Group.

The content of this policy will be reviewed annually, and any changes or modifications deemed necessary will be made. When, as a result of the review, this policy needs to be modified, it will be submitted to the Board of Directors for approval and given appropriate publicity. The policy is available on the Company's intranet.

### **Línea Directa Group's Criminal Compliance Policy.**

The **Criminal Compliance Policy** applies to all companies that at any given time comprise the "Línea Directa Group" together with the Línea Directa Foundation. It also applies to all employees, senior management, corporate bodies, and subsidiaries of the companies that make up the Línea Directa Group.

In December 2010, Organic Law 1/2010, amending the Penal Code (referred to as the "PC"), came into force, introducing for the first time into the Spanish legal system the criminal liability of legal entities. This significant development was subsequently consolidated by Organic Law 1/2015, which entered into force on July 1, 2015. This law further defined the criminal liability of legal entities, which had already been established in the 2010 reform, such that a company can be held criminally liable for a crime committed within the organisation by its employees, directors, and corporate bodies. Furthermore, the PC stipulates that a legal entity will be exempt from liability if it is demonstrated that the Group adopted and effectively implemented, prior to the commission of the crime, organisational and control models that include appropriate monitoring and control measures.

The policy was created with the objective of establishing the general principles and criteria for action of all members of the organisation in matters of criminal risk prevention.

The main purposes of this Policy include:

- Description and strengthening of the system of rules of action and behavior that regulate the activity of the entire organisation.
- The establishment of the necessary control elements for the prevention of crime, within the scope contemplated in this document.
- Reform the firm commitment of zero-tolerance to crime of the Board of Directors of Línea Directa Aseguradora S.A. and extend this requirement to the entire organisation.
- To guarantee to third parties that the legally required control is exercised over the entire organisation in relation to its activity.
-

## Artificial Intelligence Governance Policy

In the digital age, **Artificial Intelligence** (“AI”) has become an essential tool for innovation and business growth. However, the responsible and ethical use of these technologies is crucial to ensuring that AI does not compromise fundamental rights or the safety of individuals.

The Línea Directa Group (hereinafter, “Línea Directa”) must commit to strictly complying with the principles and requirements established by **AI regulations** (e.g., the EU AI Regulation), which implies implementing AI systems that adhere to acceptable risk levels and minimizing any potential bias or discrimination. In addition to complying with current legal regulations, Línea Directa must recognize the importance of promoting the ethical use of AI, ensuring that all AI systems developed or used within the organisation align with the established principles and values regarding the ethical use of AI, such as transparency, fairness, and security.

In 2025, the General Secretariat, together with the Technology, Cybersecurity, Risk, and Technical departments, developed the Artificial Intelligence Governance Policy, which was approved by the Board of Directors. This policy establishes Línea Directa 's internal guidelines for the development and responsible use of AI systems, committing the organisation to designing systems that are not only technically sound but also respect the rights and freedoms of all individuals affected by their use.

The purpose of this Policy is to ensure the responsible, ethical, and transparent use of AI systems within the organisation, in compliance with national and international regulations. The specific goals to be achieved are:

- **Regulatory compliance:** ensuring that all AI-related activities (in all phases of its previously mentioned lifecycle) comply with current AI regulations, including standards and risk categorization associated with AI systems.
- **Promoting ethical and responsible use of AI:** Promoting the use and development of AI in a way that respects Human Rights, is fair, and does not reproduce or amplify bias or discrimination.
- **Risk classification:** Implement a risk classification system to assess and manage the potential negative impacts of AI systems. High-risk systems will be prioritized, ensuring that the necessary security and monitoring measures are in place to minimize risks to users and society.
- **Privacy and Security Protection:** ensuring that all AI systems that handle personal data comply with privacy regulations, such as the GDPR, and take the necessary steps to protect information security.
- **Ongoing training:** Provide all employees and Stakeholders with the necessary training on the responsible use of AI, ensuring they are aware of best practices and current regulations. Ensure all Stakeholders understand their role and the implications of AI use.

This policy applies to all employees, managers, and directors of all companies within the Línea Directa Group, as well as to the Línea Directa Foundation, in accordance with applicable regulations. The Company will also promote the understanding of its suppliers and other Stakeholders involved in the design, development, implementation, monitoring, or use of AI systems within the organisation, ensuring they understand their responsibilities and align with the principles established in the context of Responsible AI.

AI providers must meet a series of technical requirements and quality standards to ensure their systems are aligned with Línea Directa 's goals and policies. Línea Directa will only

contract with providers who commit to complying with the principles outlined in this policy, which will be applied according to the principle of proportionality.

The policy defines the **RAI's operating principles and the ethical values** of the Línea Directa Group.

Additionally, the Línea Directa Group has a series of fundamental rules and pillars included in the Code of Ethics, applicable to all personnel including senior management, on which the most specific criminal risk control system is structured and developed.

The **crime prevention model** of the Línea Directa Group is based on the following internal bodies and functions:

- **Board of Directors:** the body responsible for promoting a preventive culture based on the principle of “zero-tolerance” to criminal acts, and which has the responsibility of adopting and implementing the effective monitoring and control model for the prevention of all of this within the Línea Directa Group.
- **Audit and Compliance Committee:** the highest authority responsible for the supervision and control of this policy. In this capacity, the Audit Committee is responsible for approving this policy and for designating the supervision of its operation and compliance to an internal body of the Group, namely the Regulatory Compliance Department, which will keep the Audit and Compliance Committee informed of the decisions and/or measures adopted within the framework of its supervisory, monitoring, and control functions for this policy.
- **Regulatory Compliance Department:** a team with initiative and responsible control to ensure the correct functioning and compliance of the policy and that it is adapted at all times to the needs and circumstances of the companies that make up the Línea Directa Group.
- **Regulatory Compliance Team:** internal body that supports the Regulatory Compliance Department to ensure the proper performance of its functions in the area of criminal risk prevention.
- **People, Communication and Sustainability Area:** for the coordination and management of internal employee training and the application of the disciplinary system in the event of violations of this policy.

The Línea Directa Group has a wide range of fundamental internal policies, procedures and rules that make up a complete set of preventive tools or controls that help minimize the risks of crimes being committed by employees and managers of the Group.

Anyone associated with the Línea Directa Group has the obligation to respect and comply with current legislation, as well as the rules, policies and internal procedures implemented by the Group that are applicable within the framework of the development of their functions.

Failure to comply with these obligations will result in the application of the disciplinary regime established in labor legislation, the applicable Collective Bargaining Agreement, and, where appropriate, as agreed upon by the Audit and Compliance Committee at the proposal of the People, Communications, and Sustainability Department. This is without prejudice to any other liabilities that may arise.

The Línea Directa Group is firmly committed to ensuring that all its employees are aware of the ethical and integrity code of conduct adopted by the Group and how these goals are to be achieved, as well as the duty of all employees to cooperate with the Compliance Department. Therefore, the implementation of this policy must be accompanied by its appropriate internal

dissemination through communication, information, awareness, and training campaigns for all employees regarding criminal risks. This training will be managed by the Compliance Department in coordination with the People Training Department. The frequency of these communication campaigns will be determined by the findings from the criminal risk assessment process.

The policy is available on the Company's intranet.

## **MDR-A. Actions and resources in relation to material sustainability matters.**

### **Actions and resources related to regulatory compliance.**

Increased regulatory pressure is forcing Línea Directa to comply with the requirements and restrictions stemming from new laws, as well as adapt its processes and systems and strengthen its legal teams. In this regard, anticipated regulatory changes in the areas of sustainability and climate change could have a significant impacts on businesses.

Línea Directa has implemented several measures to mitigate this risk. Firstly, it maintains a newsletter of regulatory and jurisprudential developments, which includes draft regulations, relevant rulings issued by major supervisors, and other news of significance that may affect or be of interest to the company. In addition, the management team is promptly informed of changes and their potential impacts on the company, and awareness programs are provided to the entire organisation regarding new regulations and the risks they may entail.

The Group also has other tools, such as the regulatory radar, which analyzes changes in regulations and their potential impacts, helping to promote the implementation of actions that ensure the inclusion of these changes in processes and operations.

### **Main milestones of 2025.**

During 2025, the testing process of the new **Function Map** designed in 2024 was completed, so that there is now an assessment of the residual (or real) risk of the entire regulatory control environment of the entity.

To this end, **90 controls were tested** throughout the year (60 pending from 2024 and 30 newly created). Weaknesses were detected in 34 of these controls (37%), of which 22 were resolved during the current fiscal year, leaving only 12 pending (13% of total controls).

The following were tested during the review:

- Occupational Risk Protection in subsidiaries (CAR and Assistance)
- The fiscal risk in the organisation as a whole, focusing the scope on confirming that controls exist and are correctly applied by the Tax Department regarding the planning, calculation, settlement and accounting of taxes.
- The measures incorporated into the Brand Map, developed in 2024, with the purpose of verifying the commitments of the License agreement.
- The outsourcing process, under the requirements of DORA, as well as the adaptation of internal regulations to what is required by this regulation.
- The controls of the new Artificial Intelligence Map, derived from the RIA.

The implementation of the Artificial Intelligence Governance System has been coordinated from Regulatory Compliance, focusing on the review of the organisation's AI project inventory, the elimination of unacceptable risk practices, and the in-depth analysis of some of them, according to the AI Principles and Ethical Use Policy, the main internal regulation in this area.

For these purposes, the RAI Group has been formed, with representation from the General Secretariat, Technology, IT, Technical and Risk areas, as specialists in the different subjects to be evaluated.

The **RAI Group** has the following competencies:

- **Systems Inventory:** Identify, register and maintain a catalog of all AI systems used in the Línea Directa Group.
- **Risk Assessment:** Analyze the potential negative impacts that the development and use of AI systems may have in terms of security, fundamental rights, privacy, and regulatory compliance. This competency also includes classifying AI systems into the different risk levels defined by the EU AI Act.
- **Continuous monitoring:** Implement and manage a system for the constant monitoring of AI systems once deployed to ensure they operate safely, ethically, and in accordance with established regulations.
- **Establish AI framework processes:** Design and develop a set of procedures that guide the life cycle of AI systems, which involves defining key stages (from identifying AI opportunities to implementation and continuous monitoring) – including corresponding roles and responsibilities, checkpoints, and an approach that fosters ethics.

It also carries out the following activities:

- **Coordination of the AI governance framework:** Establish a governance structure that ensures the responsible use of AI in Línea Directa, following the frameworks, procedures and capabilities defined in this document.
- **Social impacts monitoring and risk management:** Monitor the impacts of AI on users and develop a risk matrix that prioritizes ethical, legal, and reputational aspects.
- **Responsible AI training:** Empowering employees and managers on ethical and regulatory AI principles, and keeping senior management up to date with best practices and regulations
- **Responsible for the risk level of AI systems:** certifying an associated risk level and therefore, it will result from the decisions to be made (feasibility, implementation and monitoring)

Internal Fraud management has been assumed by Regulatory Compliance in the current fiscal year, and a new Map has been developed to articulate this responsibility.

The control framework of the **Data Protection Map** has been verified, in relation to those Risks with a moderate or high residual value, in order to be able to convey an updated vision to the organisation.

The implementation of the **AI Governance System** has been coordinated from Regulatory Compliance, focusing on the review of the organisation's AI project inventory, ruling out

unacceptable risk practices and in-depth analysis of some of them, according to the AI Principles and Ethical Use Policy, the main internal regulation in this area.

## Metrics and targets

### **MDR-M. Metrics in relation to material sustainability matters as regards quantitative indicators from other reporting frameworks.**

The metrics that allow the evaluation of the material risk management strategy of a regulatory change having an economic impacts on the group's activities are developed in the previous section, and are aligned with other reporting frameworks such as the DORA Directive or the Artificial Intelligence Directive.

### **MDR-T. Monitoring the effectiveness of policies and actions through targets.**

The Línea Directa Group has established a rigorous and structured framework for monitoring the effectiveness of its regulatory compliance policies and actions. This is achieved by defining annual goals aligned with the corporate strategy and priorities set by the Board of Directors. This system ensures that initiatives are aligned with the annual strategic goals established by the Board of Directors, overseen by the Regulatory Compliance Committee, and supported by key performance indicators (KPIs).

### **2026 Goals: Challenges and priorities.**

A comprehensive review of the Regulatory Compliance Map will be conducted. The Digital Transformation area, which was extensively reviewed in 2025, will not be included in next year's campaigns. The review strategy will be as follows:

- Controls that, in expert judgment, require in-depth testing will be identified and implemented. This assessment will depend on recent regulatory changes, previously identified weaknesses in the control environment, or the significance of the measure.
- For the remaining controls, a self-assessment campaign will be carried out, proceeding to review in depth those unsatisfactory environments.
- As a general rule, the controls tested in 2025 will not be tested again in 2026.

The 2026 plan is divided into different campaigns throughout the year, with periods for requesting evidence and evaluating effectiveness. Information will be requested from the following areas: IT (January), Finance (February), Sales and Accounts Receivable (March), Technical (May), Health and Safety and Human Resources (July), General Secretariat and Marketing (September), and Quality and Customer Experience (October).

In addition, the internal Fraud Map prepared in 2025 will be tested.

The costs associated with the actions carried out in 2024 have been fully covered by Línea Directa Aseguradora's own resources.

These goals are monitored systematically, with regular reviews that ensure the effectiveness of compliance policies and actions, while also facilitating the identification of opportunities for improvement and the implementation of corrective measures when necessary. This methodology strengthens the Group's ability to anticipate and proactively respond to the challenges of the business and regulatory environment.

## Risk management (Entity-specific)

### Governance

#### **GOV-1. The role of the administrative, management and supervisory bodies.**

Risk management and control governance at the Línea Directa Group is structured according to the principles of independence and segregation of duties, ensuring a clear distinction between business units and the units responsible for risk monitoring and control. The key roles and responsibilities of the governing bodies and Stakeholders involved in the process are described below:

##### **Board of Directors.**

The Board of Directors is the highest body responsible for defining the Group's General Risk Policy, which establishes the overall framework for managing the risks to which it is exposed. This framework serves as the basis for developing specific policies for each type of risk.

##### **Audit and Compliance Committee.**

The Audit and Compliance Committee's mission is to oversee the effectiveness of the internal control system, internal audit, and risk management systems.

The committee is responsible for receiving regular reports from the Risk Management and Internal Audit departments regarding the most significant risks identified in the Risk Map, the status of issued recommendations, and the evolution of Key Risk Indicators (KRIs). It also evaluates and ensures the proper implementation of control measures that strengthen the Group's sustainability and stability.

##### **Internal Audit Function.**

As the third line of defense in the Three Lines Model, the Internal Audit Function is intended to protect and enhance the value of the organisation by providing objective assurance and risk-based advice while collaborating with the Board of Directors and Executive Management in protecting the organisation's assets, reputation, and shareholder interests, thereby contributing to the organisation's sustainability.

##### **Risk Management Functions.**

The second line of defense is performed by the Risk Management Functions, responsible for:

- To ensure the identification, management and appropriate quantification of risks relevant to the company, in accordance with the General Risk Policy.
- Participate in the development of the risk strategy and support key decisions related to its management.
- Monitor the effectiveness of control systems and propose recommendations to mitigate risks within the framework defined by the Board of Directors.
- Prepare periodic reports on the status of risks, the effectiveness of controls and recommendations derived from the tests carried out.

##### **Standing Risk Committee**

This committee plays a crucial role in the implementation and monitoring of effective risk management practices. Its responsibilities include overseeing all risks relevant to the Group,

reviewing regular reports from the front line of defense, and ensuring the integration and consistency of risk control strategies with corporate goals.

### **Senior Management.**

Senior Management is responsible for promoting an effective risk management culture through the establishment of an appropriate organisational structure that facilitates the integration of risk management into daily operations.

Additionally, he is responsible for the active management of risks associated with business and support areas, ensuring the implementation of effective measures to mitigate them.

Business and Support Area Directors must be aware of the risks in their area of responsibility and manage them in an integrated manner with their functions, skills and responsibilities, as well as implement the necessary measures for their management.

The Corporate Risk Management Department coordinates the functions of the second line of defense (Risk Management, Actuarial, Regulatory Compliance, ICFR, ICSR and Fraud Management) and channels the reporting of these to the Group's governing bodies.

The first line of defense, comprised of the Business and Support Areas, is responsible for identifying and reporting any risks that may arise during their operations to the Permanent Risk Committee and managing these risks in coordination with the Risk Management Department. Their mission is to implement effective controls and manage risks in their daily operations, ensuring that the organisation's goals are met and that operations are carried out efficiently in compliance with legal, regulatory, and ethical standards.

### **Information and control systems.**

Risk management functions are equipped with advanced information systems and appropriate controls that ensure policy implementation and alignment with corporate goals. These tools are detailed in specific policies designed for each type of risk.

Regarding the composition and diversity of the members of the various governing bodies, and their capabilities and expertise in this area, this information is reflected in Chapter ESRS 2, Governance. Furthermore, the governing bodies monitor the establishment of targets related to material issues, risks, and opportunities and track progress toward achieving them, as detailed in subchapter MDR-P Policies adopted to manage material sustainability issues.

This comprehensive governance approach strengthens Línea Directa 's ability to identify, control and mitigate risks, contributing to the Group's sustainability and stability.

## **Strategy**

### **SBM-3. Material impacts, risks and opportunities and their interaction with strategy and business model.**

Línea Directa Aseguradora, through the double materiality analysis carried out throughout 2024, and updated in 2025, whose methodology is indicated in chapter ESRS 2 "Impact, risk and opportunity management", has identified as material the risk related to the inadequate development of strategies and action plans for the management and prevention of unidentified environmental, social and governance (ESG) risks, as shown in subchapter IRO-1 Description

of the processes to determine and evaluate impacts, risks and opportunities of relative importance related to risk management.

This approach aligns with the Group's commitment to ensuring an efficient control environment that supports long-term sustainability, as detailed below.

### **Strategic objective in risk management.**

The primary goal of the Risk Management Function is to maintain a comprehensive and up-to-date risk map that identifies current and emerging risks to which the Group is exposed. This map ensures an efficient control environment that ideally mitigates at least 80% of inherent risk, with the progressive aim of approaching levels close to 100%. While achieving total mitigation is not feasible due to the associated costs, the goal is to maximize the effectiveness of the control environment by periodically evaluating it to ensure its adequacy and relevance.

An optimal level of mitigation involves not only having effective controls in place, but also reviewing them comprehensively at reasonable intervals, typically on a biennial cycle. This ensures that the actual risk exposure remains up-to-date and aligned with the organisation's strategic needs.

### **ESG Risk Map.**

The Línea Directa Group's ESG risk map is structured around three main axes encompassing five essential ESG areas. These areas are divided into 16 specific categories representing different risk events:

1. **Environment:** includes risks related to climate change.
2. **Employees, customers and community:** risks linked to interaction with key Stakeholders.
3. **Corporate governance:** considers aspects related to ethics, transparency and third-party relationships.

All these risks are linked to the Sustainable Development Goals (SDGs) and other relevant reporting frameworks, such as the GRI Standards and the Non-Financial Reporting Act (Law 11/2018).

### **Monitoring with Key Risk Indicators (KRIs)**

The Group monitors Key Risk Indicators (KRIs) monthly to assess potential deviations from the thresholds established by the Audit and Compliance Committee. These indicators are characterized by:

- **Measurable and specific:** they ensure an objective assessment of risks.
- **Periodic and relevant:** they guarantee constant analysis aligned with strategic goals.
- **Predictive:** they allow you to anticipate risks before they materialize.

The Key Risk Indicators (KRIs) Dashboard classifies indicators into two levels based on their relevance. This approach helps prioritize key risks and prevents the loss of critical information for decision-making by governing bodies. Furthermore, the closer a KRI is to the root cause

of a risk event, the greater the Group's ability to take proactive measures and mitigate the consequences of that event.

### Integration with the business strategy.

Línea Directa's risk management model is designed to strengthen its corporate strategy by promoting a balance between risk mitigation, opportunity identification, and compliance with ESG standards. This approach not only reinforces the Group's sustainability but also ensures that strategic decisions are based on a deep and up-to-date understanding of the risks to which the organisation is exposed.

## Impacts, risk and opportunity management

### IRO-1. Description of processes to identify and assess material risk management-related impacts, risks and opportunities.

As described in greater detail in chapter ESRS 2 Impacts, risks and opportunities management, the following process was followed in 2024 for the assessment of impacts, risks and opportunities:

1. First, a context analysis was carried out, using both internal and external sources of information, from which a first approximation of potentially material issues was obtained from a cross-cutting sustainability perspective.
2. Secondly, a preliminary identification of the topics and Sub-topics was carried out, defined from the list of Topics, Sub-topics and Sub-sub-topics proposed in ESRS 1 AR 16 and from the previous material of the Group.
3. Thirdly, the Impacts, Risks and Opportunities (IROs) were identified, examining and considering the information present in the sources used in the first phase of the project.
4. Fourthly, based on the quantitative data provided to each IRO, the consultations carried out with the different Stakeholders and the Group's management framework, the materiality value of each of them has been obtained.
5. Finally, the material themes were obtained, identifying 11 material environmental, social and governance (ESG) issues.

| Sub-topic                             | Sub-topic linked to ESRS | Positive / Negative Risk / Opportunity | IRO Description                                                                                                                         | Value chain    |
|---------------------------------------|--------------------------|----------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Management of Financial and ESG risks | Entity-specific          | Risk                                   | Insufficient formulation of strategies and action plans to address and prevent unidentified environmental, social, and governance risks | Own operations |

After analyzing the Group's management framework and the probability of the risk occurring in the short-, medium-, and long-term, it has been deemed material as a result of the Double Materiality analysis, the methodology of which is described in greater detail in chapter ESRS 2, Impact, Risk, and Opportunity Management. The analysis has determined that this risk has a significant impact on the Group's own operations.

Furthermore, it is important to highlight that for the assessment of the IROs, consultations with four of the main Stakeholders for Línea Directa have been taken into account through their

participation in surveys and, in a complementary manner, focus groups have been carried out with the employees of the Group, as well as interviews with members of the management of Línea Directa Aseguradora.

The objective of these surveys was to incorporate the opinion of the Stakeholders in the assessment of the topics and Sub-topics and to be able to obtain a more comprehensive result.

### **Double Materiality update.**

During 2025, the Sustainability department conducted a consultation with the Sustainability Working Group, asking participants about the Impacts, Risks and Opportunities identified in 2024, their review, and the possibility of removing or adding any additional material issues for the Company.

The result of that consultation has been the maintenance of the initially proposed IROs and material issues.

The list of IROs and material issues for 2025 has been submitted and approved by the Sustainability Committee in December.

In that same Sustainability Committee, the VI Sustainability Plan 2026-2028 was approved, which defines the Sustainability roadmap for the next three years.

In the governance area of the aforementioned Plan, the following strategic actions have been defined, among others:

- The completion and updating in 2026 of the full double materiality exercise, considering the new possible legal requirements for application.
- The update of the map and commitments with the Company's Stakeholders, which will serve as input information for the future Double Materiality analysis.

New risks arising from the full assessment of the Double Materiality exercise will be included within the company's ESG risk map

### **MDR-P. Policies adopted to manage material sustainability matters.**

Risk management at the Línea Directa Group is based on the **General Risk Policy**, a framework document approved by the Board of Directors that defines the principles and guidelines for identifying, measuring, managing, and controlling risks that may affect the Group's activities. This policy was reviewed in 2025 to ensure its alignment with strategic goals and business sustainability.

The primary purpose of this policy is to establish a comprehensive approach to risk management, ensuring a control environment that effectively mitigates the threats to which the Group is exposed. Risk management is conceived as a shared responsibility at all levels of the organisation, from employees to governing bodies, promoting a proactive culture that fosters the early identification and effective treatment of risks.

The principles contained in this policy apply to all employees, managers and administrators of all companies that make up the Línea Directa Group, under the terms provided for in the applicable regulations.

Taking into account the characteristics and unique features of their own business, subsidiary companies must adopt the Group's General Risk Policy and implement the necessary control systems to ensure compliance.

The policy adheres to several fundamental principles. These include independence, which guarantees the segregation of duties between business units and monitoring and control units; comprehensive risk management, which enables the identification and treatment of all significant risks through a Risk Map; and transparency, which ensures effective communication for the early detection of threats. Furthermore, the policy is geared towards continuous review, incorporating improvements based on new tools, reported impacts, and industry best practices, and prioritizes regulatory compliance, ensuring that all activities are conducted in accordance with established ethical and regulatory standards.

The General Risk Policy is complemented by internal documents and specific policies that address particular risk categories, corporate functions, and business units. Among the most relevant are:

- The Criminal Compliance Policy: Ensures the adoption of measures to prevent and mitigate legal and compliance risks.
- The Operational and Reputational Risk Management Policy: Ensures the identification and mitigation of risks arising from processes, systems, and external relationships.
- The Policy for the management of technological risks, information security and cybersecurity: Establishes the basic principles and a framework for action in Línea Directa for the management of ICT risks and to carry out adequate monitoring of risks within the IT scope of the Línea Directa Group.
- The Internal Control over Sustainability Reporting Policy (ICSR): Establishes mechanisms to ensure the reliability of Non-Financial Information.
- The Product Governance Policy: Oversees the creation and marketing of products that meet ethical and quality standards.
- The Investment and Reinsurance Policy: Provides guidelines on asset management and reinsurance operations to minimize financial exposure.
- The Actuarial Function Policy: Represents the organisation's commitment to the set of rules and procedures whose application guarantees the correct management of underwriting, reinsurance and technical provision calculation risks.

Each of these policies establishes specific measures and procedures that reinforce the comprehensive management of risks and ensure consistency with the Group's strategic goals.

### **Responsibility of the governing bodies.**

The implementation and monitoring of the policy are the responsibility of various bodies and functions:

- Board of Directors: Establishes risk tolerance limits and approves general and specific policies.
- Audit and Compliance Committee: Monitors the effectiveness of the risk management system.
- Standing Risk Committee: Monitors the implementation of risk management practices and key risk indicators (KRIs).

- Senior Management and Business Areas: Ensure the correct identification and management of risks in their respective areas.

The policy is reviewed periodically to ensure its alignment with emerging risks and industry best practices. At the operational level, Senior Management and Business Units are responsible for ensuring that risks are properly identified and managed within their respective areas, guaranteeing that implemented measures comply with the principles established in the policy. Furthermore, the Risk Map, together with the annual internal risk and solvency assessment reports (ORSA), serves as a key tool for identifying and prioritizing the most relevant risks, facilitating strategic decision-making.

This policy, which came into effect after its approval by the Board of Directors on July 20, 2023 and was reviewed on September 24, 2024, reflects the commitment of the Línea Directa Group to robust risk management aligned with the most demanding ethical and regulatory standards.

### **MDR-A. Actions and resources in relation to material sustainability matters.**

The Línea Directa Group faces various risks inherent to its activities and businesses, as well as external factors that may affect the achievement of its strategic goals. To ensure effective and controlled management of these risks, the Group has established a comprehensive approach based on fundamental principles that govern all its risk management activities.

One of the essential pillars is the **embedding of risk management** at all levels of the organisation. This means that every decision made within the Group must incorporate consideration of the associated risks, fostering an organisational culture in which risk management is an intrinsic part of the responsibilities of every area and employee.

In line with this principle, **operational independence** ensures proper segregation of duties between business units and those responsible for monitoring and controlling risks. Furthermore, coordination mechanisms are promoted to guarantee that decisions and strategies are implemented consistently with established control goals.

Comprehensive risk management is another cornerstone of the risk approach. Each entity within the Línea Directa Group identifies, measures, manages, and controls all significant risks, using tools such as the **Risk Map**, which provides a global **overview of the most critical threats**. This approach allows for the implementation of specific policies, procedures, and structures for each type of risk, ensuring that they are properly managed.

Finally, **transparency in risk communication** is another key aspect. Effective channels have been established to ensure that any threat is detected as early as possible, thus minimizing its potential impacts. This principle ensures that information flows clearly and promptly, strengthening the organisation's response capacity.

Regarding continuous improvement, Línea Directa conducts periodic reviews of its risk management system to assess its adequacy, efficiency, and suitability. This process allows for the identification of improvement opportunities based on internally reported impacts or new external tools and knowledge, ensuring that risk management evolves and adapts to the changing needs of the environment.

External support has been obtained for the performance of a fraud risk gap analysis, which has amounted to € 48,316.00 in 2025.

Furthermore, the adequacy and level of the Company's provisions have been analyzed to assess its prudence. This analysis was supported by external sources, with a total amount of € 31,405.40 in 2025.

Additionally, we have collaborated with an external specialist consultancy for the review of the internal premium model, whose expenditure in 2025 amounted to € 179,675.13.

Finally, all risk management actions are aligned with internal regulatory compliance and the corporate values reflected in the organisation's Code of Ethics. Under the principle of "zero-tolerance" for illegal acts or fraud, the Group reinforces its commitment to legality and integrity in every aspect of its operations.

Taken together, these actions and principles form the basis of the risk management of the Línea Directa Group, providing a robust and dynamic control environment that allows risks to be mitigated effectively and ensures the long-term sustainability of the Group.

## Metrics and targets

### MDR-M. Metrics in relation to material sustainability matters.

The Línea Directa Group's risk management system is designed to ensure the proper identification, measurement, management, and control of the most relevant risks facing the Group. This comprehensive approach is implemented through a structured framework of controls, reports, and specific training programs that guarantee long-term sustainability and operational efficiency.

As shown previously, the management structure is organized around a three-line-of-defense model:

- **First line of defense:** Business and support areas are responsible for identifying, managing, and reporting the risks associated with their daily activities, ensuring effective and appropriate control of their operations. To this end, they have internal control teams that regularly monitor the most relevant risks and implement key assurance controls.
- **Second line of defense:** led by the Corporate Risk area, this line includes specific functions such as Risk Management, the Actuarial Function, Regulatory Compliance, the Internal Control System for Financial Reporting (ICFR), the Internal Control over Sustainability Reporting System (ICSR), and Fraud Management. These functions evaluate the effectiveness of controls, propose improvements, and report their status to the governing bodies.
- **Third line of defense:** The Internal Audit Function independently oversees the activities of the first two lines, identifying areas for improvement and ensuring regulatory compliance and the sustainability of the risk management system.

On the other hand, Línea Directa uses a **KRI (Key Risk Indicators) scorecard** that allows monitoring and evaluating the status of risks throughout the organisation.

Key Risk Indicators (KRIs) have specific characteristics that guarantee their usefulness for risk management:

- **Measurable:** based on objective and quantifiable data.
- **Specific:** designed for each relevant risk category.
- **Newspapers:** evaluated at a set frequency.
- **Predictive:** aimed at anticipating possible risk events.

- **Relevant:** selected for their strategic and operational importance.

The Board of Directors and the Audit and Compliance Committee review the Key Risk Indicator (KRI) thresholds annually to ensure they are aligned with the Group's risk appetite. Indicators that are closer to the root cause of risk allow for faster, proactive mitigation measures.

On the other hand, the Group identifies and manages a wide range of risks, classified into the following main categories:

- Non-life subscription risk.
- Health risk.
- Market risk and concentration.
- Financial, credit and counterparty risks.
- Operational risks, including cybersecurity.
- ESG (Environmental, Social and Governance) Risks.
- Strategic and emerging risks.
- Reputational risk.
- Regulatory compliance risk.

ESG risks are addressed as aggregate risks, combining elements from other categories and offering a comprehensive view. Emerging risks, due to their uncertain nature and potential for severe impacts, receive specific attention and are continuously assessed.

In addition, a "**Top 10 Perspective**" has been defined, grouping the most critical risks with potential strategic impacts. These risks are supported by strong mitigation frameworks and are reviewed annually to ensure their alignment with corporate goals.

### **Emerging risks.**

Within the framework of Línea Directa Aseguradora comprehensive risk management, emerging risks represent a strategic challenge due to their novel, uncertain, and difficult-to-quantify nature, given their high level of uncertainty (medium- and long-term time horizons). Although they typically have a low probability of occurrence, their materialization can have significant economic and reputational impacts. For this reason, these risks are considered a special category within the Group's Risk Map, allowing for differentiated analysis and monitoring.

The following have been identified as particularly important in Línea Directa:

#### **Unethical Artificial Intelligence.**

The exponential advancement of artificial intelligence technologies poses risks related to their potential unethical use. The lack of robust regulatory frameworks or their uncontrolled development can lead to situations where machine autonomy or the creation of **superintelligence escapes human guidance**. This risk includes the Group's failure to adapt to advanced technological environments and exposure to AI that does not meet ethical standards or that compromises the integrity of data and decisions.

### **Competition with large distribution operators.**

The risk of large global platforms diversifying into the insurance sector poses a significant competitive threat. Factors such as globalization, sector liberalization, and weak barriers to entry amplify this risk, which could displace traditional operators and generate significant pressure on prices and services.

The mental health of individuals, the full extent of which is still unknown in the coming years, encompasses numerous variables that can lead to mental health problems. The greatest potential impacts on the Group in this regard would be the increased demand from customers for Health products, a rise in claims, and a greater demand for treatments related to mental health conditions, which could affect investment.

### **Autonomous mobility.**

The adoption of autonomous vehicles represents an unprecedented transformation in the mobility sector and, consequently, in the insurance industry. Among the associated risks are a level of claims still unknown to the insurance industry and the specific coverage that companies must develop to respond to new market demands and changes in user behavior.

In short, managing emerging risks is fundamental to ensuring the sustainability and resilience of the Línea Directa Group in a constantly changing environment. This proactive approach allows the Group to anticipate future challenges, consolidating its position as a leader in innovation and adaptation within the insurance sector.

### **Assurance and supervision.**

Internal audits and external reviews reinforce the quality and transparency of the risk management system.

The Internal Audit function always includes the functions of the second line of defense in the scope of its work. In this way, in addition to providing information on the status of risk assurance, these functions are subject to observations and commitments to address weaknesses that improve risk management.

Annual assessments integrate aspects related to the ICFR and ICSR, ensuring that risk management supports operational sustainability and shareholder confidence.

This comprehensive and structured approach allows Línea Directa to guarantee an efficient control environment, adapted to the dynamic needs of the sector and aligned with its commitment to sustainability and responsible management.

### **Risk culture and training.**

To foster a strong risk culture, Línea Directa implements various initiatives, such as regular training for non-executive directors aimed at familiarizing them with risk management principles and strategies, general employee training with training modules on Regulatory Compliance and COSO methodology, and the integration of risk criteria into new products and services with an evaluation checklist for each one, developed by the risk area functions.

In 2025, continuing with the development of the assurance map, training on risk assessment methodology and internal control has been provided.

A total of 54 people participated, including those from the designated groups and those expanded by Internal Audit in the third phase, with individuals from Finance, General Secretariat and SyP, as well as HR and Risk. Also in attendance were individuals who

had not yet completed the training conducted in 2024 and who have since joined the company.

The goals of this training have been:

- Incorporate the 'culture of risk' into the company's processes.
- Understanding risk and its control environment.
- Understanding the three lines of defense model and risk insurance.
- To know the responsibilities of the area's 'internal control'.
- Acquire sufficient knowledge to apply the corporate internal control methodology.

### **MDR-T. Tracking effectiveness of policies and actions through targets.**

The Línea Directa Group has established a rigorous and structured framework for monitoring the effectiveness of its risk management policies and actions by defining annual goals aligned with the corporate strategy and priorities set by the Board of Directors. This system ensures constant monitoring of identified risks, fostering continuous improvement and guaranteeing the Group's operational sustainability.

2025 Review: Main achievements during 2025, the Corporate Risks area reached significant milestones in the development and consolidation of its risk management processes and tools.

2025 was the year in which a complete cycle of review of all risks and their controls was completed (biennial review).

Besides:

- New risk taxonomies have been registered (DORA, GDPR, IA) and thematic campaigns (cross-cutting throughout the organisation) have been carried out to assess the effectiveness of controls that mitigate these risks.
- IFRS17 has been integrated into the Financial Reporting Control System (ICFR) and the Sustainability Information Control System (ICSR) has been fully developed.
- The organisation's risk appetite and capacity have been approved (at the proposal of Corporate Risks).

The next fiscal year 2026 will be the year in which the new risks and control environments raised in 2025 will reach full maturity by being incorporated into the ordinary cycle: Risk analysis (definition and criticality), Validation, Evaluation of the effectiveness of the control environment, Criticality analysis.

- Furthermore, the residual criticality of all risks is expected to be below risk appetite and exceptionally below risk capacity.

The scope of risk management, and consequently the goals defined above, encompass the entire Group and applies to all risk taxonomies identified in the policy. All goals defined above are absolute and will be considered achieved if 100% of the actions defined for their development are completed.

On the other hand, the Corporate Risks area participates in the Group's quarterly incentive program, which establishes measurable goals related to improving the control environment,

updating the risk map, monitoring key controls, and applying relevant regulations. This scheme promotes a culture of responsibility and commitment, linking individual and collective performance with Línea Directa 's strategic goals.

These goals are monitored systematically, with regular reviews that ensure the effectiveness of risk management policies and actions, while also facilitating the identification of opportunities for improvement and the implementation of corrective measures when necessary. This methodology strengthens the Group's ability to anticipate and proactively respond to the challenges of the business and regulatory environment.

## Digitalisation and innovation (Entity-specific)

### Governance

#### GOV-1. The role of the administrative, management and supervisory bodies.

The Línea Directa Group has established a robust **governance structure** to lead its digitalisation and innovation strategy, aligned with its sustainability and business growth goals. The Digital Transformation team plays a central role in this, leading the definition and implementation of the digital governance environment through a specific procedure by 2025.

This team is responsible for developing a comprehensive policy that defines the mission and purpose of the digital transformation, along with clear roles and responsibilities and effective accountability mechanisms. To this end, specific committees have been established to oversee both the strategic direction and the execution of key digital transformation projects.

In this regard, the **Company's Project Prioritization Committee** is responsible for overseeing and approving digital transformation projects. This committee ensures that the projects are aligned with strategic goals. The Technology department reports on the progress of Digital Transformation (DT) projects, along with the rest of the Company's projects.

The Monthly **IT-Digital Transformation Committee** focuses on monitoring digital transformation initiatives and projects and their implementation, ensuring that established deadlines and goals are met, exclusively reporting on the progress of TD projects, together with the IT teams involved in the development of the area's technological projects.

Additionally, quarterly meetings are held with the business areas, in which progress in Digital Transformation is shared and their future needs are identified.

The Campaign Prioritization Committee meets every two weeks with the directors of the Portfolio, Technical, Commercial and Marketing areas to prioritize the commercial campaigns executed by the Marketing and TD teams.

The Conversion Rate Optimization (CRO) Committee meets monthly with the Marketing, Sales, and TD teams to explain the results of experiments and share best practices.

This strategy ensures that Línea Directa 's digital governance is guided by an ethical framework, responsible data use, clear boundaries, and strict safeguards. This includes implementing specific standards in areas such as the energy consumption of digitized models and the accessibility of digital functionalities. Furthermore, digital assets are continuously reviewed to assess their economic return and contribution to the Group's strategic goals. The governing bodies regularly monitor and evaluate the progress of these initiatives to ensure their alignment with the organisation's overall sustainability strategy.

In the area of innovation, the Group has a specific, standardized procedure that governs the operation of the Product Committee. This committee, framed within the **Product Control and Governance Policy** (updated in 2025), is responsible for defining activities, roles, areas of responsibility, and organisation for the design, approval, and modification of insurance products. This procedure, developed in accordance with the principles of Línea Directa 's Code of Ethics and aligned with the Sustainability Policy, applies to all business units and personnel involved in these processes.

Regarding the composition and diversity of the Product Committee members and the various governing bodies, and their capabilities and expertise in this area, this information is reflected in Chapter ESRS 2, Governance. Furthermore, the governing bodies oversee the establishment of targets related to material issues, risks, and opportunities and monitor

progress toward achieving them, as detailed in Subchapter MDR-P, Policies adopted to manage material sustainability issues.

This comprehensive approach to governance and innovation highlights Línea Directa 's ability to lead in a dynamic and competitive environment, leveraging both digitalisation and innovation to achieve its strategic goals.

## Strategy

### **SBM-3. Material impacts, risks and opportunities and their interaction with strategy and business model.**

Línea Directa Aseguradora, through the double materiality analysis carried out throughout 2024, and updated in 2025, whose methodology is indicated in chapter ESRS 2 Impacts, risks and opportunities management, has identified a Positive impact and a material opportunity for the Group, as shown in subchapter IRO-1 Description of the Processes to Identify and Assess Material impacts, Risks, and Opportunities Related to digitalisation and innovation.

These matters are related to and linked with its strategy and business model. Among the strategic lines of Línea Directa 's Fifth Sustainability Plan 2023-2025 are Digitalisation and Innovation. These lines prioritize ESG actions and lead to concrete actions that define the aforementioned Plan. For a detailed analysis of the resilience of the company's strategy and business model, including qualitative and quantitative analysis, as well as the applied time horizons, see Chapter ESRS 2.

Línea Directa fosters internal innovation through its **10X Innovation Program**, a corporate initiative with its own methodology focused on product differentiation and business expansion. This program promotes the formation of innovation teams comprised of high-potential employees, whose mission is to identify new business opportunities through a process encompassing the phases of exploration, ideation, validation, and implementation. This methodology allows the company to quickly understand customer needs, test concepts via prototypes, and launch new products to market in record time, thereby strengthening its ability to respond to market demands and consolidating its business strategy based on innovation and sustainability.

In 2025, the 10X corporate intrapreneurship innovation program was inactive, prioritizing innovation developed within the company through other initiatives. The focus in 2025 was on launching new products and services for the Group. The program will be relaunched in 2026, with the initial steps already taken to reactivate and implement it during the current fiscal year.

## Impacts, risk and opportunity management

### **IRO-1. Description of processes to identify and assess material impacts, risks and opportunities related to digitalisation and innovation.**

As has been developed in greater detail in chapter ESRS 2 Impacts, risks and opportunities management, the following process was followed for the assessment of impacts, risks and opportunities, carried out in 2024:

- 1 Firstly, a context analysis was carried out, using both internal and external sources of information, to obtain a first approximation of potentially material issues from a cross-cutting sustainability perspective.

- 2 Secondly, a preliminary identification of the topics and Sub-topics was carried out, defined from the list of Topics, Sub-topics and Sub-sub-topics proposed in ESRS 1 AR 16 and from the previous material of the Group.
- 3 Thirdly, the Impacts, Risks and Opportunities (IROs) were identified, examining and considering the information present in the sources used in the first phase of the project.
- 4 Fourthly, based on the quantitative data that has been given to each IRO, the consultations carried out with the different Stakeholders and the Group's management framework, the materiality value of each of them was obtained.
- 5 Finally, the material themes were obtained, identifying 11 material environmental, social and governance (ESG) issues.

| Sub-topic                                                  | Sub-topic linked to ESRS | Positive / Negative Risk / Opportunity | IRO Description                                                                                         | Value chain                    |
|------------------------------------------------------------|--------------------------|----------------------------------------|---------------------------------------------------------------------------------------------------------|--------------------------------|
| Enhanced efficiency and innovation in business development | Entity-specific          | Positive impact                        | Decreased reliance on material resources and improved process efficiency through digitalisation         | Own operations - own workforce |
| Enhanced efficiency and innovation in business development | Entity-specific          | Opportunity                            | Adoption of cutting-edge technologies and digital systems to differentiate the Company from competitors | Downstream - Own Operations    |

In the area of digitalisation and innovation, both a positive impact and an opportunity were identified as materials; these have been determined through a double materiality analysis whose methodology is described in greater detail in chapter ESRS 2 Impacts, risks and opportunities management.

A positive material impact has been determined with a direct effect on the company's own operations, particularly in relation to its own workforce. This analysis has been supported by management tools such as the Sustainability Policy and the Environmental Management and Climate Change Policy.

### Positive impact.

A reduction in the use of material resources and an improvement in process efficiency have been observed thanks to digitalisation. This impact directly affects our own operations, particularly the employee stakeholder group. For example:

- More than **65% of tow truck requests** in December 2025 and more than half of the motor and home insurance claims openings annually continue to be carried out digitally, generating significant savings in the calls managed each month.
- Access to digital channels (web and APP) averages **2.4 million per month**, multiplying the volume of calls received by 2.7, reflecting a steady rise in the preference for digital tools.
- The chat feature stands out, where the application of generative artificial intelligence allows for more efficient customer service, autonomously **resolving 6 out of 10 queries**. Consequently, efficiency is increased, allowing a single operator to handle the remaining four queries.

Furthermore, a material opportunity has been identified that affects both internal operations and the downstream value chain.

### **Opportunity.**

The company identified an opportunity in implementing emerging technologies and digital systems that would position it as a leader compared to its competitors. Notable examples include:

- Completely **automated digital processes** that allow customers to modify their policies without the need for human interaction, surpassing the practices observed in the competition.
- Development of a **hybrid conversational chat**, blending artificial intelligence with human agents to efficiently handle a large volume of interactions. This chat is connected to operational systems, offering tailored responses based on each client's needs.

Both IROs reflect Línea Directa 's commitment to innovation and sustainability, strengthening its business model and adding value to its own and downstream operations. The Double Materiality analysis has been key to ensuring a comprehensive approach, considering both the impacts perspective (inside-out) and the financial perspective (outside-in).

Furthermore, it is important to highlight that for the assessment of the IROs, consultations with four of the main Stakeholders for Línea Directa have been taken into account through their participation in surveys and, in a complementary manner, focus groups have been carried out with the employees of the Group, as well as interviews with members of the management of Línea Directa Aseguradora.

The objective of these surveys was to incorporate the opinion of the Stakeholders in the assessment of the topics and Sub-topics and to be able to obtain a more comprehensive result.

During 2025, a consultation was carried out with the Sustainability Working Group, which allowed for the continuation of the Double Materiality exercise and maintained the list of IROs and material issues for the Company. The results of this Double Materiality update have been approved by the Sustainability Committee and form the basis for integrating digitalisation into the corporate strategy, promoting sustainable growth aligned with the principles of environmental, social and corporate governance.

### **MDR-P. Policies adopted to manage material sustainability matters.**

The Línea Directa Group has developed a comprehensive governance environment for digitalisation, based on the results of an internal audit carried out in 2024. The action plan for this audit was completed in 2025, with the objective of establishing a policy that strengthens digital transformation processes, ensuring their alignment with the Group's strategic goals and the management of material impacts, risks and opportunities, detailed in section IRO-1.

### **Purpose and main objectives.**

The comprehensive digitalisation policy initially planned for 2024 has evolved into a process that aims to define a comprehensive framework in 2025 to address key aspects of digital transformation, including:

- **Mission and purpose of digital transformation:** To establish a clear vision and defined objectives to guide all digitalisation initiatives.
- **Responsibilities and accountability:** Define the functions of governing bodies, such as specific committees for projects and digital transformation.
- **Ethical framework:** Incorporate principles for the responsible use of data, with limits and safeguards that ensure compliance with ethical standards.
- **Standard setting:** Defining criteria for aspects such as the energy consumption of digitized models and the accessibility of digital functionalities.
- **Digital asset review process:** Implement methodologies to periodically evaluate the functionality and economic effectiveness of digital assets.
- **Economic return evaluation:** Designing tools to measure the financial and social impacts of digital projects.
- **Reviewing data relevance:** Ensuring data accuracy through control mechanisms in cases of communication errors, such as failed emails.

This approach not only seeks to optimize digital processes, but also to ensure that all initiatives are developed within a framework of sustainability, efficiency, and corporate responsibility.

## Key policies and procedures in digitalisation and innovation.

In the field of innovation and digitalisation, Línea Directa has two relevant documents:

### 1. Product Control and Governance Policy:

Its main objective is to ensure that the products designed, developed and marketed by the Company comply with applicable regulations, in particular Decree-Law 3/2020 and Delegated Regulation (EU) 2017/2358.

This policy applies to all phases of the product life cycle, from design to post-market follow-up, with an emphasis on meeting customer needs, continuous improvement, transparency, regulatory compliance, and sustainability. All products marketed by Línea Directa Aseguradora S.A. are covered by this policy, whether they are motor, home, or health insurance, which are the business lines at the time this policy was developed.

### 2. Comprehensive Governance Procedure for Digitalisation:

The procedure (initially conceived as a policy) establishes the principles for addressing material IROs in the context of digital transformation.

It defines ethical, operational, and technical standards that guide the implementation of digital projects in alignment with the corporate strategy.

Both documents are designed to promote responsible innovation, sustainability and accessibility, ensuring that Línea Directa 's products and services are beneficial to both customers and society.

## Application and monitoring.

The Product Control and Governance Policy establishes three key phases:

1. **Design:** Defines characteristics, costs and risks associated with the product, ensuring its suitability to the target market, includes preliminary tests to validate the impacts on consumers and establishes distribution strategies and controls to monitor marketing.
2. **Approval:** New products or substantial modifications are approved by the Product Approval Committee, which ensures their alignment with the goals and characteristics of the target audience.
3. **Monitoring:** Continuously evaluates the suitability of the product to the target market, verifying that it is marketed correctly and transparently.

### **Governance and access.**

The product governance framework is based on compliance with the principles established in Línea Directa 's policies. Key pillars include the active involvement of product committees, transparency in design and marketing processes, and the promotion of sustainable and inclusive practices. The product control and governance policy has been approved by the Board of Directors, and to ensure its implementation, the Línea Directa Group has a Product Approval and Monitoring Committee.

The Product Control and Governance Policy is available to all employees on the company intranet, ensuring it is accessible and understandable at all levels of the organisation. This approach reinforces Línea Directa 's commitment to responsible innovation and operational excellence.

### **MDR-A. Actions and resources in relation to material sustainability matters.**

The Línea Directa Group's Digitalisation Plan for 2025 is based on strategic actions aimed at optimizing operational efficiency, improving the customer experience and exploring new business opportunities through the implementation of innovative technologies.

In addition to ensuring full functionality across digital assets, priority is being given to resolving processes that the Group has not yet fully digitized, with the aim of offering an omnichannel experience to customers. Processes such as invoice payments, verifications via the app, and document uploads will enable the best possible digital experience, allowing customers who wish to do so to carry out any transaction without having to use the telephone channel.

As part of the technological renewal, a fundamental part will be re-engineered with the aim of changing the architecture in which the Group currently operates to a more modern one that will allow it to be much more agile and robust in the future.

This approach integrates digital transformation, the re-engineering of technological assets, and the adoption of advanced solutions that contribute to strengthening the business model. The main actions carried out during 2025 and those planned for the future are presented below, along with the resources allocated and the expected results.

During 2025, advances in digitalisation have been made following these four pillars:

1. **Functional completeness:** Building on last year's progress, this year's objective has been to fully implement the policy modification features in the digital channel. Functional completeness refers to ensuring that customers who use digital channels to interact with the Group have access to the same features and services as those who use the telephone to contact the company.

2. **Continuous process improvement:** Enabling customers to perform transactions autonomously through digital channels requires adapting the experience to the nature of this medium. This means designing processes that eliminate the complexities inherent in the insurance business for the customer. In this regard, by leveraging AI implementations in claims processing, we have continuously improved our models and retrained our AI engines to deliver the best possible experience.
3. **Self-contained channel:** continuing with the improvement on the Group chat, upgrades have been made that allow customers to access this channel through new spaces, also from the quick login available in travel assistance.

Since the second half of 2025, chat has been accessible from all main customer locations, resulting in a 20% increase in chat volume compared to the first half of the year, without compromising resolution efficiency or requiring any resizing of the human team.

The growing trend of the type of queries that AI resolves in the first instance has continued.

Furthermore, the Group has undertaken a technological re-engineering project in which the customer area and app experience has been reinvented, adopting the best market standards and offering modern and easy navigation so that customers can operate in the most convenient way.

4. **Digital Sales:** With over 2.4 million average monthly visits, these visits have continued to be used, from a Conversion Rate Optimization perspective, to make the digital channel a more functional sales interaction, promoting cross-selling and upselling, optimizing website funnels, and offering value to the customer through the app. Furthermore, the project to redefine the customer area and app experience has increased sales positions, which will boost conversion rates.

## Digitalisation in Talent Management.

In today's landscape, the digitalisation of recruitment processes has become a strategic priority for Línea Directa Aseguradora, especially in attracting STEM (Science, Technology, Engineering, and Mathematics) professionals. The implementation of digital technologies not only optimizes talent attraction and evaluation but also reinforces the company's position as an innovative employer committed to efficiency.

Among the most outstanding performances are:

- **Use of Digital Channels:** Línea Directa uses platforms such as LinkedIn, WhatsApp, and Talent Link on its corporate website to post job openings and attract candidates. Additionally, participation in virtual job fairs allows interaction with potential candidates in a dynamic and accessible environment, facilitating the identification of highly qualified profiles.
- **Integration of Artificial Intelligence Tools:** These tools have significantly optimized the selection process, allowing for more accurate and efficient candidate identification and evaluation. Furthermore, the involvement of managers from the outset of the process ensures strategic alignment between the selected profiles and the needs of the teams.
- **"Always On" Selection Model:** This methodology allows for a continuous and proactive recruitment process, ensuring the availability of qualified talent at any time and adapting to the changing needs of the market.

These initiatives are aligned with the Group's digital strategy, which seeks to leverage technology not only to optimize operational processes, but also to strengthen human capital as a fundamental pillar for innovation and sustainable growth.

### **Customer-centric approach.**

The Línea Directa Group anchors its digitalisation strategy on a customer-centric philosophy, prioritising the customer across all processes and platforms. This orientation aims to improve the user experience, optimize operations, and minimize administrative tasks.

Thanks to this strategy, a significant reduction in average operating times has been achieved, as detailed in the section "Increased Functionality and Digitalisation of Processes". This not only significantly decreases the number of calls but also saves customers waiting time, boosting operational agility and improving satisfaction rates.

Currently, Línea Directa receives over 2.4 million monthly visits to its digital channels (website and app), which is 2.7 times the volume of calls received. This figure reflects the Positive impact of the implemented digitalisation strategies and customer preference for these channels. By the end of 2025, the number of active users, with the app installed and in use, reached 1.6 million customers, representing a 15% increase compared to the end of the previous year.

Additionally, work has been done on the redesign and re-engineering of digital assets, encompassing:

- An enhanced content structure and hierarchy, simplifying access to information and features for customers.
- Market-leading usability, delivering a digital experience on par with top industry standards.
- Conversion of interactions into sales opportunities using marketing automation tools and sales propensity models crafted by the technical team.

Furthermore, this project has included a change in the technological architecture of the applications, making them more agile for continuous improvement. Finally, Línea Directa has implemented the new WCAG accessibility standards, ensuring that digital assets are inclusive for all users, including those with low vision. This commitment to accessibility has continued into 2025 with additional projects that will enable a more inclusive experience and will be further developed in 2026 with the creation of an accessibility governance model within the Sustainability Plan.

### **Innovation and entrepreneurship at Línea Directa.**

The Línea Directa Group promotes innovation and entrepreneurship through specific initiatives that strengthen its business model and reinforce its commitment to sustainable development. One of these initiatives is the **10x intrapreneurship program**, designed to foster differentiation and growth through a proprietary methodology. This program is organized around specialized teams, composed of employees selected for their experience, track record, and potential. These teams focus on identifying new business opportunities, following a structured process that includes the phases of exploration, ideation, validation, and implementation.

During the exploration phase, an intensive trend analysis is conducted, while the research phase addresses the definition of challenges and the relevance of the identified opportunities. Subsequently, in the ideation stage, solutions are conceptualized and pilot teams are assigned. Finally, validation includes the development of prototypes, the evaluation of results, and the initial market launch of the solutions.

In 2024, several projects generated by this program were presented to the Group's management in an elevator pitch format during a conference at IESE Business School in Madrid, which was closed by the CEO of Línea Directa. These proposals, designed to incorporate unprecedented coverage and features in the insurance sector, aim to complement the Group's commercial offering, consolidating it as a multi-line, multi-product organisation. Their development will continue in 2025 and 2026, aligned with the company's strategic priorities.

Additionally, Línea Directa collaborates with IESE on an entrepreneurship support program, launching business challenges aligned with its business priorities. These challenges include areas such as talent attraction, new product and service design, and improving the customer journey, among others.

Furthermore, innovation remains a strategic cornerstone for the Company, with developments aimed at offering differentiated products that meet the emerging needs of customers:

- **Coverage for illegal squatting:** This pioneering insurance in Spain offers a comprehensive solution against the legal and financial consequences of illegally occupying homes. It includes legal assistance, financial remuneration, and access to a network of repairers.
- **Pet insurance:** Designed to meet the legal requirements of the Animal Well-being Act, this product incorporates advanced services such as 24/7 tele-vet, electronic prescriptions, and coverage for damages and liabilities up to € 300,000.

Both products reflect Línea Directa 's commitment to meeting emerging customer needs while strengthening its business model.

Finally, the Línea Directa Foundation reinforces innovation in road safety through its Entrepreneurs Award, a well-established initiative that celebrated its 11th edition in 2025. This competition acts as a startup accelerator, funding projects with the potential to save lives on Spanish roads. With a net prize of € 20,000 and training, this award promotes innovative solutions that contribute to social well-being and sustainability.

### **Actions to enhance processes and channels.**

During 2025, substantial improvements were implemented in digital processes and channels to enhance the customer experience:

1. **Functional completeness:** The digitalisation of policy management (modifications, product switches, inclusion of drivers) allowed customers to perform these tasks both in the app and on the web.
2. **Simplified processes with AI:** Implementing artificial intelligence in the opening of cases optimized case classification, reducing the time and complexity of procedures for customers and agents.

3. **Self-contained channel:** With the hybrid chat project, customers can get direct assistance in the digital environment, reducing the need to switch to other channels and improving self-service rates.
4. **Digital sales:** Personalizing digital interactions and integrating strategies like A/B testing with Adobe Target have increased conversions and business opportunities.

### Resources allocated.

To achieve its digitalisation and innovation goals, Línea Directa has allocated significant resources, including:

- **Technological investment:** Incorporation of advanced tools, such as generative AI models and marketing automation platforms.
- **Human Capital:** Specialized teams have led and executed the key initiatives of the plan.
- **Commitment to accessibility:** Implementation of international regulations, such as WCAG standards, to ensure an inclusive experience across all digital assets.

### Monitoring and evaluation.

The Digitalisation Plan's is reviewed regularly through meetings between the CEO, the Head of Digital Transformation, and the management team. This monitoring, which is presented to the Steering Committee, ensures that actions are aligned with the Group's strategic goals, allowing for timely adjustments to maximize the impacts and effectiveness of the initiatives.

## Metrics and targets

### MDR-M. Metrics in relation to material sustainability matters.

The Línea Directa Group employs a robust system of key performance indicators (KPIs) to evaluate the impacts and effectiveness of its digitalisation and innovation initiatives. These KPIs allow the company to measure the performance of its strategic initiatives and ensure their alignment with corporate goals and customer needs. They are as follows:

#### 1. Percentage of errors in digital assets.

This indicator monitors errors detected in the mobile application and website, reflecting the frequency of impacts experienced by customers. It is considered a Key Risk Indicator (KRI) and is reported directly to the Audit and Compliance Committee.

In 2025, with the technological upgrades implemented in the customer area and the app and given that the new services developed are more robust and user-friendly, a reduction in current error rates is expected. At year-end, 6.7% of website errors and 1.7% of app errors were recorded, which will be monitored to achieve continuous improvement in 2026.

#### 2. Adoption of digital channels by customers.

The percentage of towing requests and requests for vehicle and home lockouts made digitally is measured. Línea Directa currently registers more than 2.4 million digital interactions per

month, representing a volume 2.7 times greater than the number of phone calls received, reflecting the growing customer preference for digital channels.

### 3. Performance of the hybrid chat channel.

This channel, operated using artificial intelligence and human operators, has proven highly effective. Thanks to AI models, over 64% of inquiries are resolved automatically, allowing operators to focus on higher-value tasks.

In the second half of 2025, the volume of conversations managed in the first half of the year increased by 1.2 times, reaching an average of 175,000 chats.

## MDR-T. Tracking effectiveness of policies and actions through targets.

The Línea Directa Group has established a structured monitoring framework to evaluate the effectiveness of its digitalisation and innovation policies and actions. This system ensures that initiatives are aligned with the annual strategic goals set by the CEO, overseen by the Head of Digital Transformation, and supported by key parameters and tailored KPIs.

### Monitoring methodology and strategic goals.

To ensure a comprehensive evaluation, the indicators are reviewed periodically, allowing them to be adapted to client needs and the Group's internal goals. In this context, the strategic priorities for 2025 are as follows:

- **Enhance digitalisation rates:** Increase the number of operations performed digitally, such as tow truck requests, engine and home parts openings, and supplements, reducing the need for follow-up calls.
- **Grow digital sales:** Increase the number of coverages sold from the private area and the overall sales volume through digital channels.
- **Improve operational efficiency:** Implement improvements in key processes, such as the hybrid chat channel and digital procedures for making policy modifications.
- **Elevate customer and employee satisfaction:** Measure customer experience (via digital Net Satisfaction Score, NSS) and employee experience through targeted surveys, ensuring that Key Risk Indicators (KRIs) remain below established thresholds.

### Periodic monitoring and governance.

The monitoring system includes monthly target tracking, allowing for continuous evaluation of goal achievement. These reviews are overseen by the Steering Committee, along with the CEO and the Head of Digital Transformation, who ensure that necessary adjustments are made to keep performance aligned with the Group's strategic goals.

In the area of product innovation, sales volumes and profitability of new products are integrated into the Group's profit and loss statement. The results are analyzed in regular follow-up sessions, organized according to the product policy, ensuring management is aligned with strategic goals and promoting effective governance.

### **Impacts of monitoring initiatives.**

The effects of these efforts are evident in concrete metrics, such as reduced error rates in digital assets and greater adoption of digital channels.

During 2025, one of the projects with the greatest impact on daily customer management was the digital add-ons project. This initiative has made it possible to bring the same policy management functionalities that customers can perform on their phones to the digital channel. These add-ons allow customers to make changes to the driver, payment method, bank account, and product, among other things.

By the end of 2025, more than 40% of these operations will be carried out by customers digitally and autonomously, compared to 34% in 2024.

### **Success story: Hybrid chat channel.**

A prime example of goal tracking is the hybrid chat channel, which yielded key findings after its second year of operation:

- It continues to be a channel ten times more efficient than the telephone, allowing an operator to handle between three and four conversations simultaneously.
- Artificial intelligence has managed to increase the handling of the most frequent queries by up to 64% (an increase of 4 percentage points compared to 2024), reducing the workload of operators and allowing for more personalized customer service.
- This channel has become established, closing the year as another customer service channel, with an average of 175,000 conversations in the last six months of the year.

### **Commitment to continuous improvement.**

Línea Directa 's monitoring approach ensures that actions are aligned with strategic goals and promotes continuous improvement, maximizing the impacts of digitalisation and innovation policies. This strategy allows the company to maintain a competitive position, focused on operational sustainability and the satisfaction of customers and employees.

## ESG product design (Entity-specific)

### Governance

#### **GOV-1. The role of the administrative, management and supervisory bodies.**

The design, development, and launch of ESG products has been a key component of Línea Directa Aseguradora's 2023-2025 Sustainability Plan and will continue through new responsible marketing and customer loyalty initiatives within the new 2026-2028 Sustainability Plan. At the close of the fiscal year, the company's Board of Directors approved the plan for the next three years and established its monitoring metrics, which include the generation of sustainable business.

By the end, the Board of Directors relies on the Appointments, Remuneration and Corporate Governance Committee, whose functions include overseeing the Group's environmental, social and governance practices. This body also monitors the Group's Sustainability Strategy and Plan, assesses its level of compliance, and reviews its policies, evaluating it at the close of the 2025 financial year.

On the other hand, the Sustainability Committee reports to the aforementioned Commission through the People, Communication, and Sustainability Department. This Committee is made up of the directors of the main areas closely linked to Línea Directa Aseguradora's ESG strategy, who promote compliance with the Plan within their respective areas, meeting at least three times a year. Specifically, the People, Communication, and Sustainability Department, the General Secretariat, the Services, Claims, and Assistance Department, the Finance Department, and the Marketing Department are all represented.

The Sustainability Working Group comprises leaders of the corporate areas with the greatest influence on the sustainability strategy: External Communications and Sustainability, Corporate Governance, Investor Relations, Services and Claims, Risk, Product Innovation, Quality, Purchasing, Space Management, People, and Social Action. The Group is led by the Head of External Communications and Sustainability. Meeting monthly, this group ensures the implementation of various actions and projects across both corporate and business areas, and monitors progress toward the objectives set in the Sustainability Plan, including the design and development of ESG products planned for each fiscal year.

The composition and diversity of the members of the governing bodies, as well as their capabilities and expertise, are detailed in Chapter ESRS 2, Governance. Furthermore, the governing bodies oversee the establishment of targets related to material incidents, risks, and opportunities and monitor progress toward their achievement, as outlined in subchapter MDR-P Policies Adopted to Manage Material Sustainability Matters.

The design and development of these products also involves the Company's Product Committee, led by the Head of Marketing, which organizes various strategic sessions, as well as operational and product approval sessions.

### Strategy

#### **SBM-3. Material impacts, risks and opportunities and their interaction with the strategy and business model.**

Línea Directa Aseguradora, through the double materiality analysis carried out throughout 2024, and which has been updated in 2025 whose methodology is indicated in chapter ESRS 2 Management of impacts, risks and opportunities, has identified a material opportunity for the

Group, as shown in subchapter IRO-1 Description of the processes to determine and evaluate impacts, risks and opportunities of relative importance related to the design of ESG products.

This opportunity is related to and linked with their strategy and business model. Sustainable products and services are among the strategic lines of Línea Directa 's Fifth Sustainability Plan 2023-2025. This line prioritizes ESG action and leads to concrete actions that define the aforementioned Plan.

The VI Plan, approved in December 2025 and valid until 2028, also includes a strategic line in this area.

The material opportunity lies in meeting customers' need to transition to a sustainable economy by increasing the Group's offering of sustainable products and services that serve as substitutes for traditional ones, thereby reducing the impacts of its activities on the environment and society. In this regard, the Company has awareness programs and a policy framework such as the Product Control and Governance Policy, which establishes the guidelines to be followed and regulates the marketing process for new insurance products at all stages, as well as the control and monitoring of existing products, and corrective measures where necessary, including sustainable or ESG products.

## Impacts, risk and opportunity management

### **IRO-1. Description of the processes for determining and evaluating the impacts, risks and opportunities of relative importance related to the design of ESG products.**

As has been developed in greater detail in chapter ESRS 2 Impacts, Risk and Opportunity Management, the following process was followed for the assessment of impacts, risks and opportunities carried out in 2024:

1. Firstly, a context analysis was carried out, using both internal and external sources of information, to obtain a first approximation of potentially material issues from a cross-cutting sustainability perspective.
2. Secondly, a preliminary identification of the topics and Sub-topics was carried out, defined from the list of Topics, Sub-topics and Sub-sub-topics proposed in ESRS 1 AR 16 and from the previous material of the Group.
3. Thirdly, the Impacts, Risks and Opportunities (IROs) were identified, examining and considering the information present in the sources used in the first phase of the project.
4. Fourthly, based on the quantitative data provided to each IRO, the consultations carried out with the different Stakeholders and the Group's management framework, the materiality value of each of them was obtained.
5. Finally, the material themes were obtained, identifying 11 material environmental, social and governance (ESG) issues.

| Sub-topic            | Sub-topic linked to ESRS | Positive / Negative Risk / Opportunity | IRO Description                                                                                                                        | Value chain                 |
|----------------------|--------------------------|----------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|
| Sustainable products | Entity-specific          | Opportunity                            | Supporting customers in the energy transition and towards a sustainable economy, as well as offering alternative products and services | Downstream - Own Operations |

This opportunity has been deemed material following a Double Materiality analysis, the methodology of which is described in greater detail in Chapter ESRS 2, Incident, Risk, and Opportunity Management. The analysis determined that the opportunity has a significant impact on both the company's own operations and the downstream value chain.

Furthermore, it is important to highlight that for the assessment of the IROs, consultations with four of the main Stakeholders for Línea Directa have been taken into account through their participation in surveys and, in a complementary manner, focus groups have been carried out with the employees of the Group, as well as interviews with members of the management of Línea Directa Aseguradora.

The objective of these surveys was to incorporate the opinion of the Stakeholders in the assessment of the topics and Sub-topics and to be able to obtain a more comprehensive result.

During 2025, the Sustainability department consulted the Sustainability Working Group to assess the continuity of the initially proposed IROs, concluding that all impacts, risks, and opportunities should be maintained.

The result of this consultation was submitted to the Appointments and Remuneration Committee for approval.

## **MDR-P. Policies adopted to manage material sustainability matters.**

In terms of ESG product design, the Línea Directa Group has policies that are associated with the opportunity identified in the double materiality analysis and indicated in detail in subchapter IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities related to ESG product design.

### **Product Control and Governance Policy.**

This policy, updated in April 2025, aims to establish the requirements for the control and governance of insurance products designed, developed and marketed by Línea Directa Aseguradora S.A. so that customers have all possible guarantees when contracting insurance in accordance with applicable regulations, in particular with Decree-Law 3/2020 (Insurance Distribution Law) and Delegated Regulation (EU) 2017/2358, which establishes the rules on the maintenance, management and review of the control and governance mechanisms of insurance products.

In this regard, the Board of Directors of Línea Directa, within the framework of its non-delegable authority to determine the Company's policies and strategies, approves the Product Control and Governance Policy, which establishes the guidelines to be followed and regulates the marketing process for new insurance products in all its phases: design, approval, and distribution, as well as the control and monitoring of existing products, and corrective measures where necessary. All products marketed by Línea Directa Aseguradora S.A. are included within the scope of this policy, whether they are motor, home, or health insurance, which are the lines of business at the time of its development. Should a new business line be launched, the content of this policy will be reviewed and adapted as needed.

Through this Policy, the Línea Directa Group develops the principles of action aligned with the commitments to transparency of information and quality in customer relations, assumed by the company in the Group's Code of Ethics. Thus, the principles on which Línea Directa Aseguradora S.A. bases its actions regarding the design, approval, and distribution of its products are:

- **Customer satisfaction.**
  - At any stage of marketing insurance products, the interests, goals and characteristics of the customers must be taken into account.
  - The products offered will be those that are most beneficial and best suited to the circumstances and needs of the customers.
- **Continuous improvement of the range and quality of products and services.**
  - New products must provide value to customers and will be designed taking into account not only their economic viability, but also the benefits for the consumer and society or their environment.
  - Existing products will be reviewed periodically to correct any deficiencies.
- **Transparency and truthfulness in product offers.**
  - Clear, complete and truthful information will be provided on the main elements and characteristics of the Entity's products.
  - Those involved in any phase of marketing insurance products must have the necessary qualifications, knowledge, and experience to understand the product and the characteristics of its intended recipients.
- **Strict adherence to regulations and commitments made.**
  - Throughout the product marketing process, applicable regulations will be taken into account, and especially the regulations on the distribution of insurance products and consumer protection.
  - In the event of regulatory changes or the approval of new corporate policies, it will be reviewed that the marketed products comply with the new requirements.
  - The commitments made by the entity in the Code of Ethics and in those policies that are applicable at any given time must be fulfilled at all times.
- **Product sustainability.**
  - When working on the design of the product offering, consideration will be given to doing so in line with sustainability taxonomies.
  - Products and services that are environmentally friendly and that drive the transition to a more sustainable and decarbonized economy will be promoted, replacing thermal coal, oil and unconventional gas.
  - Non-discrimination of current and potential customers must be ensured.
  - The direct and indirect impacts of products and services that have inclusive utility in accessing insurance or are aimed at vulnerable groups or those with special needs will be assessed, promoting said products and services where appropriate.
  - The development of innovative products and service schemes that facilitate access to insurance for the largest number of groups will be promoted.

The Product Control and Governance Policy is accessible to employees via the intranet. In addition, the Company has published its sustainability principles, which it adheres to in the design and launch of new products, on its corporate website for all Stakeholders.

## **Social Impacts and Financial Inclusion Policy.**

This policy addresses the Company's commitment to financial inclusion.

The policy states that, without prejudice to the development of products and services of this nature and in accordance with the principles established in the internal regulations relating to product governance, the Group undertakes to:

- Innovate and broaden the array of services and benefits tailored to vulnerable groups, informed by market research and customer input.
- Tailor delivery approaches to suit the needs and preferences of the intended audience.
- Provide non-financial support and enhance the financial well-being of vulnerable groups, particularly by raising awareness and sharing knowledge about the insurance industry with current and prospective customers.
- Introduce measures to prevent over-indebtedness among target groups through various financial education initiatives.
- Set up accessible complaint mechanisms for customers prioritised under financial inclusion efforts.

Regarding staff training to prevent aggressive sales tactics and collaboration with third parties to expand the reach or develop the inclusive finance market, the company bases its approach on the following principles of action, which serve as the basis for fulfilling commitments:

- Identification of vulnerable groups (current and potential) that will serve as target groups for initiatives, products and services related to financial inclusion.
- Employee training to prevent and try to avoid aggressive marketing techniques and disrespectful treatment of target groups, in line with the operating principles of the company's Talent Policy.
- Dialogue and commitment with external institutions to expand the reach or develop the inclusive financial market.

Regarding the supervision of financial inclusion, the Board of Directors, which approves the **Social Impacts and Financial Inclusion Policy** of the Línea Directa Group, will be ultimately responsible for the policy: ensuring compliance with the policy, ensuring compliance with laws and regulations in relations with its Stakeholders, and ensuring that all contracts and obligations are fulfilled in good faith, as well as with respect for customs and good practices in the development of its activity.

Línea Directa makes its Social Impacts and Financial Inclusion Policy publicly available to all its Stakeholders on its corporate website. This policy applies to the Línea Directa Group, including all its domestic operations in Spain, and is specifically aimed at vulnerable or underserved groups, with the goal of achieving a positive social impact and promoting the financial inclusion of groups that face difficulties accessing products or services due to various barriers.

## **MDR-A. Actions and resources in relation to material sustainability issues.**

Under the Product Control and Governance Policy and considering the principles set out in the Línea Directa Code of Ethics and aligned with the Sustainability Policy, Línea Directa Aseguradora updated its Internal Operating Procedure of the Product Committee in April 2025.

This procedure affects all business units of Línea Directa Aseguradora and all personnel involved in the design and approval process of new Línea Directa insurance products or in substantial modifications of those products that are already available on the market.

The following are included within the scope of decision-making of the Products Committee:

#### **1. New insurance products and services**

- The creation ex novo, based on the different analyses, opportunities or needs detected in the market.
- The company's intrapreneurship programs.
- The company's open innovation programs
- Proposals for new products and/or improvements from third parties.
- Those that result from regulatory changes.
- The specific products that have been established for new alliances with other companies.
- Changes and updates to products for new marketing campaigns (if they affect coverage, rates, premiums, target market.)

#### **2. New guarantees to add to or modify those already existing in the marketed policies.**

#### **3. Substantial modifications to insurance guarantees, products or services.**

#### **4. Review of the guarantees of policies or insurance products already marketed**

The Internal Operating Procedure of the Products Committee regulates the responsibilities of the Committee, as well as its sessions.

The Product Committee is headed by the Head of Marketing, whose department includes a dedicated Innovation Unit. This individual will be responsible for leading, promoting, reviewing, and consolidating all information related to innovation.

The following are the members of the Product Committee whose composition will be determined for each case by the Director Responsible for the Product Committee: Quality, Portfolio, Commercial, Finance, Legal, Risks, Services and Claims, Sustainability, Technical and Transformation.

The Product Working Group will consist of one person representing each of the above areas or departments, whose participation will be modulated according to the characteristics of the product.

The Product Committee will meet for design, approval, review, and follow-up in different sessions:

#### **1. Product strategy**

The strategic session will include the CEO. Decisions will be made regarding the strategy and prioritization of new products, as well as the research directions to be pursued and whether or not substantial modifications to existing products are necessary. At least one session will be held annually.

## 2. Design.

The operational session will include the Product Committee, as needed in each case. Reviews of existing products and their modifications will be submitted to this Committee.

## 3. Approval.

The approval session will include the Product Committee, depending on the needs of each case. The Product Committee will validate the requirements before commercialization, with the Head of Marketing ultimately responsible for product approval.

## 4. Review and follow-up.

The marketed product will be reviewed to ensure it continues to meet the needs of the target market and the distribution strategy. The Head of Marketing will periodically report the Committee's decisions to the Executive Committee or the Management Committee.

### **Product Design, Approval and Tracking Process.**

## 5. Design process

The design process will be structured through the operational session. Following the decision made in that session, the necessary members of the Product Working Group will be convened to carry out the design.

The members of the Working Group convened must prepare the information or validate that it has been analyzed and taken into consideration in relation to the product that is intended to be marketed.

For each product, a document/information will be used as a guide, the preparation of which will be the responsibility of the members of the Working Group, which will be indicative and will reflect different significant sections.

## 6. Approval Process.

Based on all the analysis, development and documentation prepared in the Design Phase, the Product Committee, made up of those members that the person in charge considers appropriate, will decide on the advisability of marketing the product according to their area of responsibility.

The Product Committee member will be responsible for giving final approval to the product before it is marketed, based on the analysis conducted by the convened members. This decision will be recorded in the Approval Meeting Minutes, which will be signed by the Product Committee member.

The head of Legal Advice, in her capacity as secretary of the Product Committee, will attest to the holding of the session.

The Approval Session may be conducted in person or digitally (Straight Line Procedure), which will be structured as follows:

- The Secretary of the Product Committee will send an email to the members designated by the Committee Leader, containing the documentation prepared during the design phase for final evaluation.

- Once the members have assessed the product, the secretary of the Product Committee will forward the minutes to the head of the Product Committee for signature.

#### **7. Review or follow-up process.**

The review or monitoring process will be carried out through a dashboard that will have the following key indicators: Sales, Claims Frequency, Premiums, Sufficiency and formal claims.

The review will be conducted for each product marketed within each business unit. For example, for the Motor, this will include Cars and Motorcycles, and within each of these categories, the various products marketed. This review will aim to determine whether the product remains suitable for its intended target market. To this end, factors such as the social purpose it serves, consumer demand, market standards or benchmarks, consumer expectations, and the price premium in relation to this social purpose, among others, will be considered.

#### **8. Regulatory Value for Money.**

The design and review of insurance products will take into consideration the principles that inspire regulatory value for money, so that they can meet the needs of the identified target market, offering fair value and equitable treatment to the customer.

#### **9. Go to market.**

Following product approval and prior to its launch, the Go to Market (GTM) Phase will begin, in which the strategy for launching the new product to the market will be defined.

Representatives from the relevant departments will be involved in this phase.

### **Sustainable product development**

As part of the 2023-2025 Sustainability Plan, which includes among its action blocks the generation of sustainable business and responsible marketing, the Línea Directa Group has designed and developed several products and services in the three-year period that respond to these lines of action.

Thus, Línea Directa Aseguradora offers a multitude of sustainable products and services that it has developed over the last few years, including:

- In its commitment to a new mobility model that helps decarbonize the economy, the company created a specific insurance policy for electric cars in 2017. This product supports drivers who purchase electric vehicles, and since 2022 it has been extended to plug-in hybrid vehicles and motorcycles. This insurance incorporates a range of services specifically for these types of vehicles, covering the battery in case of a claim and the charging cable in case of theft, as well as offering unlimited mileage roadside assistance for battery failure or discharge. The Group closed fiscal year 2025 with more than 60,000 electric and plug-in hybrid vehicles in its portfolio for private customers and a market share of around 8% of new registrations in this automotive segment.
- Línea Directa launched "**Liámalo X**" in 2020, the first comprehensive insurance policy with a car included for a fixed monthly price, including maintenance and taxes. This solution, which has been very well received in each of its promotional runs, regularly includes zero-emission vehicles. This insurance addresses the uncertainty generated

among consumers by restrictions on the most polluting vehicles and the rise of new forms of mobility and ownership. As of the end of 2025, "Lámalo X" has a portfolio of 1,639 policies with a car included.

- At the end of 2024, due to the DANA storm that occurred in the Valencian Community, Línea Directa launched a specific promotion aimed at its affected customers at very competitive prices and under favorable conditions, without down payments or final payments.
- Línea Directa customers have access to the **ConducTOP** mobile app, a program that analyzes their driving habits to make them safer and, therefore, more sustainable. The app takes into account the smoothness of turns and braking, acceleration, adherence to speed limits, and concentration while driving. This allows policyholders to participate in challenges and accumulate points for good driving, earning rewards and discounts on various products and services, such as fuel.
- The Company offers a **video interpreting service in sign language for deaf people**, in line with its roadmap for improving accessibility and inclusion for all groups. This service, provided in sign language, allows customers and non-customers with hearing functional diversity to make inquiries related to the Company's services and products, including purchasing insurance, reviewing policy terms and conditions, reporting accidents, and requesting roadside assistance, among many others. Launched in 2024 in collaboration with the CNSE Foundation (Spanish Confederation of Deaf People), Línea Directa aims to guarantee high-quality, personalized service that addresses the communication needs of deaf and hard-of-hearing individuals, who number around 1.2 million in Spain, and hearing people. The company utilizes Svisual, the first video interpreting service in sign language in Spain, developed by CNSE, to provide this service.
- The CAR Barcelona repair center offers a more **water-efficient car wash** service for its customers. This service features an installed water recovery system that has resulted in a 59.41% reduction in water consumption compared to the previous system, and which has continued to be used through 2025.
- The CAR Madrid repair center features **LED lighting and photovoltaic panels**. This solar panel installation produces more than 12% of the total electricity consumed by the workshop annually.
- Línea Directa Asistencia offers a **Night-time Assistance Service for Young People**, providing night-time transportation for customers under 26 years of age if they have consumed alcohol or are feeling unwell. This completely free service covers both the driver and their vehicle. The aim of this initiative, unique in the sector, is to prevent risky situations for a group particularly vulnerable to traffic accidents.
- Since 2024, the Línea Directa Group has offered its coverage for **illegal home squatting** ("Hogar Despreokupado") as a standalone insurance product. This means that a Home insurance policy is not required to purchase it, and it can also be taken out by customers who already have their home insured with another company. Launched in 2023, this insurance protects homeowners against the legal and financial consequences of illegal occupation of their property.
- Coverage includes up to € 10,000 in legal assistance from the company and legal costs (lawyer, court representative, expert witness, notary fees, court costs, and fees) to recover the home, as well as financial remuneration for expenses related to making the property habitable and other costs. The insurance also covers the cost of making the property habitable, with the option of having the service provided by Línea Directa

professionals without any financial limit, or a € b5,000 reimbursement if the homeowner arranges for these services independently. Currently, 73% of new Home Insurance contracts from Línea Directa already include this coverage.

- **New telemedicine service:** In 2025, Línea Directa launched MeetingDoctors, an app that, thanks to the use of AI, offers vulnerable groups best practices in health and well-being. It includes categories such as healthy habits, prevention and mobility, strength and mobility, physical fitness, sports performance, and travel without discomfort.

### **Actions in financial inclusion.**

Línea Directa committed to the financial inclusion of underserved groups, as it believes that the essence of the insurance business is protecting individuals, businesses, and assets against all types of risks. In this way, insurance fulfills a fundamental social function, since through this safety net and the pooling of risks, it promotes the financial stability of society as a whole and helps to reduce inequalities and foster financial inclusion.

Aware of this role, Línea Directa seeks to align its social efforts with its knowledge and experience by creating a link between its insurance business and the Group's social contribution. Part of this social contribution is realized through the launch of products and services designed for different groups with special needs. With this, the company aims to increase social coverage for vulnerable groups and facilitate their access to insurance solutions.

Thus, among the different products that the Línea Directa Group has launched on the market with this vision are the following:

- **Health Insurance.** Línea Directa aims to make private healthcare more accessible to everyone, taking into account individual economic and family circumstances, through a flexible and affordable health insurance offering that adapts to the diverse needs of each group. This flexibility allows access for groups that have traditionally faced barriers to entry in the private healthcare sector. To this end, Línea Directa offers a range of products with different plans (Specialist, Comprehensive, and Dental) that meet the needs of those over 60 for access to medical tests, disease detection, and prevention. Having access to primary care, medical tests, and specialists, with or without co-payments, provides protection that facilitates the inclusion of this group in the private insurance sector. By the end of 2025, Línea Directa had over 7,977 senior customers among its total health insurance policyholders.
- **Personal Mobility Insurance.** Since 2021, Línea Directa has offered insurance for personal mobility vehicles (PMVs) such as electric scooters and bicycles. This policy is designed to cover this new form of urban mobility, which, in addition to being more sustainable, is more economical, thus improving mobility for many social groups. According to a study conducted by the Línea Directa Foundation, 74% of young people aged 18 to 24, a particularly vulnerable group from a road safety perspective, are the most likely to use these types of vehicles. Furthermore, the Spanish Directorate General of Traffic (DGT) has repeatedly stated its intention to require mandatory insurance for riding PMVs, which could effectively exclude a significant number of users due to insufficient purchasing power. Therefore, the policy is offered at a very affordable price and can be purchased on demand, either to cover a single trip under an "on/off" (pay-per-use) model or for a full year. In this way, the product adapts to a pay-per-use model, providing coverage to users at a very low cost: less than € 39 per year with an annual payment plan and € 0.02 per minute with a pay-per-use plan. Due to new mobility regulations for scooters and bicycles, this insurance will be updated in 2026.

- **Coverage for accessories on vehicles adapted for people with functional diversity.** Adapted cars are those with a series of modifications that allow people with reduced mobility to drive. This group requires very specific accessories such as telescopic ramps, lifting platforms, manual controls that replace pedals, etc. Línea Directa, through its car insurance, specifically covers these approved accessories for drivers who need to modify their vehicle to drive. In this way, the company responds to the needs of this group and expands its car insurance coverage to fulfill its commitment to financial inclusion. As of the end of 2025, a total of 89 customers living with this situation, which is generally overlooked by the market, have coverage for accessories on adapted vehicles.

### Non-financial support.

The Línea Directa Group is committed to promoting the sustainable development of the communities in which it operates, collaborating in improving people's quality of life and safety through its products and services.

This involves aligning business activity with social impacts strategy, promoting values such as road and home safety, healthy habits and well-being, as well as digital and professional development. Within the Línea Directa Group, there is freedom to carry out different social contribution activities, although these must always be linked to the Group's operating principles and corporate values. Furthermore, they must align with the Group's sustainability strategy and contribute to the commitments outlined in this policy.

To achieve the planned goals, which integrate and articulate the principles and values described above, the following different channels are available:

- **Corporate volunteering:** promotes social change through the direct involvement of employees in developing social contribution activities. Furthermore, it allows employees to channel their talent, time, and energy to benefit the community through their voluntary participation in initiatives proposed by the Group.
- **One-off or recurring philanthropic donations:** to support certain NGOs or other institutions in their social work with the aim of fostering a more committed, humane and egalitarian society.
- **Community contributions:** whether monetary or in kind, to causes chosen by the Group in accordance with the principles of this Policy, as well as collaborations with NGOs or other community organisations in order to address different social needs that have been detected in the environments.

The Group also carries out awareness-raising, training, and sensitization activities related to its priority themes, aimed at its employees and other Stakeholders, in order to contribute to social development. In this regard, during 2025 Línea Directa channeled non-financial support to underserved groups through the following initiatives:

- **Fundación Integra:** initiatives aimed at people at risk of social exclusion with the goal of helping them find employment. In addition, to mark International Women's Day (March 8), Línea Directa provided training to a group of vulnerable women affiliated with this organisation on how to prepare for a job interview, including group activities. These initiatives include:
  - **Escuela de Fortalecimiento,** a job integration workshop for people at risk of exclusion with diverse profiles (migrants, ex-convicts, former drug addicts) in

which training is given on how to face a job interview or how to prepare a resume.

- **Integratech**, an initiative that aims to reduce the digital divide for people at risk of social exclusion, boosting their employability.
- **Integra-te**, a series of events held at the company's facilities in which corporate volunteers have given practical workshops on how to approach the world of work for people at risk of exclusion.
- Furthermore, to broaden the range of job options for young people at risk of exclusion or residents in supervised housing, the company held an open day for students of the **Fundación Norte Joven**, in which, among other activities, a job interview simulation was put into practice.
- In 2025, the Group also developed a program focused on reducing unwanted loneliness in older people, "**Bingo with Grandparents**", in which employees, through company volunteering, celebrate a breakfast with games on the premises with elderly residents in Tres Cantos (Madrid).

All the measures described above benefited a total of 74 people.

In addition to these initiatives, Línea Directa has continued to prioritize the accessibility of its communication channels within its 2025 Sustainability Plan, achieving accessibility certifications for both its corporate website and its Foundation's website. The former has received an improved rating, while the latter has obtained certification for the first time. Furthermore, a roadmap has been established to further enhance the accessibility of both websites, based on a specific audit focused on this issue.

### Awareness-raising activities

Línea Directa carries out important awareness campaigns in the areas of road safety and health. Each year, through its foundation, it conducts and disseminates three studies analyzing some of the most relevant aspects of road safety. These topics are chosen by its board of trustees from a list proposed by the organisation's experts. In addition, it also conducts a health study with the aim of promoting healthy habits in society.

In the insurance sector, Línea Directa published the report "**Vehicle Theft in Spain (2019-2023)**" in 2025, analyzing all car and motorcycle thefts recorded in recent years. The aim was to raise public awareness of a problem that can directly affect drivers' mobility and assets. The study, which received widespread media coverage, analyzed more than 150,000 vehicle thefts in Spain during the period studied, of which almost 70% remained unsolved. Furthermore, preliminary figures for 2024 indicated that the numbers continued to rise, with more than 33,000 vehicle thefts, representing a 0.7% increase over the previous year. The study also identified the most frequently stolen car and motorcycle models based on the company's own data.

In the health sector, the Group launched the report "**CyberchondrAI: The Dangers of Digital Self-Diagnosis**," which, among other things, analyzed how AI tools (such as ChatGPT and Gemini) have solidified a new practice: digital self-diagnosis. The report, which received significant media coverage, describes how more and more people are turning to these sources to interpret symptoms and make decisions about their health. In fact, two out of three people regularly use these resources to consult on health-related matters.

In the area of road safety, the Línea Directa Foundation launched three studies in 2025. The first of these addressed motorcycle accidents, with alarming results: between 2014 and 2023, more than 4,000 motorcyclists died in traffic accidents, representing a 44% increase between those two years. Furthermore, fatal accidents involving motorcycles increased by 74%, a much higher increase than that experienced by passenger cars (21%). During the same period, more than 330,000 motorcyclists were injured, of whom approximately 31,500 (an 8% increase over the period) required hospitalization.

The second study of the year focused on pedestrians, the largest and most vulnerable group in road safety. The report concluded that in the last decade, almost 3,500 people had died in Spain as victims of pedestrian accidents.

In 72% of these claims, the pedestrian had not committed any infraction, although 41% of the pedestrians killed had consumed alcohol, drugs, or psychotropic medications—three substances that significantly impair reflexes and perception. There is also concern about the “**tech pedestrian**,” young people aged 18 to 25 who use mobile phones and headphones while walking in university or leisure areas, which increases the risk of having an accident.

Finally, the third study of the year focused on accidents and the **risks associated with driving in adverse weather conditions**, which have been present in more than 148,000 accidents in the last 10 years, resulting in almost 20,000 victims, more than 1,800 deaths, and nearly 190,000 injuries. The report was supplemented by a survey analyzing drivers' behavior and perceptions in these types of events.

In 2025, the Foundation also celebrated the 22nd edition of the **Road Safety Journalism Award**, recognizing the best articles and reports on road safety, always with the aim of raising public awareness about the need for responsible driving. This year's edition, which broke participation records, awarded prizes to the team from the DGT's (Spanish Directorate General of Traffic) Traffic and Road Safety magazine in the Print and Online Media category; Isabel Salvador, from Cadena SER radio, in the Radio category; and Beatriz Correal, from La Sexta television channel, in the Television category.

The Solidarity Award was given to the Motorcyclists' Platform for Road Safety, in recognition of its two decades of commitment to the protection and safety of motorcyclists. Meanwhile, the Military Emergency Unit was honored with the Road Safety Honorary Award for its outstanding operational work and its constant commitment to road safety and the protection of citizens in emergency situations, with special mention of its work in the recovery and clearing of roads after the recent DANA storm that devastated the Valencian Community.

The **11th edition of the Entrepreneurs and Road Safety Award** was also held, recognizing the best entrepreneurs whose ideas and projects can contribute to reducing the number of road fatalities. In the 2025 edition, LiveLink Ventures won with KOMOBI, an eCall device for motorcycles that detects accidents in seconds, automatically alerting emergency services and sending the exact location of the injured person. This reduces response time for medical services and improves the quality of care received by accident victims.

The winner of the competition, chosen from 63 candidates, will receive a prize of € 20,000 net, without any co-investment or additional funding, as well as training, mentoring and the possibility of accessing investment rounds.

In 2025, the Foundation also carried out several social action initiatives focused on raising awareness about the **risks of drinking and driving**, including two roundtables with the participation of key Stakeholders in the fight against traffic accidents, such as government agencies, the Civil Guard, victims, and journalists. These actions were complemented by various games and contests on social media and the creation and distribution of a press release with key data on accidents involving alcohol.

## Metrics and targets

### MDR-M. Metrics in relation to material sustainability matters.

In addition to the performance and resource parameters outlined in the MDR-A, it is worth noting that 2.35% of total net written premiums for 2025 were generated from sustainable products, compared to 1.7% in the previous year. This includes policies for electric and plug-in hybrid vehicles, premiums for illegal occupation insurance, net written premiums for personal mobility insurance, and premiums for solar panel insurance. This increased percentage demonstrates the Línea Directa Group's commitment to developing sustainable products and their adaptation and resilience to the market.

### MDR-T. Tracking effectiveness of policies and actions through targets.

The Board of Directors approves the Línea Directa Group's Sustainability Policy and bears ultimate responsibility in this area; it monitors its compliance, ensures respect for laws and regulations in its dealings with Stakeholders, guarantees good faith in its obligations and contracts, and ensures adherence to best practices in the conduct of its business. This policy is developed and complemented by strategic sustainability plans and the various internal policies approved within the Group, which are directly related to the established core principles of action.

These plans set goals and targets that are monitored by the Appointments, Remuneration, and Corporate Governance Committee. This Committee reviews compliance with this policy annually and reports on the progress made in implementing the Sustainability policy and strategy to the Board of Directors, as detailed in the corresponding Annual Corporate Governance Report. Furthermore, Línea Directa 's Sustainability Committee reports to the Appointments, Remuneration, and Corporate Governance Committee at least annually on the degree of compliance with the actions outlined in the Sustainability Plan and the ESG indicators, goals, and targets.

The Product Control and Governance Policy, for its part, takes into account, among other aspects, the design of ESG products. This policy, approved by the Board of Directors, is followed by the Product Committee in its actions. This Committee is responsible for supervising, evaluating, and approving whether a product or service should be launched on the market, considering not only sustainability screening but also a matrix of requirements that the product must meet.

Línea Directa 's **2023-2025 Sustainability Plan** included, as a sustainability objective for the Long-Term Incentive Plan (LTP), the launch of 4 products, services or coverages related to sustainability in any of the lines of business in 2023-2025.

Additionally, the 2025 Sustainability Plan included within the social axis the action of launching a product related to sustainability.

Both plans have been successfully completed with the achievement of the goals and the launch of the products and services related to sustainability.

## Cybersecurity and data protection (Entity-specific)

### Governance

#### GOV-1. The role of the administrative, management and supervisory bodies.

At Línea Directa, the Information Security function resides in the **Cybersecurity department** through the **CISO (Chief Information Security Officer)**, framed within the **Technology and Cybersecurity Area**.

This department is made up of four specific work areas:

- Defensive cybersecurity
- Cybersecurity architecture
- Offensive Cybersecurity
- Governance, Risk and Compliance (GRC)

Likewise, the Cybersecurity department is committed to continuously improving the Company's maturity in terms of cybersecurity and its security management program, through the definition of goals on a regular basis, and by reporting at least annually to Management on its status, so that the results can be monitored.

At least annually, the management team at Línea Directa receives specialized training in cybersecurity and technological risks, designed to strengthen their supervisory and decision-making capabilities. This training aligns with the requirements of the DORA Regulation, ensuring that management has the necessary knowledge to assess risks and ensure resilience.

The CISO maintains a constant reporting role with the Risk Committee, providing monthly updates on any significant changes in the risk landscape. Additionally, on a quarterly basis, the CISO presents a comprehensive report summarizing the results of assurance activities, operational resilience testing, the status of risks and controls, as well as the most relevant impacts and the corrective actions taken.

As part of the strategic commitment, the CISO presents the Cybersecurity Strategic Plan annually to the Board of Directors, aligned with identified risks, current regulations, and industry best practices. Additionally, the CISO reports at least annually, or more frequently as circumstances warrant, to the Audit and Compliance Committee on the program's progress and any related matters the Committee deems relevant.

The chair of the aforementioned Commission has experience in risk identification and internal control systems, and one of its members has headed the Corporate Security department at another organisation. The Commission will, in turn, report to the Board of Directors on a regular basis for its proper oversight.

Therefore, as established by the Regulations of the Board of Directors, ultimate responsibility for cybersecurity rests with the Audit and Compliance Committee of the Board of Directors of Línea Directa Aseguradora. These regulations stipulate that the responsibilities of this body are to understand, supervise, and evaluate the preparation process and the integrity of financial and Non-Financial Information, as well as the control systems and the management of the Group's financial and non-financial risks, including operational and technological risks, and therefore, the oversight of the cybersecurity strategy.

The aforementioned Committee is made up of the following members of the Board of Directors: Rita Estévez Luaña (Chair), Ana María Plaza Arregui (Member), Alfonso Botín-Sanz de Sautuola y Naveda (Member), and Pablo González-Schwitters as non-director secretary. As established in the Directors' Competency Matrix of Línea Directa, the members responsible for overseeing the Group's cybersecurity strategy have expertise in the area of cybersecurity.

Regarding data protection, the Board of Directors, through the Audit and Compliance Committee, is the body responsible for the overall oversight of the Group's main risks, including data risks. The Risk Management Department submits a quarterly risk report to the Audit and Compliance Committee, and also reports on an ad hoc basis whenever a matter arises that the Committee needs to be aware of. The Group also has a Data Protection Officer, appointed by the Board of Directors, who ensures compliance with the Group's data protection policy.

Finally, it is important to note that the governing, management and supervisory bodies and senior executive management oversee the establishment of targets related to material issues, risks and opportunities, as further detailed in subchapter MDR-P Policies adopted to manage material sustainability issues.

Together, this framework ensures that cybersecurity and data protection principles are effectively integrated into the business strategy, under active oversight and robust governance, aligned with privacy standards, information security, and the applicable regulatory framework. Chapter ESRS 2, Governance, details information of the composition and diversity of the members of its governing, management, and supervisory bodies, and describes how these bodies determine whether the appropriate capabilities and expertise are available, or will be developed, to oversee sustainability issues.

## Strategy

### **SBM-3. Material impacts, risks and opportunities and their interaction with the strategy and business model.**

Línea Directa Aseguradora, through the double materiality analysis carried out throughout 2024, whose methodology is indicated in chapter ESRS 2 Impacts, risk and opportunity management, has identified two material risks for the Group, which have been re-evaluated in 2025 through a consultation with the Sustainability working group, as shown in subchapter IRO-1 Description of the processes to determine and evaluate impacts, risks and opportunities of relative importance related to cybersecurity and data protection.

These issues are related to and linked with their strategy and business model. Information Security is among the strategic lines of Línea Directa 's Fifth Sustainability Plan 2023-2025. These lines prioritize actions related to ESG (Environmental, Social, and Governance) matters and lead to concrete actions that define the aforementioned Plan, aiming to connect the business strategy with the security strategy and seek a balance between them.

Cybersecurity continues to be a strategic line of action within the new Sustainability Plan 2026-2028.

The **potential material risks** are linked to the Group's reliance on a robust information protection system that safeguards the Group's digital activity and its relationships with both its own personnel and its entire value chain. This system is essential to address the growing challenge of **cybercrime** and minimize management errors that could lead to data breaches

or exposure to cyberattacks. To mitigate these risks, the company implements training and development programs that strengthen employee skills, ensuring their alignment with market demands and current regulations.

Furthermore, policies with clearly defined principles, procedures, and commitments are also implemented. In this way, both competitiveness and organisational resilience are reinforced.

In this regard, the Risk Management department, together with the Data Protection Office (DPO), has designed a data protection risk map that specifies and monitors the controls established and agreed upon with the responsible department. If, through the corresponding audits or testing carried out by the Risk Management department, the risks lack effective controls or are not functioning, the responsible department is required to submit an action plan for implementation within the established deadlines.

According to the **Solvency II Directive**, the group performs an annual analysis, ORSA (own risk and solvency assessment) to determine short- and long-term risks in accordance with internal capital needs and thus ensure that technical provision requirements and regulatory capital requirements will be met.

Within the universe of risks considered in ORSA, cybersecurity risk has been analyzed, which is not calculated using the standard CSO formula. After applying a global cybersecurity attack scenario to the baseline scenario, the difference in capital expenditure reached € 8.7 million.

## Impacts, risk and opportunity management

### **IRO-1. Description of the processes for determining and evaluating impacts, risks and opportunities of relative importance related to cybersecurity and data protection.**

As developed in greater detail in chapter ESRS 2 Impacts, Risk and Opportunity Management, the following process was followed in 2024 for the assessment of impacts, risks and opportunities:

1. Firstly, a context analysis was carried out, using both internal and external sources of information, to obtain a first approximation of potentially material issues from a cross-cutting sustainability perspective.
2. Secondly, a preliminary identification of the topics and Sub-topics was carried out, defined from the list of Topics, Sub-topics and Sub-sub-topics proposed in ESRS 1 AR 16 and from the Company's previous materiality.
3. Thirdly, the Impacts, Risks and Opportunities (IROs) have been identified, examining and considering the information present in the sources used in the first phase of the project.
4. Fourthly, based on the quantitative data that has been given to each IRO, the consultations carried out with the different Stakeholders and the Group's management framework, the materiality value of each of them has been obtained.
5. Finally, the material topics have been obtained, identifying 11 material environmental, social and governance (ESG) issues.

| Sub-topic                   | Sub-topic linked to ESRS | Positive / Negative Risk / Opportunity | IRO Description                                                                                      | Value chain                                                                          |
|-----------------------------|--------------------------|----------------------------------------|------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| Cybersecurity               | Entity-specific          | Risk                                   | Vulnerability to cyberattacks resulting from inadequate management of information protection systems | Upstream - Suppliers and shareholders / investors<br><br>Downstream - Own operations |
| Privacy and data protection | Entity-specific          | Risk                                   | Stakeholder data breaches caused by system failures or weak oversight                                | Upstream - Suppliers and shareholders / investors<br><br>Downstream - Own operations |

In the area of cybersecurity and data protection, two risks were identified as material; these have been determined through a double materiality analysis whose methodology is described in greater detail in chapter ESRS 2 Impacts, risks and opportunities management.

These risks affect both internal operations and the value chain, specifically impacting key Stakeholders such as suppliers and shareholders/investors. The analysis was conducted using information from the Group, which allowed for an assessment of the relevance and impacts of these risks within the organisational context.

Furthermore, it is important to highlight that for the assessment of the IROs, consultations with four of the main Stakeholders for Línea Directa have been taken into account through their participation in surveys and, in a complementary manner, focus groups have been carried out with the employees of the Group, as well as interviews with members of the management of Línea Directa Aseguradora.

The objective of these surveys is to incorporate the opinion of the Stakeholders in the assessment of the topics and Sub-topics and to be able to obtain a more comprehensive result.

In 2025, a consultation was carried out with the Sustainability Working Group, which allowed for an update of the Double Materiality exercise initially performed.

As a result of this consultation, the Línea Directa Group has maintained its initial list of Impacts, Risks, and Opportunities, as well as its list of material topics and Sub-topics, for 2025. This outcome has been submitted to the Sustainability Committee for approval.

### **MDR-P. Policies adopted to manage material sustainability matters.**

The Línea Directa Group, as part of its commitment to cybersecurity and the privacy of its customers, employees, and suppliers, and to the confidentiality of its operations, works to comply with the provisions of the General Data Protection Regulation 2016/679 (GDPR), Organic Law 3/2018 on the Protection of Personal Data and Guarantee of Digital Rights, and reference standards such as ISO/IEC 27001 and ISO/IEC 22301. Based on this, various policies have been approved and published to ensure compliance with the regulations and guidelines set by Spanish and European regulators.

Through these policies, the Línea Directa Group maintains its firm commitment to respecting the fundamental right to the protection of personal data of data subjects, generating trust and security within the organisation. The Technology and Cybersecurity Department and the CISO,

as head of the Cybersecurity department, make the cybersecurity policies that employees must be familiar with (information security policy, rules for using information systems, etc.) available on the corporate intranet. These policies are linked to the risks identified in the Double Materiality analysis and detailed in subsection IRO-1, "Description of processes to identify and assess material impacts, risks, and opportunities related to cybersecurity and data protection."

Currently, the following policies have been approved and published:

- **Cybersecurity policy.**

This policy, approved in January 2025, **replaces** the previous **Information Security policy**.

Its purpose is to establish the organisational and procedural framework for developing, implementing, monitoring, reviewing, maintaining, and improving the company's cybersecurity. This policy aims to provide an adequate level of security to preserve and/or mitigate the risks affecting Línea Directa 's information assets.

The primary objective of this Policy is to establish a comprehensive framework for the governance and control of cybersecurity at Línea Directa, providing an appropriate level of maturity to effectively manage cybersecurity threats and risks. To this end, it defines the general principles, responsibilities, and corporate vision in this area, with a commitment to protecting the confidentiality, integrity, availability, traceability, and authenticity of the systems that host Company information.

The approval and modification of this policy is the responsibility of the Board of Directors, which guarantees its alignment with the strategic goals and the institutional commitment to security.

Additionally, the Corporate Cybersecurity Department maintains a Cybersecurity Policy Framework, which outlines the rules and operating procedures governing key aspects related to information and systems protection. These documents, which all employees are required to know, are available on the corporate intranet, facilitating their consultation and compliance.

This policy also ensures compliance with legal, contractual and international standards relating to cybersecurity, reinforcing Línea Directa 's commitment to responsible, proactive and resilient management of technological risks.

The policy applies to all business units of the Línea Directa Group and affects all group personnel, as well as service providers.

This policy is communicated to the members of Línea Directa and is available to the organisation's Stakeholders through the intranet and the corporate website.

- **General Data Protection Policy.**

This policy defines the principles and procedures for processing personal data in compliance with the **General Data Protection Regulation** (GDPR) and Spanish law, ensuring the protection of digital rights. It applies to all companies within the group acting as data controllers, including Línea Directa Asistencia and other subsidiaries, and to all operations, including those of suppliers. The Board of Directors is ultimately responsible for approving and ensuring its implementation, while employees and collaborators are obligated to comply with it.

The policy establishes clear mechanisms for data subjects to exercise their rights of access, rectification, erasure, objection, restriction of processing, and data portability, managed through the Data Protection Office. It also details the channels for exercising these rights and the security measures and training implemented to protect data. According to the Privacy Policy, employees and collaborators who fail to comply with the obligations set forth therein will be subject to applicable disciplinary, contractual, or other sanctions.

The **Privacy Policy System** is integrated into the risk/compliance management of the entire group. Línea Directa pays particular attention to this matter, including its risk map, which outlines all the measures the organisation has implemented to protect information and data.

The policy is published on the intranet and the corporate website to ensure its accessibility to Stakeholders.

This Policy is currently under review and will be updated by the end of this fiscal year.

- **Commercial Privacy Policy.**

The policy, published on Línea Directa 's commercial website, provides detailed information on the processing of personal data of customers and potential customers. It includes the identification of the data controller, the contact details of the Data Protection Officer, the purposes of the processing, the legal bases for processing, the recipients of the data, any international transfers, and the applicable safeguards. It also details the data retention periods or the criteria used to determine them, as well as the rights of data subjects, such as access, rectification, erasure, objection, restriction of processing, data portability, and the right to contest automated decisions.

The policy explains that the Línea Directa Group acts as the data controller, highlighting its commitment to transparency, and includes the management of common systems in the insurance sector, for which Línea Directa jointly responsible and adheres to the UNESPA Code of Conduct.

Its scope covers users, potential users, and customers, ensuring regulatory compliance at all stages of data processing. The entire Directa Group is responsible for implementing this privacy policy and processing personal data, following the guidelines of the Data Protection Office.

At its highest level, the Línea Directa Group's Privacy Policy must be complied with by the Board of Directors of Línea Directa Group SA, as it is the body that approves the policy and ensures its implementation and compliance within the organisation.

This Policy is currently being reviewed and updated in order to adapt it to the new processing purposes, as well as to provide it with greater transparency and clarity.

- **Internal Training and Awareness Policy.**

It establishes the general principles to ensure that all staff with access to personal data receive mandatory training and regular updates in compliance with current regulations. The policy covers initial training and ongoing refresher courses on basic data protection principles and current regulations, as well as activities to raise awareness of the importance of regulatory compliance.

This policy applies to all companies within the group and is overseen by the Data Protection Office, which coordinates a comprehensive training and awareness program. This policy is published on the Group's intranet for all employees to review.

The Steering Committee, at the request of the Data Protection Office, will ensure compliance with the training obligations established in this Policy.

## **MDR-A. Actions and resources in relation to sustainability issues of relative importance.**

### **Actions in the field of cybersecurity.**

Over the past few years, there has been an increase in the number of cyberattacks, accentuated by the presence of organized crime groups and specific actors focused on areas of the financial sector.

Digitalisation presents a challenge and new opportunities for companies, requiring them to face new risks, including those related to cloud security, the increased risk surface, and the management of risks associated with service providers.

To address these new challenges, Línea Directa Aseguradora has strengthened its efforts in identifying, detecting, protecting against, and responding early to cyberattacks, in order to guarantee effective protection of the information assets of Línea Directa Aseguradora's customers, suppliers, and employees.

In 2025, the cyber threat framework has continued to intensify, particularly in the financial sector, where organized groups and specialized actors have increased their activity. Digitalisation and the adoption of cloud technologies continue to expand the attack surface, necessitating more robust management of technology risk and critical suppliers.

In this context, Línea Directa continues to strengthen its cybersecurity model with a focus on consolidation and improvement, aimed at identifying, protecting against, detecting, and responding early to potential cyberattacks. The objective remains to ensure the protection of customer, employee, and supplier information, guaranteeing secure and continuous delivery of the services offered by the Group.

Throughout 2025, the improvements initiated in 2024 have been consolidated and new strategic initiatives have been launched that strengthen digital operational resilience.

In line with the 2024 Framework, Línea Directa will maintain its alignment with the main industry standards and best practices in 2025. The cybersecurity model continues to be based on the **NIST Cybersecurity Framework**, which serves as a reference framework for structuring identification, protection, detection, response, and recovery capabilities. Compliance with the DORA Regulation is also being strengthened, consolidating a consistent regulatory approach and integrating digital operational resilience requirements into corporate processes. This common framework ensures the methodological consistency of the model and guides the ongoing evolution of cybersecurity within the Company.

### **Restructuring and strengthening of the Cybersecurity department.**

In 2024, a specific Governance, Risk & Compliance (GRC) area was created within the Cybersecurity department, responsible for cybersecurity governance, risk management, regulatory compliance, and monitoring and tracking of the cybersecurity strategy.

During 2025, a new structure was implemented in the Cybersecurity area to formalize and organize the functions already being performed in previous years into specialized teams, creating three additional units: Cybersecurity Architecture, Offensive Cybersecurity, and

Defensive Cybersecurity. This organisation allows for greater functional clarity, specialization, and alignment with industry best practices and the requirements of the DORA Regulation.

Additionally, to strengthen the GRC team's functions, a GRC Office was established in 2025 to provide direct support to the internal team and expand its capabilities for task execution. This office has contributed to optimizing key processes within the area, improving visibility into cybersecurity risks, strengthening the modeling and monitoring of strategic initiatives, and consolidating more effective and transparent governance of the cybersecurity program.

The restructuring and reinforcement actions have involved an investment of € 385,584 euros.

### **Cybersecurity maturity.**

Continuing the work began in 2024, Línea Directa has made significant progress in improving its cybersecurity maturity level throughout 2025. This effort has focused on strengthening digital operational resilience, adapting to a more complex threat environment, and ensuring compliance with regulatory requirements, including the Regulation.

A comprehensive evaluation of the existing model, including its governance and operational functioning, has been conducted. This evaluation has allowed for an analysis of the Company's maturity level according to the NIST Cybersecurity Framework, the incorporation of an industry benchmark, and the definition of a three-year strategic plan along with a new operating model and its transition plan. This evaluation was carried out in conjunction with the department's restructuring in 2025, enabling more precise prioritization of key actions for the coming years.

On the other hand, in 2025 other relevant initiatives have been implemented, such as the optimization of cybersecurity governance, the strengthening of vulnerability management, the promotion of staff awareness and advanced incident preparedness through drills and DFIR capabilities.

In addition, initiatives have been launched to improve cybersecurity in projects, enhance the classification and protection of information, and optimize SIEM capabilities.

These actions consolidate a proactive culture and guarantee the protection of critical assets against an increasingly complex threat environment, dedicating to this important action, in addition to internal resources, € 62,100 in services.

### **Third-Party Cybersecurity Management.**

Continuing with the activities initiated in 2024, Línea Directa has strengthened in 2025 the management of cybersecurity risks associated with third parties, an area especially relevant within the framework of the **DORA Regulation and the Company's cyber resilience model**.

These actions include an early risk analysis of the services that will be provided by third parties, incorporating the evaluation of technical and organisational cybersecurity requirements in projects that require it.

Additionally, cybersecurity requirements have been contractually strengthened, incorporating specific clauses that offer greater coverage and protection against risks associated with third parties.

Furthermore, reviews of critical suppliers to the Company have been planned and implemented to verify the effectiveness of the technical and organisational measures

implemented, and continuous monitoring of the performance of relevant third parties has been strengthened, ensuring the updating of security parameters and the mitigation of operational and technological risks.

These actions consolidate a preventive, homogeneous third-party management model aligned with the regulatory framework, reinforcing the resilience of Línea Directa 's digital supply chain.

Awareness actions within the organisation and training and development for employees.

In 2025, the new Cybersecurity Culture Plan was launched, building on the training and awareness initiatives developed in 2024 and strengthening employee preparedness to address digital risks. The plan aims to promote secure behavior throughout the organisation and ensure the adequate protection of Línea Directa 's information and systems in an increasingly sophisticated threat environment. As part of this effort, a dedicated cybersecurity training platform has been designed and implemented, facilitating ongoing training and the consolidation of best practices. This platform is developed in collaboration with external specialists to ensure an approach aligned with industry's best practices.

The Plan, which began in early 2025, includes various training and awareness actions adapted to the different profiles of the Company (Management, middle management, coordinators, technical teams and operators) using face-to-face and digital formats, training modules, infographics and practical simulations of phishing, smishing, vishing or QRising.

The topics covered included key aspects such as the fundamentals of cybersecurity, information classification and protection, regulations and compliance, as well as specific best practices for developers.

Furthermore, all actions have been accompanied by metrics to assess their impacts and define corrective measures when necessary.

The total investment amounts to € 57,766.70.

### **Vulnerability management.**

During 2025, Línea Directa significantly expanded its vulnerability management and technological risk exposure capabilities. This initiative, building on previous efforts to strengthen the protection of critical assets, has enabled the company to evolve towards a more automated, scalable model aligned with industry's best practices.

The project has included the configuration of essential capabilities for comprehensive security management. This has involved deploying agents on critical servers, probes on internal networks, and specific connectors for the main cloud environments. Furthermore, the platform has been integrated with the CMDB, corporate ticketing systems, and reporting tools, ensuring efficient and centralized operations.

With these actions, the Company now has complete real-time visibility of its exposure surface, strengthening its ability to proactively detect, prioritize, and manage vulnerabilities.

The investment associated with the project amounts to € 61,646.

### **Incident preparedness.**

Responding to cybersecurity impacts is an essential element in ensuring Línea Directa 's operational resilience, especially in an environment where threats are increasingly sophisticated and have a greater impact.

The project included the design and updating of incident management protocols, the creation of a virtual war room as a centralized coordination environment, and specific training for the team responsible. In addition, a high-impacts cyber incident simulation was planned and executed, aligned with the NIST Cybersecurity Framework lifecycle and the requirements of the DORA Regulation, and subsequently included a results report and a set of improvement actions.

Additionally, a support service is planned for the evolution of the service over the next three years, facilitating the continuous improvement of processes and response capabilities.

The project has received an investment of € 23,421.

### **Data protection actions.**

The Data Protection Office (DPO) of the Línea Directa Group has carried out various actions in 2025 to guarantee compliance with data protection rights.

In 2025, the Data Protection Office actively contributed to the implementation of the company's project to obtain customers' digital footprints, with the aim of obtaining their consent and enriching the data. The Cookie Policy has been updated to reflect these new requirements.

Specialized training has been provided to Project Managers on the importance of complying with the Privacy by Design and by Default Principle, informing the Data Protection Office of any initiative or project that may involve the processing of personal data, in order to implement the necessary measures and controls to mitigate any potential risks arising from such processing. Furthermore, these training sessions have emphasized to Project Managers the importance of conducting audits of suppliers to assess their compliance with data protection regulations, namely the GDPR and the LDPOGDD.

Within the framework of Artificial Intelligence governance, the Data Protection Office actively participated in all of the company's projects incorporating AI systems throughout 2025, acting as a guarantor of compliance with data protection principles by design and by default. Its work focuses on ensuring that any AI-based processing is developed and used responsibly, ethically, and reliably, avoiding biases or discrimination that could affect data subjects.

Furthermore, in 2025, the Línea Directa Group continued its commitment to transparency and the dissemination of best practices in data protection, driven by its adherence to the Spanish Data Protection Agency's (AEPD) Digital Pact in 2021. Awareness-raising initiatives were undertaken, such as the campaign on children's responsibility online, along with collaboration with internal and external communications teams to promote best practices in data protection, such as protecting minors on social media and addressing "egosurfing." These actions reinforce the company's commitment to privacy and security in the digital environment.

Finally, the Data Protection Office continued to conduct annual audits throughout 2025 regarding compliance with the "**Data Protection Items in the Telephone Channel**". These audits verify that the procedures implemented by the various departments adhere to the items established by the Data Protection Office and that these procedures are followed by operators in telephone interactions with customers. The procedures revolve around the obligations to accurately identify customers, properly obtain their commercial consent, and provide customers with the necessary information regarding the processing of their personal data. In addition to safeguarding customer privacy, this process raises employee awareness that privacy and the protection of personal information must be present in all customer interactions, from the initial contract to the management of any contractual relationship.

As confirmation that these audits bring great value to the development of direct activity with customers, it has been agreed that this audit, conducted by the Data Protection Office, will be recognized as an assurance work of the Company itself.

These audits assess the proper execution of obligations regarding commercial information, positive identification, third-party authorizations, consent collection, and consultation of external databases, in order to ensure a compliance rating of level A (100%) or B (90%-100%). In the event of ratings C (70%-90%) or D (0%-70%), action plans are established with implementation deadlines not exceeding 12 months. Key Stakeholders in this initiative include the Data Protection Office, the Secretary General, the management of the areas involved, the external audit provider, the Compliance Committee, and the Standing Risk Committee.

The economic investment in these audits amounted to € 49,855 plus VAT in 2025.

## Metrics and targets

### **MDR-M. Metrics in relation to material sustainability matters.**

During the year 2025, in relation to sanctions in the field of data protection, the Línea Directa Group has suffered a security breach, produced in the environment of a service provider, which, in accordance with the provisions of art 33 of the GDPR, was duly reported to the Spanish Data Protection Agency, who has reported its filing.

### **MDR-T. Tracking effectiveness of policies and actions through targets.**

In 2025, the Línea Directa Group has established and made progress on several strategic targets related to cybersecurity and data protection, meeting the requirements relating to information and sustainability.

#### **On the cybersecurity front.**

Línea Directa 's Information Security Policy ensures that the information security management program is regularly updated, reviewed, tested, and improved, at least annually and in the event of significant changes in regulations, personnel, facilities, processes, suppliers, markets, technology, or organisational structure. Furthermore, the Cybersecurity department is committed to continuously improving the Company's information security management program by defining goals on a regular basis.

Additionally, as part of the cybersecurity training and awareness plan, phishing campaigns have been launched to all employees, mimicking the real social engineering techniques that attackers use daily against companies and people.

Finally, Línea Directa 's Internal Audit area has carried out several external intrusion exercises.

The security goals for 2025, developed within the strategic plan and submitted to the board for approval, have been defined in accordance with the NIST CSF v2 standard, including improvements in governance and oversight frameworks, information identification and classification, implementation of controls to protect digital assets, improved proactive detection of alerts and vulnerabilities, and incident preparedness and containment processes.

To this end, a structure based on offensive and defensive security areas will be provided to mitigate and resolve potential impacts in an appropriate manner.

## Regarding data protection.

To monitor the effectiveness of the policies, the **Data Protection Office** has actively participated in the following company projects.

Protocol for Audits of Compliance with Legal Items for Data Protection: Telephone Channel.

The objective of this protocol is to guarantee compliance with the regulations established by the Data Protection Office (DPO). This protocol assesses the correct execution of obligations regarding commercial information, positive identification, third-party authorizations, consent collection, and consultation of external databases, in order to ensure a compliance rating of level A (100%) or B (90%-100%). In the event of ratings C (70%-90%) or D (0%-70%), action plans are established with implementation deadlines not exceeding 12 months. Key Stakeholders in this initiative include the Data Protection Office, the Secretary General, the management of the areas involved, the external audit provider, the Compliance Committee, and the Standing Risk Committee.

The scope of this audit includes the main customer contact activities via telephone and follows an annual protocol, with reviews and audits planned during the first quarter of the year. The methodology includes annual authorization by the Secretary General, awarding audits to an external provider for monitoring and compliance verification, presenting findings, and preparing final reports, which are then submitted internally to management and the **Standing Risk Committee** if necessary. The results are evaluated using a rating scale that allows for the development of corrective action plans if performance falls below expected levels.

In addition to the aforementioned protocol, Línea Directa has other **data protection objectives** within the framework of various projects carried out by the Company.

Among them are:

- Firstly, the GDPR project has continued, aiming to implement a data retention and usage policy, adapting IT systems and archiving key information to reduce the risk of penalties and comply with the Data Retention Procedure. During 2025, the automation process for blocking and deleting personal data was carried out to comply with the principle of personal data retention. The project is being implemented through interdisciplinary working groups with regular follow-up meetings as needed, led by the project manager, and involves reviewing all the company's information systems, physical documentation, and predictive models.
- Secondly, the Consent Project aims to optimize consent management for commercial purposes, adapt to current cookie regulations, and create a more efficient ecosystem for online advertising investment. The project began in 2023, and during 2025, new opt-out brands and channels, as well as a preference center, were launched. Also in 2025, the Data Protection Office actively contributed to the launch of the project designed to obtain customers' digital footprints in order to obtain their consent and enrich the data. The Cookie Policy was updated accordingly. Similar to the GDPR project, this project is being developed through interdisciplinary working groups with regular follow-up meetings as needed, led by the project manager.
- Finally, the People Project aims to improve the quality of customer data and strengthen the subscription process by reviewing and cleaning personal data and adapting customer-related models. Throughout 2025, analyses and improvements were carried out on the affected processes to ensure compliance with the principle of accuracy and quality of personal data. Regular follow-up meetings were held with the dedicated working group.

The Data Protection Office's commitment for 2026 is to continue protecting privacy and ensuring compliance with applicable regulations.

To this end, ongoing training will be provided to all Company employees, both new hires and current staff. This training will be tailored to the needs of each department and each stage of the Company's operations.

We will continue to implement actions aimed at raising awareness and promoting privacy and data protection, particularly those stemming from our commitment to the **Spanish Data Protection Agency's Digital Pact**. We will inform and disseminate to Group employees all publications, news, and content related to data protection that may be of interest to the organisation.

The **Data Protection Office** will periodically review the Privacy Policies and internal procedures related to data protection, in order to comply with applicable regulations and the guidelines of the Spanish Data Protection Agency (AEPD) and the European Data Protection Board.

Furthermore, within the framework of governance for Artificial Intelligence, throughout 2026, the Data Protection Office will continue to actively participate in all company projects involving artificial intelligence systems, ensuring compliance with data protection principles by design and by default in all activities related to this innovative and disruptive new technology. The Data Protection Office will ensure that new data processing activities based on artificial intelligence systems are developed and used responsibly, ethically, and reliably, without bias or discrimination against data subjects.

During 2026, the Data Protection Office will continue to contribute to and support the business and development areas in fulfilling the execution plans of the Group's strategic projects, ensuring that all of them comply with the regulations regarding privacy and data protection.

# Annex I. Law 11/2018

## Employment

### 1. Total number and distribution of employees by gender, age, country and professional classification.

| Professional Group      | 2024         |              |              | 2025         |              |              |
|-------------------------|--------------|--------------|--------------|--------------|--------------|--------------|
|                         | Female       | Male         | Total        | Female       | Male         | Total        |
| 1. MANAGERS             | 41           | 38           | 79           | 39           | 35           | 74           |
| 2. EXPERT PROFESSIONALS | 169          | 179          | 348          | 166          | 195          | 361          |
| 3. PROFESSIONALS        | 388          | 258          | 646          | 384          | 253          | 637          |
| <b>4. STAFF</b>         | 811          | 539          | 1,350        | 795          | 520          | 1,315        |
| <b>Total</b>            | <b>1,409</b> | <b>1,014</b> | <b>2,423</b> | <b>1,384</b> | <b>1,003</b> | <b>2,387</b> |

| Age             | 2024         |              |              | 2025         |              |              |
|-----------------|--------------|--------------|--------------|--------------|--------------|--------------|
|                 | Female       | Male         | Total        | Female       | Male         | Total        |
| 1. < 30         | 144          | 130          | 274          | 153          | 121          | 274          |
| 2. >=30 and <50 | 866          | 651          | 1,517        | 789          | 621          | 1,410        |
| 3. >=50         | 399          | 233          | 632          | 442          | 261          | 703          |
| <b>Total</b>    | <b>1,409</b> | <b>1,014</b> | <b>2,423</b> | <b>1,384</b> | <b>1,003</b> | <b>2,387</b> |

### 2. Total number and distribution of work contracts by type.

| Type of contract | 2024         |              |              | 2025         |              |              |
|------------------|--------------|--------------|--------------|--------------|--------------|--------------|
|                  | Female       | Male         | Total        | Female       | Male         | Total        |
| Permanent        | 1,407        | 1,013        | 2,420        | 1,379        | 995          | 2,374        |
| Temporary        | 2            | 1            | 3            | 5            | 8            | 13           |
| <b>Total</b>     | <b>1,409</b> | <b>1,014</b> | <b>2,423</b> | <b>1,384</b> | <b>1,003</b> | <b>2,387</b> |

| Type of working day | 2024         |              |              | 2025         |              |              |
|---------------------|--------------|--------------|--------------|--------------|--------------|--------------|
|                     | Female       | Male         | Total        | Female       | Male         | Total        |
| Full-time           | 627          | 659          | 1,286        | 638          | 675          | 1,313        |
| Part-time           | 782          | 355          | 1,137        | 746          | 328          | 1,074        |
| <b>Total</b>        | <b>1,409</b> | <b>1,014</b> | <b>2,423</b> | <b>1,384</b> | <b>1,003</b> | <b>2,387</b> |

| Professional Group      | 2024         |           |              | 2025         |           |              |
|-------------------------|--------------|-----------|--------------|--------------|-----------|--------------|
|                         | Permanent    | Temporary | Total        | Permanent    | Temporary | Total        |
| 1. MANAGERS             | 79           | -         | 79           | 74           | 0         | 74           |
| 2. EXPERT PROFESSIONALS | 347          | 1         | 348          | 361          | 0         | 361          |
| 3. PROFESSIONALS        | 644          | 2         | 646          | 631          | 6         | 637          |
| <b>4. STAFF</b>         | 1,350        | -         | 1,350        | 1,308        | 7         | 1,315        |
| <b>Total</b>            | <b>2,420</b> | <b>3</b>  | <b>2,423</b> | <b>2,374</b> | <b>13</b> | <b>2,387</b> |

| Age             | 2024         |           |              | 2025         |           |              |
|-----------------|--------------|-----------|--------------|--------------|-----------|--------------|
|                 | Permanent    | Temporary | Total        | Permanent    | Temporary | Total        |
| 1. < 30         | 271          | 3         | 274          | 264          | 10        | 274          |
| 2. >=30 and <50 | 1,517        | -         | 1,517        | 1,407        | 3         | 1,410        |
| 3. >=50         | 632          | -         | 632          | 703          | 0         | 703          |
| <b>Total</b>    | <b>2,420</b> | <b>3</b>  | <b>2,423</b> | <b>2,374</b> | <b>13</b> | <b>2,387</b> |

| Professional Group      | 2024         |              |              | 2025         |              |              |
|-------------------------|--------------|--------------|--------------|--------------|--------------|--------------|
|                         | Full-time    | Part-time    | Total        | Full-time    | Partial      | Total        |
| 1. MANAGERS             | 79           | -            | 79           | 74           | 0            | 74           |
| 2. EXPERT PROFESSIONALS | 323          | 25           | 348          | 338          | 23           | 361          |
| 3. PROFESSIONALS        | 545          | 101          | 646          | 537          | 100          | 637          |
| <b>4. STAFF</b>         | <b>339</b>   | <b>1,011</b> | <b>1,350</b> | <b>364</b>   | <b>951</b>   | <b>1,315</b> |
| <b>Total</b>            | <b>1,286</b> | <b>1,137</b> | <b>2,423</b> | <b>1,313</b> | <b>1,074</b> | <b>2,387</b> |

| Age             | 2024         |              |              | 2025         |              |              |
|-----------------|--------------|--------------|--------------|--------------|--------------|--------------|
|                 | Full-time    | Part-time    | Total        | Full-time    | Part-time    | Total        |
| 1. < 30         | 66           | 208          | 274          | 86           | 188          | 274          |
| 2. >=30 and <50 | 763          | 754          | 1,517        | 709          | 701          | 1,410        |
| 3. >=50         | 457          | 175          | 632          | 518          | 185          | 703          |
| <b>Total</b>    | <b>1,286</b> | <b>1,137</b> | <b>2,423</b> | <b>1,313</b> | <b>1,074</b> | <b>2,387</b> |

### 3. Annual average of permanent, temporary and part-time contracts by gender, age and professional category.

| Professional Group      | 2024           |                |                | 2025           |                |                |
|-------------------------|----------------|----------------|----------------|----------------|----------------|----------------|
|                         | Female         | Male           | Total          | Female         | Male           | Total          |
| 1. MANAGERS             | 39,6           | 36,0           | 75,6           | 38,7           | 36,2           | 74,8           |
| 2. EXPERT PROFESSIONALS | 166,2          | 179,3          | 345,4          | 168,2          | 193,4          | 361,6          |
| 3. PROFESSIONALS        | 389,3          | 259,8          | 649,1          | 380,9          | 255,5          | 636,4          |
| <b>4. STAFF</b>         | <b>816,3</b>   | <b>546,8</b>   | <b>1,363,1</b> | <b>810,1</b>   | <b>528,8</b>   | <b>1,338,9</b> |
| <b>Total</b>            | <b>1,411.3</b> | <b>1,021.8</b> | <b>2,433.2</b> | <b>1,397.8</b> | <b>1,013.9</b> | <b>2,411.8</b> |

| Age             | 2024           |                |                | 2025           |                |                |
|-----------------|----------------|----------------|----------------|----------------|----------------|----------------|
|                 | Female         | Male           | Total          | Female         | Male           | Total          |
| 1. < 30         | 154.6          | 131.0          | 285.6          | 149.8          | 124.0          | 273.8          |
| 2. >=30 and <50 | 787.5          | 671.8          | 1,550.3        | 826.6          | 640.5          | 1,467.1        |
| 3. >=50         | 378.3          | 219.1          | 597.3          | 421.5          | 249.4          | 670.9          |
| <b>Total</b>    | <b>1,411.3</b> | <b>1,021.8</b> | <b>2,433.2</b> | <b>1,397.8</b> | <b>1,013.9</b> | <b>2,411.8</b> |

| Professional Group      | 2024           |            |                | 2025           |             |                |
|-------------------------|----------------|------------|----------------|----------------|-------------|----------------|
|                         | Permanent      | Temporary  | Total          | Permanent      | Temporary   | Total          |
| 1. MANAGERS             | 75.6           | -          | 75.6           | 74.8           | 0.0         | 74.8           |
| 2. EXPERT PROFESSIONALS | 345.3          | 0.1        | 345.4          | 361.6          | 0.0         | 361.6          |
| 3. PROFESSIONALS        | 647.6          | 1.5        | 649.1          | 631.4          | 5.0         | 636.4          |
| <b>4. STAFF</b>         | <b>1,362.6</b> | <b>0.5</b> | <b>1,363.1</b> | <b>1,332.9</b> | <b>6.0</b>  | <b>1,338.9</b> |
| <b>Total</b>            | <b>2,431.1</b> | <b>2.1</b> | <b>2,433.2</b> | <b>2,400.8</b> | <b>11.0</b> | <b>2,411.8</b> |

| Age             | 2024           |            |                | 2025           |             |                |
|-----------------|----------------|------------|----------------|----------------|-------------|----------------|
|                 | Permanent      | Temporary  | Total          | Permanent      | Temporary   | Total          |
| 1. < 30         | 284.4          | 1.2        | 285.6          | 265.3          | 8.4         | 273.8          |
| 2. >=30 and <50 | 1,549.3        | 0.9        | 1,550.3        | 1,464.5        | 2.6         | 1,467.1        |
| 3. >=50         | 597.3          | -          | 597.3          | 670.9          | 0.0         | 670.9          |
| <b>Total</b>    | <b>2,431.1</b> | <b>2.1</b> | <b>2,433.2</b> | <b>2,400.8</b> | <b>11.0</b> | <b>2,411.8</b> |

| Professional Group      | 2024           |                |                | 2025           |                |                |
|-------------------------|----------------|----------------|----------------|----------------|----------------|----------------|
|                         | Full-time      | Part-time      | Total          | Full-time      | Part-time      | Total          |
| 1. MANAGERS             | 75.6           | -              | 75.6           | 74.8           | 0.0            | 74.8           |
| 2. EXPERT PROFESSIONALS | 322.8          | 22.7           | 345.4          | 336.6          | 25.0           | 361.6          |
| 3. PROFESSIONALS        | 550.1          | 99.0           | 649.1          | 535.2          | 101.3          | 636.4          |
| <b>4. STAFF</b>         | <b>374.4</b>   | <b>988.7</b>   | <b>1,363.1</b> | <b>374.1</b>   | <b>964.8</b>   | <b>1,338.9</b> |
| <b>Total</b>            | <b>1,322.8</b> | <b>1,110.3</b> | <b>2,433.2</b> | <b>1,320.7</b> | <b>1,091.1</b> | <b>2,411.8</b> |

| Age             | 2024           |                |                | 2025           |                |                |
|-----------------|----------------|----------------|----------------|----------------|----------------|----------------|
|                 | Full-time      | Part-time      | Total          | Full-time      | Part-time      | Total          |
| 1. < 30         | 69.4           | 216.2          | 285.6          | 88.7           | 185.1          | 273.8          |
| 2. >=30 and <50 | 817.8          | 732.4          | 1,550.3        | 741.4          | 725.7          | 1,467.1        |
| 3. >=50         | 435.6          | 161.8          | 597.3          | 490.6          | 180.3          | 670.9          |
| <b>Total</b>    | <b>1,322.8</b> | <b>1,110.3</b> | <b>2,433.2</b> | <b>1,320.7</b> | <b>1,091.1</b> | <b>2,411.8</b> |

#### 4. Number of dismissals by gender, age and professional category.

|        | 2024      |                      | 2025       |                      |
|--------|-----------|----------------------|------------|----------------------|
|        | Dismissal | Period-end headcount | Departures | Period-end headcount |
| Male   | 94        | 1,014                | 106        | 1,003                |
| Female | 107       | 1,409                | 105        | 1,384                |

|                         | 2024       |                      | 2025       |                      |
|-------------------------|------------|----------------------|------------|----------------------|
|                         | Dismissal  | Period-end headcount | Departures | Period-end headcount |
| 1. MANAGERS             | 2          | 79                   | 3          | 74                   |
| 2. EXPERT PROFESSIONALS | 7          | 348                  | 10         | 361                  |
| 3. PROFESSIONALS        | 34         | 646                  | 23         | 637                  |
| <b>4. STAFF</b>         | <b>158</b> | <b>1,350</b>         | <b>175</b> | <b>1,315</b>         |

|                 | Dismissal | Period-end headcount | Departures | Period-end head count |  |
|-----------------|-----------|----------------------|------------|-----------------------|--|
| 1. < 30         | 41        | 274                  | 54         | 274                   |  |
| 2. >=30 and <50 | 131       | 1,517                | 128        | 1,410                 |  |
| 3. >=50         | 29        | 632                  | 29         | 703                   |  |

**5. Average salaries and their progress broken down by gender, age and professional classification or equal value.**

|                                                         | 2024    |         |         | 2025    |         |         |
|---------------------------------------------------------|---------|---------|---------|---------|---------|---------|
|                                                         | Male    | Female  | Total   | Male    | Female  | Total   |
| <b>Total</b>                                            | 43,767  | 39,086  | 41,059  | 46,376  | 40,977  | 43,255  |
| <b>Average remuneration by age</b>                      |         |         |         |         |         |         |
| 1. < 30                                                 | 29,603  | 27,898  | 28,687  | 30,191  | 29,347  | 29,730  |
| 2. >=30 and <50                                         | 42,401  | 37,305  | 39,520  | 44,326  | 38,193  | 40,884  |
| 3. >=50                                                 | 56,285  | 47,640  | 50,819  | 59,592  | 50,478  | 53,873  |
| <b>Average total remuneration by professional group</b> |         |         |         |         |         |         |
| Managers                                                | 166,615 | 143,283 | 154,396 | 174,510 | 148,290 | 160,962 |
| Expert professionals                                    | 62,740  | 61,841  | 62,309  | 67,483  | 64,857  | 66,265  |
| Professionals                                           | 42,901  | 39,150  | 40,643  | 44,386  | 41,245  | 42,503  |
| Staff                                                   | 29,835  | 29,252  | 29,488  | 30,815  | 30,672  | 30,729  |

**6. Pay gap, remuneration of equal jobs or the average in society (following the methodology defined by Law 11/2018, for 2024 and 2025).**

|                                        | 2024 | 2025 |
|----------------------------------------|------|------|
| Pay gap calculated by type of position | 3.50 | 3.51 |

**7. Average remuneration of directors and executives, including variable remuneration, attendance fees, severance payments, payments to long-term savings schemes and any other compensation broken down by gender.**

**Director remuneration:**

| Average Remuneration         | 2024      |           |           | 2025      |           |           |
|------------------------------|-----------|-----------|-----------|-----------|-----------|-----------|
|                              | Male      | Female    | Total     | Male      | Female    | Total     |
| <b>Senior Management</b>     | 434.895,4 | 289,117.1 | 362,006.2 | 406,051.0 | 230,928.3 | 320,525.8 |
| *Steering Committee excl.CEO |           |           |           |           |           |           |

|                                    | 2024      |           |           | 2025      |           |           |
|------------------------------------|-----------|-----------|-----------|-----------|-----------|-----------|
|                                    | Male      | Female    | Total     | Male      | Female    | Total     |
| <b>Average Annual Remuneration</b> |           |           |           |           |           |           |
| <b>Non-Executive Director</b>      | 113,000.0 | 95,750.0  | 103,142.9 | 104,797.3 | 96,602.7  | 100,552.7 |
| <b>Executive Director</b>          |           | 506,423.0 | 506,423.0 |           | 687,336.2 | 687,336.2 |
| <b>Average</b>                     | 113,000.0 | 177,884.6 | 153,552.9 | 104,797.3 | 214,683.8 | 167,784.4 |

## 8. Number of employees with functional diversity.

At the end of fiscal year 2024, the Línea Directa Group had 37 employees with some type of disability, representing 1.6% of its workforce. Fiscal year 2025 closed with 43 employees with functional diversity, a 16% increase compared to the previous year.

## Organisation of work

### 9. Number of hours of absenteeism

|                                                     | 2024                    |                          | 2025                    |                          |
|-----------------------------------------------------|-------------------------|--------------------------|-------------------------|--------------------------|
|                                                     | Number of days of leave | Number of hours of leave | Number of days of leave | Number of hours of leave |
| <b>Total</b>                                        | 50,533                  | 292,432                  | 47,959                  | 278,067                  |
| <b>Common Illness</b>                               | 49,630                  | 288,442                  | 47,402                  | 274,597                  |
| Male                                                | 15,485                  | 91,776                   | 14,653                  | 89,117                   |
| Female                                              | 34,145                  | 196,666                  | 32,749                  | 185,480                  |
| <b>Total occupational accidents with sick leave</b> | 903                     | 3,990                    | 557                     | 3,470                    |
| Male                                                | 613                     | 2,852                    | 414                     | 2,694                    |
| Female                                              | 290                     | 1,138                    | 143                     | 776                      |

## Health and safety

### 10. Occupational accidents, in particular their frequency and seriousness; Occupational illnesses, broken down by gender.

|                            | 2024 |        |       | 2025 |        |       |
|----------------------------|------|--------|-------|------|--------|-------|
|                            | Male | Female | Total | Male | Female | Total |
| <b>Number of accidents</b> | 13   | 0      | 13    | 9    | 2      | 11    |

|                                       | 2024 |        |       | 2025 |        |       |
|---------------------------------------|------|--------|-------|------|--------|-------|
|                                       | Male | Female | Total | Male | Female | Total |
| <b>Occupational accidents</b>         |      |        |       |      |        |       |
| <b>Frequency rate</b>                 | 7.00 | 0.00   | 2.94  | 4.88 | 0.79   | 2.51  |
| <b>Gravity rate</b>                   | 0.12 | 0.00   | 0.05  | 0.13 | 0.01   | 0.06  |
| <b>Types of occupational diseases</b> | 0.00 | 0.00   | 0.00  | 0.00 | 0.00   | 0.00  |

## Social relationships

### 11. Percentage of employees covered by collective bargaining agreement.

|                                                    | 2024 | 2025 |
|----------------------------------------------------|------|------|
| People covered by collective bargaining agreements | 100% | 100% |

## Training

### 12. Total number of hours of training by professional category (average number of training hours)

| Professional group      | 2024             |                  |                  | 2025             |                  |                  |
|-------------------------|------------------|------------------|------------------|------------------|------------------|------------------|
|                         | Female           | Male             | Total            | Female           | Male             | Total            |
| 1. MANAGERS             | 1,091.41         | 1,277.93         | 2,369.34         | 1,818.20         | 1,915.20         | 3,733.40         |
| 2. EXPERT PROFESSIONALS | 5,065.58         | 5,917.22         | 10,982.80        | 6,560.00         | 7,798.10         | 14,358.10        |
| 3. PROFESSIONALS        | 8,699.85         | 5,679.11         | 14,378.96        | 8,881.80         | 5,536.60         | 14,418.40        |
| 4. STAFF                | 26,178.91        | 15,931.63        | 42,110.54        | 23,467.80        | 14,748.80        | 38,216.60        |
| <b>Total</b>            | <b>41,035.74</b> | <b>28,805.90</b> | <b>69,841.64</b> | <b>40,727.80</b> | <b>29,998.60</b> | <b>70,726.40</b> |

## Company

### 13. The impacts of the company's activity on employment and local development.

The Línea Directa Foundation was established in 2014 to combat road fatalities, drawing on the Group's extensive experience and expertise in the field of accidents. Operating under the motto "For Road Safety. Here and Now," the Foundation has four lines of action: Research, Outreach, Social Action, and Training, through which it promotes and develops impactful initiatives in the fight against road deaths.

#### Research.

In 2025, the Línea Directa Foundation prepared and published three Road Safety Studies as established in the 2025 Action Plan:

- **Accident rates, injuries, and perceptions among Spanish motorcyclists.** Conducted in collaboration with Centro Zaragoza, this study analyzed 30-day accident data from the ARENA database for accidents occurring between 2014 and 2023, as well as traffic violations reported to the DGT (Spanish Directorate General of Traffic) for motorcycles and mopeds between 2014 and 2023. It also examined the number of motorcycles and mopeds on the road, the number of DGT licenses issued, and the percentage of positive results for prohibited substances from the National Institute of Toxicology and Forensic

Sciences. In addition, a survey of 1,700 motorcyclists over the age of 18 was conducted to gather their opinions and habits on this topic.

- **Walking Safely: Accidents and Risks for Pedestrians in Spain (2014-2023).** Conducted in collaboration with FESVIAL, this study analyzed 30-day accident data from the ARENA database for the years 2014 to 2023, the percentage of positive drug, alcohol, and psychotropic medication tests from the National Institute of Toxicology and Forensic Sciences, and the number of pedestrian fatalities in cities and on 30-kilometer stretches of interurban roads. In addition, a survey of 1,700 pedestrians over the age of 18 was conducted to gather their opinions and habits on this issue.
- **Caution, bad weather. Influence of adverse weather on traffic accidents (2014-2023).** This study focused on the accident rate and risks associated with driving in adverse weather, which was present in more than 148,000 accidents over the last 10 years, resulting in almost 20,000 victims, more than 1,800 deaths, and nearly 190,000 injuries. The report was supplemented by a survey analyzing drivers' behavior and perceptions in these types of events.

## Outreach.

Through its Outreach program, the Línea Directa Foundation organized another edition of the Road Safety Journalism Award, which recognizes the best reports and articles on road safety published in Spanish media. The 22nd edition was held in 2025, with the following jury:

- **Pere Navarro**, Director General of Transport. Chairman of the Jury.
- **Mirenchu del Valle**, President of UNESPA (Spanish Union of Insurance and Reinsurance Entities).
- **Pere Macias**, Chairman of the Commission for Road Safety of the Chamber of Deputies during the 2011-2015 legislature.
- **Pedro Guerrero**, former President of Bankinter and Trustee of the Bankinter Foundation of Innovation.
- **María Dolores Dancausa**, President of Bankinter
- **Alicia Calvo**, journalist for the newspaper EL MUNDO CASTILLA y LEÓN and winner of the XXI edition of the Road Safety Journalism Award in the category of print media and online media
- **Lourdes Maldonado**, journalist and presenter for RNE.
- **Ángel Carreira**, Journalist and Political Correspondent for ANTENA 3 News.
- **Leticia Iglesias**, Journalist and presenter for TELECINCO.

The winners of the 22nd edition of the Road Safety Journalism Award were the team from the DGT's Traffic and Road Safety magazine in the Written Press and Online Media category; Isabel Salvador, from Cadena SER, in the Radio category; and Beatriz Correal from La Sexta, in the Television category.

The Solidarity Award was given to the Motorcyclists' Platform for Road Safety in recognition of its two decades of commitment to the protection and safety of motorcyclists. Meanwhile, the **Military Emergency Unit (UME)** received the Honorary Road Safety Award for its outstanding operational work and its constant commitment to road safety and the protection of citizens in emergency situations, with special mention of its work in the recovery and clearing of roads after the recent DANA storm that devastated the Valencian Community.

### **Training and Social Action.**

The Línea Directa Foundation develops various initiatives through its Training and Social Action programs with the aim of promoting knowledge about road safety and actively contributing to the creation of a fairer and more cohesive society. Therefore, in 2025, it held its 11th edition of the Entrepreneurs and Road Safety Award and launched a series of presentations by traffic victim associations for Group employees. The Entrepreneurs Award aims to promote entrepreneurship in the field of road safety and mobility, always with the goal of reducing road fatalities. To this end, it awards the winner € 20,000 with no additional funding or co-investment required. In a subsequent phase, the leaders of the selected project will be able to access funding rounds from the Bankinter Innovation Foundation and IESE Business School.

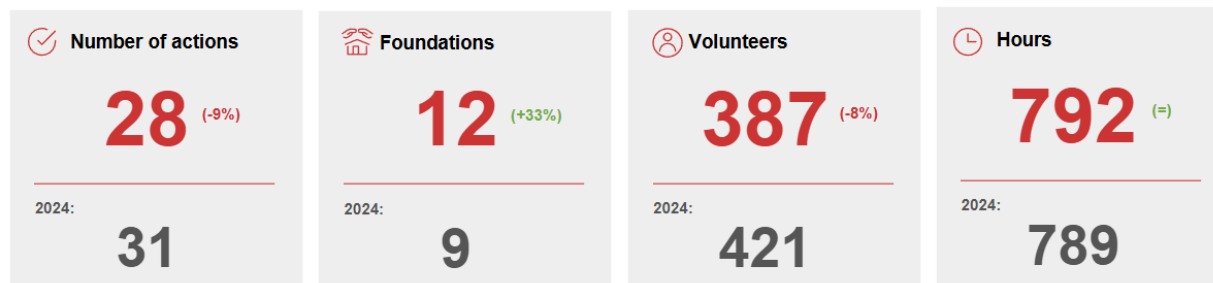
In the 2025 edition, LiveLink Ventures was the winner, out of 63 candidates, thanks to KOMOBI, an eCall device for motorcycles that detects any accident in a matter of seconds, automatically alerting emergency services and sending the exact location of the injured person, in order to reduce the response time of the health services and increase the quality of care received by the injured.

Furthermore, in 2025 the Foundation carried out several social action initiatives focused on raising awareness about the risks of drinking and driving, including two roundtables with the participation of key Stakeholders in the fight against traffic accidents, such as the Civil Guard, the Spanish Foundation for Road Safety, the traffic accident victims' association AESLEME, and leading figures in journalism. These actions were complemented by various games and contests on social media and the creation and distribution of a press release with key data on accidents involving alcohol.

#### **14. The impacts of the company's activities on local populations and the region.**

#### **15. The relationships with the main players in local communities and the types of dialogue established with them.**

Regarding points 14 and 15, since 2022, the Group's social action has been effectively integrated into its sustainability strategy under the name '**Línea Directa Movement**'. This name aims to highlight and encompass social action, as well as frame corporate volunteering. It also seeks to issue a call to action with the goal of involving more people in the community. The **volunteering network** aims to include social action and sustainability programs that address all the charitable concerns of the Group's employees.



In accordance with the 2025 Social Action Plan, the Group has reduced the total number of actions, to favor those with high impacts (the high impacts actions carried out in 2025 have been Bingo with grandparents, AECC Race, In run Race, Intratech Direct Line, escuela de fortalecimiento and mentoring school in Línea Directa and children's science camp, Fun Science).

The types of volunteering offered, as well as their occasional hosting at the Group's facilities, have led to a notable increase in volunteers, especially one-day volunteers (not registered in the network).

The diversity of groups with whom we have worked (disability, the elderly, social exclusion) has fostered an increase in volunteers, especially in actions that have allowed us to work hand in hand with them.

Another key aspect has been channeling motivational actions towards solidarity spaces: Off-site activities, area meetings, etc.

The breakdown of the main actions by group is presented below:

| Children                                                                                                                                                                              | Disability                                                                                                                                                                                                                                                                                                                                                                                                       | Social Exclusion                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"> <li>CARRERA DE LA INFANCIA CRUZ ROJA</li> <li>JORNADA DE PUERTAS ABIERTAS NORTE JOVEN</li> <li>CAMPAMENTO CIENTIFICO JUNIOR ACHIEVEMENT</li> </ul> | <ul style="list-style-type: none"> <li>INRUN</li> <li>MERCADILLO SOLIDARIO A LA PAR</li> <li>TALLER SEGURIDAD EN EL HOGAR</li> <li>TEAMBUILDING JORNADA LÍNEA DIRECTA AL TALENTO</li> <li>TEAMBUILDING JORNADA LÍNEA DIRECTA AL TALENTO</li> <li>DONACIÓN MATERIAL DE COCINA A APROCOR</li> <li>RECICLIBROS</li> <li>REGALOS DE CUMPLEAÑOS JUAN XXIII</li> <li>CAMPAÑA DE SENSIBILIZACIÓN SIN LÍMITES</li> </ul> | <ul style="list-style-type: none"> <li>8M JORNADA DE PUERTAS ABIERTAS</li> <li>INTEGRA TE (INSTALACIONES LÍNEA DIRECTA)</li> <li>ESCUELA DE FORTALECIMIENTO (INSTALACIONES LÍNEA DIRECTA)</li> <li>MENTORING ESCUELA DE FORTALECIMIENTO</li> <li>CESTAS SOLIDARIAS</li> <li>INTEGRATECH: Aplicando a Ofertas de Trabajo</li> <li>APLICANDO A OFERTAS DE TRABAJO (ESCUELA DE FORTALECIMIENTO)</li> <li>LEADERSHIP FOR A JOB</li> <li>APPLICANDO A OFERTAS DE TRABAJO (INTEGRATECH)</li> <li>DOSSIER BUENAS PRÁCTICAS EN DINÁMICAS GRUPALES</li> </ul> |
| Senior citizen                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <ul style="list-style-type: none"> <li>BINGO CON ABUELOS</li> </ul>                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

Below is a breakdown of actions for each of the entities with which it carries out these social actions:



| Action            | Date       | Volunteers | Total hours |
|-------------------|------------|------------|-------------|
| BINGO CON ABUELOS | 21/05/2025 | 40         | 140         |



| Action                        | Date       | Volunteers | Total hours |
|-------------------------------|------------|------------|-------------|
| INRUN                         | 01/06/2025 | 31         | 47          |
| MERCADILLO SOLIDARIO A LA PAR | 05/02/2025 | 6          | 18          |
| TALLER SEGURIDAD EN EL HOGAR  | 02/04/2025 | 4          | 8           |



| Action                                                      | Date       | Volunteers | Total hours |
|-------------------------------------------------------------|------------|------------|-------------|
| JORNADA DE SENSIBILIZACIÓN 25N                              | 27/12/2025 | 85         | 170         |
| 8M JORNADA DE PUERTAS ABIERTAS                              | 05/03/2025 | 13         | 32,5        |
| INTEGRA TE (INSTALACIONES LÍNEA DIRECTA)                    | 06/10/2025 | 13         | 32,5        |
| ESCUELA DE FORTALECIMIENTO (INSTALACIONES LÍNEA DIRECTA)    | 23/06/2025 | 12         | 36          |
| MENTORING ESCUELA DE FORTALECIMIENTO                        | 23/06/2025 | 8          | 16          |
| INTEGRATECH: Aplicando a Ofertas de Trabajo                 | 11/02/2025 | 2          | 4           |
| APLICANDO A OFERTAS DE TRABAJO (ESCUELA DE FORTALECIMIENTO) | 11/02/2025 | 2          | 5           |
| LEADERSHIP FOR A JOB                                        | 09/10/2025 | 2          | 4           |
| APLICANDO A OFERTAS DE TRABAJO (INTEGRATECH)                | 25/03/2025 | 1          | 1           |
| DOSSIER BUENAS PRÁCTICAS EN DINÁMICAS GRUPALES              | 18/08/2025 | 1          | 3           |



| Action             | Date       | Volunteers | Total hours |
|--------------------|------------|------------|-------------|
| JUNIOR ACHIEVEMENT | 30/05/2025 | 2          | 6           |



| Action                                  | Date       | Volunteers | Total hours |
|-----------------------------------------|------------|------------|-------------|
| JORNADA DE PUERTAS ABIERTAS NORTE JOVEN | 23/04/2025 | 4          | 12          |



| Action                                        | Date       | Volunteers | Total hours |
|-----------------------------------------------|------------|------------|-------------|
| TEAMBUILDING JORNADA LÍNEA DIRECTA AL TALENTO | 25/02/2025 | 3          | 6           |
| TEAMBUILDING JORNADA LÍNEA DIRECTA AL TALENTO | 25/09/2025 | 3          | 4,5         |

## 16. Partnership or sponsorship actions.

The Línea Directa Group actively participates with sectoral entities in the insurance industry, such as **ICEA**, which focuses on research, statistical studies, training, and consulting applied to the insurance sector, and **UNESPA**, the association that represents the insurance sector to society. Internationally, in early 2023, Línea Directa joined the **United Nations Principles for Sustainable Insurance (PSI)** initiative, which provides a global action plan to develop and scale up the innovative insurance and risk management solutions needed to promote renewable energy, clean water, food security, sustainable cities, and disaster-resilient communities.

The amount allocated by the Group to support these sector initiatives amounted to € 150,146.35 in 2025, while in 2024 it amounted to € 134,433.88.

## Consumers

### 17. Measures for the health and safety of consumers.

This section is developed in chapter S4-4 of this Sustainability Report, on the adoption of measures related to material impacts on consumers and end users, approaches to mitigate material risks and take advantage of material opportunities related to consumers and end users, and the effectiveness of such actions.

## Corruption and bribery

### 18. Measures to combat money laundering.

The Línea Directa Group is not an obligated entity in matters of Prevention of Money Laundering and Financing of Terrorism, as established by Article 2 of Law 10/2010 of April 29, since it operates in the Non-Life branch, so it is not appropriate to detail the aspects outlined in this non-financial Annex.

### 19. Contributions to foundations and non-profit entities.

As a demonstration of its commitment to society, the Línea Directa Group has contributed € 545,354 to foundations and non-profit organisations, primarily for community investments and, to a lesser extent, for charitable donations and commercial initiatives. This amount rose to € 621,796 in 2024.

Furthermore, Línea Directa promotes the social commitment of its employees by supporting activities carried out through corporate volunteering in collaboration with various foundations, associations and NGOs described in sections 14 and 15 of this Annex.

## Tax information

### 20. Earnings obtained by country.

| Country  | Company                                     | Primary activity                                     | Number of employees |       | Net turnover by country |           | Profit/(loss) before tax |         | Corporate income tax payable |         | Corporate income tax paid |        |
|----------|---------------------------------------------|------------------------------------------------------|---------------------|-------|-------------------------|-----------|--------------------------|---------|------------------------------|---------|---------------------------|--------|
|          |                                             |                                                      | 2024                | 2025  | 2024                    | 2025      | 2024                     | 2025    | 2024                         | 2025    | 2024                      | 2025   |
| Spain    | Línea Directa Aseguradora S.A               | Insurance agents and brokers                         |                     |       |                         |           |                          |         |                              |         |                           |        |
|          | Línea Directa Asistencia S.L.U              | Activities related to transport by land              |                     |       |                         |           |                          |         |                              |         |                           |        |
|          | Centro Avanzado de Reparaciones (CAR) S.L.U | Motor vehicle maintenance & repair                   | 2,423               | 2,387 | 991,255                 | 1,076,636 | 83,311                   | 114,140 | -19,094                      | -28,425 | 11,792                    | 24,902 |
|          | Moto Club LDA, S.L.U.                       | Other associated activities                          |                     |       |                         |           |                          |         |                              |         |                           |        |
|          | Ambar Medline, S.L.U                        | Not included elsewhere Insurance agents and brokers. |                     |       |                         |           |                          |         |                              |         |                           |        |
|          | LDA Activos S.L.U                           | Renting of property for own account                  |                     |       |                         |           |                          |         |                              |         |                           |        |
| Portugal | Línea Directa Aseguradora S.A               | Insurance agents and brokers                         |                     |       | 74                      | 69        | 39                       | 30      |                              |         |                           |        |
| Total    |                                             |                                                      | 2,423               | 2,387 | 991,329                 | 1,076,705 | 83,350                   | 114,170 | -19,094                      | -28,425 | 11,792                    | 24,902 |

In November 2024, the subsidiary Moto Club LDA, S.L.U. ceased its activity, which has no effect on this report.

### 21. Public subsidies received.

The Línea Directa Group has not received any subsidies or public aid during the year 2025. During the year 2024 it also did not receive any subsidies or public aid.

## Pollution

### 22. Measures to prevent, reduce or repair any form of activity-specific air pollution, including noise and light pollution.

As a result of the Double Materiality process carried out in 2024 and updated through consultation with the Sustainability Working Group in 2025, it has been determined that, due to the nature of its activity, the contents of Law 11/2018 relating to **noise and light pollution** are not considered **material** given the particularities of the industry and the activity of the Group.

## Circular economy and waste prevention and management

In the double materiality exercise carried out for the preparation of this report, the generation of waste has **not** been identified as a **material**.

### 23. Circular economy.

### 24. Waste: prevention measures, recycling, reuse and other forms of recovery and elimination of waste.

To manage the **waste generated** on the premises, there are waste collection centers in each plant, office and company, properly signposted so that all staff can segregate organic waste, paper waste and packaging.

All waste resulting from business activity is managed by **authorised waste managers**, with the aim of carrying out final waste **recovery** treatments so that the resources used have a second life.

### Circular economy.

In recent years, the Línea Directa Group has developed initiatives that promote the circular economy, which is one of the main global challenges. This plan is based on two fundamental pillars:

- The project, launched in 2016, aims to reduce paper consumption by implementing digital procedures. Customers can access all documentation digitally with the "**Digital Policy**", which is sent to the insured upon purchase. Other measures that have helped raise employee awareness about paper conservation include the expanded use of electronic signatures, both in customer communications and in contracts with suppliers and employees. This allows each contract to have a single digital file, thus reducing paper requirements.
- Reduction of waste generation and increased reuse, recycling, or other forms of recovery of the waste produced. In particular, CAR Madrid has obtained the "**Zero Waste**" certificate, which confirms that in the last fiscal year, 95.44% of the waste generated by the workshop was treated for recovery (around 5 percentage points more than in 2024); and CAR Barcelona the "**Towards Zero Waste**" certificate, which indicates that 74.44% of the waste produced in the last fiscal year as a result of production activity has undergone recovery treatments (around 14 percentage points more than in 2024).

These two lines of action, together with the technological changes implemented, have helped to gradually develop a cultural change within the Group, which directly impacts environmental performance in general, and waste management in particular.

In the case of the CAR Madrid and CAR Barcelona workshops, the subsidiaries follow a rigorous waste management system, due to the activity they carry out and the type of materials they work with.

## 25. Actions to combat food waste.

Due to the particularities of the industry and the activity of the Linea Directa group, food waste is not considered a material topic.

## Sustainable use of resources

### 26. The consumption of water and the supply of water in accordance with local restrictions.

In the double materiality exercise carried out for the preparation of this report, water consumption has not been identified as a material.

### 27. Consumption of materials and the measures taken to improve the efficiency in their use.

Línea Directa Aseguradora has implemented an environmental management system, certified according to the UNE-EN ISO 14001:2015 standard, to centrally monitor and manage energy consumption, water consumption, waste production, and other aspects of environmental performance at its workplaces, which are occupied by 100% of its employees. It also has an **energy management system** certified according to the international standard UNE-EN ISO 50001:2018, which guarantees a reduced environmental impacts through lower energy consumption. Both certifications are renewed annually, allowing for the yearly identification of new legal requirements and risks related to these management systems. Furthermore, these management systems enable the planning and implementation of measures and strategies for the more effective control and management of all resources, with the ultimate goal of minimizing environmental impacts and reducing the costs associated with the Group's activities.

The Sustainability Plan for 2025 initially included, as an action, the preparation of the **subsidiaries Linea Directa Asistencia, CAR Madrid, and CAR Barcelona** for future inclusion in the **ISO 14001:2015 and ISO 50001:2018** certifications. After conducting a feasibility study of implementing both certifications in the subsidiaries, assessing their impacts, resources, and costs and benefits, Management decided not to proceed with these certifications for these companies in the coming years, given the low consumption by Línea Directa Asistencia in its offices and the good environmental and waste management already certified by other seals with respect to the Centro Avanzado de Reparaciones (CAR).

In the Double Materiality exercise carried out for the preparation of this report, the consumption of **raw material** (paper and toner) has not been identified as a material.

### 28. Direct and indirect consumption of energy, measures taken to improve energy efficiency and the use of renewable energy.

The Línea Directa Group has improved its energy performance, reducing total energy consumption in fiscal year 2025. The energy consumption table compared to 2024 is reported below.

| Energy Consumption                           | 2024           | 2025           |
|----------------------------------------------|----------------|----------------|
| Diesel (l)                                   | 7,706.9        | 17,861.8       |
| Diesel (MWh)                                 | 76.9           | 178.3          |
| Natural Gas (MWh)                            | 2,316.0        | 2,338.5        |
| Electricity (MWh)                            | 4,683.2        | 4,138.6        |
| Self-generated electricity (MWh)             | 751.8          | 606.3          |
| % Electricity from renewable sources         | 72.2%          | 70.7%          |
| Electricity from renewable sources (MWh)     | 3,433.8        | 2,927.5        |
| Electricity from non-renewable sources (MWh) | 1,249.4        | 1,211.1        |
| <b>Total Power Consumed</b>                  | <b>7,076.1</b> | <b>6,655.3</b> |

For further information, you can consult the chapter of the report on **Climate Change (ESRS E1)** in section **E1-5 Energy Consumption and Mix** according to the European CSRD directive.

## Biodiversity protection

### 29. Measures taken to preserve or restore biodiversity.

Biodiversity is not a material topic for Línea Directa Group, as it is located in urban areas does not have an impact on protected natural areas and/or biodiversity.

### 30. Impacts caused by activities or operations in protected areas.

Línea Directa has proceeded to analyze the recommendations for the disclosure of risks and opportunities related to nature, and in this sense has not currently identified aspects that may have an impact, either positive or negative, and that are relevant in the short or medium term for the Group. Línea Directa not an insurer whose lines of business include insurance for activities that could negatively impacts biodiversity or any animal species.

However, in future reporting periods, the Group will assess the appropriateness of conducting such an evaluation, particularly given its role as an institutional investor.

To obtain a comprehensive assessment, it is expected that the companies in which the Group holds shares will publish their corresponding biodiversity risk and opportunity analyses in their upcoming reporting periods.

Additionally, the heterogeneity of its current value chain makes it difficult to obtain complete information related to environmental impacts and, consequently, to conduct a comprehensive assessment of the associated risks and opportunities. Its operations combine responsible consumption management with the launch of new products for less polluting forms of mobility.

Furthermore, the Group continues to make progress in the responsible management of its value chain and in the integration of ESG criteria into its investment portfolio. Moreover, as a demonstration of its commitment to nature and the environment, the Línea Directa Group supports the WWF's "Earth Hour" initiative, which aims to mobilize individuals, businesses, and governments to reverse biodiversity loss. Specifically, the Group actively collaborates with the actions promoted by this initiative and makes an annual contribution.

## Emissions

### 31. Scope 1 and 2 emissions.

|                                                                  | 2024    | 2025  | % Diff  |
|------------------------------------------------------------------|---------|-------|---------|
| <b>Scope 1 GHG emissions</b>                                     |         |       |         |
| Gross Scope 1 GHG emissions (tCO <sub>2</sub> eq)                | 527.1   | 474.5 | (10.0)% |
| <b>Scope 2 GHG emissions</b>                                     |         |       |         |
| Gross location-based Scope 2 GHG emissions (tCO <sub>2</sub> eq) | 1,007.5 | 384.6 | (61.8)% |
| Market-based gross Scope 2 GHG emissions (tCO <sub>2</sub> eq)   | 310.2   | 359.5 | 15.9%   |

The Group's Scope 1 emissions decreased by 10% in 2025 due to the containment of natural gas consumption, optimization in diesel purchases, and good maintenance of air conditioning equipment, which has not registered any leaks of fluorinated gases.

In Scope 2, the Group has increased its emissions by 15.9% compared to 2024 due to consumption produced, from July onwards, in one of its investment properties, in order to carry out a renovation to optimize its energy efficiency.

## Annex II. List of data points included in cross-cutting and thematic standards derived from other EU legislation

| Disclosure regulations and related data point                                                                                | Reference to the Regulation on the disclosure of information relating to sustainability in the financial services sector 23 | Pillar reference 324                                                                                                                                                                                          | Reference to the Regulation on benchmark indexes 25                                                           | Reference of European Climate Legislation 26 | Report page    |
|------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|----------------------------------------------|----------------|
| ESRS 2 GOV-1<br>Gender diversity of the board of directors<br>Section 21, letter d)                                          | Indicator No. 13 of Table 1 of Annex 1                                                                                      |                                                                                                                                                                                                               | Commission Delegated Regulation (EU) 2020/1816, Annex II                                                      |                                              | 155            |
| ESRS 2 GOV-1<br>Percentage of council members who are independent, paragraph 21 e)                                           |                                                                                                                             |                                                                                                                                                                                                               | Delegated Regulation (EU) 2020/1816, Annex II                                                                 |                                              | 155            |
| ESRS 2 GOV-4<br>Due Diligence Statement<br>Section 30                                                                        | Indicator No. 10 of Table 3 of Annex 1                                                                                      |                                                                                                                                                                                                               |                                                                                                               |                                              | 165            |
| ESRS 2 SBM-1<br>Participation in activities related to fuels fossils<br>section 40, letter d), subsection i)                 | Indicator No. 4 of Table 1 of Annex 1                                                                                       | Article 449a of Regulation (EU) No 575/2013;<br>Commission Implementing Regulation (EU) 2022/2453, Table 1: Qualitative information on environmental risk and Table 2: Qualitative information on social risk | Delegated Regulation (EU) 2020/1816, Annex II                                                                 |                                              | Not applicable |
| ESRS 2 SBM-1<br>Participation in activities related to production of chemical substances<br>section 40, letter d), point ii) | Indicator No. 9 of Table 2 of Annex 1                                                                                       |                                                                                                                                                                                                               | Delegated Regulation (EU) 2020/1816, Annex II                                                                 |                                              | Not applicable |
| ESRS 2 SBM-1<br>Participation in weapons-related activities controversial<br>section 40, letter d), section iii)             | Indicator No. 14 of Table 1 of Annex 1                                                                                      |                                                                                                                                                                                                               | Delegated Regulation (EU) 2020/181829, Article 12, paragraph 1; Delegated Regulation (EU) 2020/1816, Annex II |                                              | Not applicable |

|                                                                                                                                                   |                                                                      |  |                                                                                                                                                                                                                                                     |                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------|--|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| ESRS 2 SBM-1<br>Participation in activities related to cultivation and the production of tobacco section 40, letter d), subsection iv)            |                                                                      |  | Delegated Regulation (EU) 2020/1818, Article 12, paragraph 1; Delegated Regulation (EU) 2020/1816, Annex II                                                                                                                                         | Not applicable                                                                                    |
| ESRS E1-1<br>Transition plan to achieve climate neutrality by 2050 section 14                                                                     |                                                                      |  |                                                                                                                                                                                                                                                     | Regulation (EU) 2021/1119, Article 2, paragraph 1<br>237                                          |
| ESRS E1-1<br>Excluded companies of the harmonised benchmark indexes with the Paris Agreement section 16, letter g)                                |                                                                      |  | Article 449, letter a), of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Bank portfolio – Climate change-linked transition risk: Credit quality of exposures by sector, issues and remaining maturity | Delegated Regulation (EU) 2020/1818, Article 12(1)(d) to (g), and Article 12(2)<br>Not applicable |
| ESRS E1-4<br>Reduction targets GHG emissions section 34                                                                                           | Indicator No. 4 of Table 2 of Annex 1                                |  | Article 449, letter a), of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, template 3: Bank portfolio – Transition risk linked to climate change: harmonisation parameters                                          | Delegated Regulation (EU) 2020/1818, Article 6<br>243                                             |
| ESRS E1-5<br>Energy consumption from fossil, non-renewable sources, disaggregated by sources (sectors only) with high climate impacts) section 38 | Indicator No. 5 in Table 1 and Indicator No. 5 in Table 2 of Annex 1 |  |                                                                                                                                                                                                                                                     | Not applicable                                                                                    |
| ESRS E1-5 Consumption and energy combination section 37                                                                                           | Indicator No. 5 of Table 1 of Annex 1                                |  |                                                                                                                                                                                                                                                     | 246                                                                                               |
| ESRS E1-5<br>Energy intensity related to activities in sectors with high climate impacts sections 40 to 43                                        | Indicator No. 6 of Table 1 of Annex 1                                |  |                                                                                                                                                                                                                                                     | Not applicable                                                                                    |

|                                                                                                                                                                                                                                   |                                                  |                                                                                                                                                                                                                                                                                               |                                                                                                      |                |
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| ESRS E1-6<br>Gross scope 1, 2 and 3<br>GHG emissions<br>and GHG emissions<br>totals<br>section 44                                                                                                                                 | Indicators Nos. 1 and 2 of<br>Table 1 of Annex 1 | Article 449a; Regulation (EU) No 575/2013;<br>Commission Implementing Regulation (EU)<br>2022/2453, template 1: Bank portfolio –<br>Climate change-linked transition risk: credit<br>quality of exposures by sector, issues and<br>remaining maturity                                         | Delegated Regulation (EU)<br>2020/1818, Article 5(1) and<br>Articles 6 and 8(1)                      | 248            |
| ESRS E1-6<br>Gross emissions intensity<br>of GHG<br>sections 53 to 55                                                                                                                                                             | Indicator No. 3 of the chart<br>1 of Annex 1     | Article 449a of Regulation (EU) No<br>575/2013; Commission Implementing<br>Regulation (EU) 2022/2453, template 3:<br>Bank portfolio – Transition risk linked to<br>climate change: harmonisation parameters                                                                                   | Delegated Regulation (EU)<br>2020/1818, Article 8,<br>paragraph 1                                    | 251            |
| ESRS E1-7<br>GHG absorptions and<br>carbon credits<br>section 56                                                                                                                                                                  |                                                  |                                                                                                                                                                                                                                                                                               | Regulation (EU) 2021/1119,<br>Article 2, paragraph 1                                                 | 252            |
| ESRS E1-9<br>Exhibition of the<br>benchmark index portfolio<br>related physical risks<br>with the weather<br>section 66                                                                                                           |                                                  |                                                                                                                                                                                                                                                                                               | Delegated Regulation (EU)<br>2020/1818, Annex II<br>Delegated Regulation (EU)<br>2020/1816, Annex II | 254            |
| ESRS E1-9<br>Breakdown of monetary<br>amounts for acute and<br>chronic physical risks<br>section 66, letter a)<br>ESRS E1-9<br>Location of assets<br>important exposed to<br>significant physical risks<br>section 66, letter c). |                                                  | Article 449a of Regulation (EU) No<br>575/2013; Commission Implementing<br>Regulation (EU) 2022/2453, paragraphs 46<br>and 47; Template 5. Bank portfolio.<br>Physical risk linked to climate change:<br>exposures subject to physical risk.                                                  |                                                                                                      | Not applicable |
| ESRS E1-9 Breakdown<br>of the book value of<br>their real estate assets for<br>energy efficiency<br>energy<br>section 67, letter c).                                                                                              |                                                  | Article 449a of Regulation (EU) No<br>575/2013; Commission Implementing<br>Regulation (EU) 2022/2453, paragraph 34;<br>template 2:Bank portfolio - Transition risk<br>linked to climate change: loans secured by<br>collateral consisting of real estate —<br>Energy efficiency of collateral |                                                                                                      | Not applicable |

|                                                                                                                                                                                                |                                                                                                                                                            |                                               |                |
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| ESRS E1-9<br>Degree of exposure of the portfolio to opportunities climate-related section 69                                                                                                   |                                                                                                                                                            | Delegated Regulation (EU) 2020/1818, Annex II | Not applicable |
| ESRS E2-4<br>Quantity of each pollutant listed in Annex II of the European PRTR Regulation (European Pollutant Release and Transfer Register) emitted into the air, water and soil, section 28 | Indicator No. 8 of Table 1 of Annex 1, Indicator No. 2 of Table 2 of Annex 1, Indicator No. 1 of Table 2 of Annex 1, Indicator No. 3 of Table 2 of Annex 1 |                                               | Not applicable |
| ESRS E3-1<br>Water and marine resources section 9                                                                                                                                              | Indicator No. 7 of Table 2 of Annex 1                                                                                                                      |                                               | Not applicable |
| ESRS E3-1<br>Specific policies section 13                                                                                                                                                      | Indicator No. 8 of Table 2 of Annex 1                                                                                                                      |                                               | Not applicable |
| ESRS E3-1<br>Sustainable management of oceans and seas section 14                                                                                                                              | Indicator No. 12 of Table 2 of Annex 1                                                                                                                     |                                               | Not applicable |
| ESRS E3-4<br>Total recycled and reused water, section 28, letter c)                                                                                                                            | Indicator No. 6.2 of Table 2 of Annex 1                                                                                                                    |                                               | Not applicable |
| ESRS E3-4<br>Total water consumption in m3 per net income from own operations section 29                                                                                                       | Indicator No. 6.1 of Table 2 of Annex 1                                                                                                                    |                                               | Not applicable |
| ESRS 2 - IRO 1 - E4 section 16, letter a), subsection i)                                                                                                                                       | Indicator No. 7 of Table 1 of Annex 1                                                                                                                      |                                               | Not applicable |
| ESRS 2 - IRO 1 - E4 section 16, letter b)                                                                                                                                                      | Indicator No. 10 of Table 2 of Annex 1                                                                                                                     |                                               | Not applicable |
| ESRS 2 - IRO 1 - E4 section 16, letter c)                                                                                                                                                      | Indicator No. 14 of Table 2 of Annex 1                                                                                                                     |                                               | Not applicable |

|                                                                                                                                                        |                                                                       |                                               |                |
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| ESRS E4-2<br>Sustainable agricultural or land use practices or policies section 24, letter b)                                                          | Indicator No. 11 of Table 2 of Annex 1                                |                                               | Not applicable |
| ESRS E4-2<br>Sustainable marine or ocean practices or policies section 24, letter c)                                                                   | Indicator No. 12 of Table 2 of Annex 1                                |                                               | Not applicable |
| ESRS E4-2<br>Policies to address deforestation section 24, letter d)                                                                                   | Indicator No. 15 of Table 2 of Annex 1                                |                                               | Not applicable |
| ESRS E5-5<br>Non-recycled waste section 37, letter d)                                                                                                  | Indicator No. 13 of Table 2 of Annex 1                                |                                               | Not applicable |
| ESRS E5-5<br>Hazardous waste and radioactive waste section 39                                                                                          | Indicator No. 9 of Table 1 of Annex 1                                 |                                               | Not applicable |
| ESRS 2 - SBM3 - S1<br>Risk of forced labor cases, section 14, letter f)                                                                                | Indicator No. 13 of Table 3 of Annex I                                |                                               | Not applicable |
| ESRS 2 - SBM3 - S1<br>Risk of child labor cases section 14, letter g)                                                                                  | Indicator No. 12 of Table 3 of Annex I                                |                                               | Not applicable |
| ESRS S1-1<br>Political commitments on Human Rights, section 20                                                                                         | Indicator No. 9 in Table 3 and Indicator No. 11 in Table 1 of Annex I |                                               | 269            |
| ESRS S1-1<br>Due diligence policies regarding the issues covered by Fundamental Conventions 1 to 8 of the International Labour organisation section 21 |                                                                       | Delegated Regulation (EU) 2020/1816, Annex II | 269            |
| ESRS S1-1<br>Processes and measures for the prevention of human trafficking section 22                                                                 | Indicator No. 11 of Table 3 of Annex I                                |                                               | Not applicable |

|                                                                                                                                                   |                                                                        |                                                                                                             |                |
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| ESRS S1-1<br>Prevention policies or accident management system in the workplace section 23                                                        | Indicator No. 1 of Table 3 of Annex I                                  |                                                                                                             | 269            |
| ESRS S1-3<br>Mechanisms for managing claims or complaints, section 32, letter c)                                                                  | Indicator No. 5 of Table 3 of Annex I                                  |                                                                                                             | 284            |
| ESRS S1-14<br>Number of fatalities and number and rate of work accidents section 88, letters b) and c)                                            | Indicator No. 2 of Table 3 of Annex I                                  | Delegated Regulation (EU) 2020/1816, Annex II                                                               | Not applicable |
| ESRS S1-14<br>Number of days lost due to injury, accident, death, or illness section 88, letter e)                                                | Indicator No. 3 of Table 3 of Annex I                                  |                                                                                                             | Not applicable |
| ESRS S1-16<br>Gender pay gap, unadjusted section 97, letter a)                                                                                    | Indicator No. 12 of Table 1 of Annex I                                 | Delegated Regulation (EU) 2020/1816, Annex II                                                               | 307            |
| ESRS S1-16<br>Excessive pay gap between the CEO and employees section 97, letter b)                                                               | Indicator No. 8 of Table 3 of Annex I                                  |                                                                                                             | 307            |
| ESRS S1-17<br>Cases of discrimination, section 103, letter a)                                                                                     | Indicator No. 7 of Table 3 of Annex I                                  |                                                                                                             | 308            |
| ESRS S1-17. Non-compliance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines section 104, letter a) | Indicator No. 10 in Table 1 and Indicator No. 14 in Table 3 of Annex I | Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Article 12, paragraph 1 | 308            |
| ESRS 2 - SBM3 - S2<br>Significant risk of child labour or forced labour in the value chain, paragraph 11, point b)                                | Indicators Nos. 12 and 13 of Table 3 of Annex I                        |                                                                                                             | Not applicable |

|                                                                                                                                                            |                                                                       |                                                                                                             |                |
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| ESRS S2-1<br>Political commitments on Human Rights section 17                                                                                              | Indicator No. 9 in Table 3 and Indicator No. 11 in Table 1 of Annex 1 |                                                                                                             | Not applicable |
| ESRS S2-1 Policies related to heat chain workers section 18                                                                                                | Indicators Nos. 11 and 4 of Table 3 of Annex 1                        |                                                                                                             | Not applicable |
| ESRS S1-1. Non-compliance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines section 19                       | Indicator No. 10 of Table 1 of Annex 1                                | Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Article 12, paragraph 1 | Not applicable |
| ESRS S2-1<br>Due diligence policies regarding the issues covered by Fundamental Conventions 1 to 8 of the International Labour organisation section 19     |                                                                       | Delegated Regulation (EU) 2020/1816, Annex II                                                               | Not applicable |
| ESRS S2-4<br>Human Rights problems and impacts related to the upstream and downstream phases of its value chain section 36                                 | Indicator No. 14 of Table 3 of Annex 1                                |                                                                                                             | Not applicable |
| ESRS S3-1<br>Political commitments on Human Rights, section 16                                                                                             | Indicator No. 9 in Table 3 and Indicator No. 11 in Table 1 of Annex 1 |                                                                                                             | Not applicable |
| ESRS S3-1<br>Non-compliance with the United Nations Guiding Principles on Business and Human Rights, the ILO principles and the OECD Guidelines section 17 | Indicator No. 10 of Table 1 of Annex 1                                | Delegated Regulation (EU) 2020/1816, Annex II; Delegated Regulation (EU) 2020/1818, Article 12, paragraph 1 | Not applicable |
| ESRS S3-4<br>Human Rights problems and impacts, section 36                                                                                                 | Indicator No. 14 of Table 3 of Annex 1                                |                                                                                                             | Not applicable |

|                                                                                                                                        |                                                                       |                                                                                                                |                |
|----------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|----------------|
| ESRS S3-1<br>Political commitments on Human Rights, section 16                                                                         | Indicator No. 10 of Table 1 of Annex 1                                | Delegated Regulation (EU) 2020/1816, Annex II;<br>Delegated Regulation (EU) 2020/1818, Article 12, paragraph 1 | Not applicable |
| ESRS S3-4<br>Human Rights problems and impacts, section 36                                                                             | Indicator No. 14 of Table 3 of Annex 1                                |                                                                                                                | Not applicable |
| ESRS S4-1 Policies related to consumers and end users section 16                                                                       | Indicator No. 9 in Table 3 and Indicator No. 11 in Table 1 of Annex 1 |                                                                                                                | 310            |
| ESRS S4-1<br>Non-compliance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines section 17 | Indicator No. 10 of Table 1 of Annex 1                                | Delegated Regulation (EU) 2020/1816, Annex II;<br>Delegated Regulation (EU) 2020/1818, Article 12, paragraph 1 | 310            |
| ESRS S4-4<br>Human Rights problems and impacts, section 35                                                                             | Indicator No. 14 of Table 3 of Annex 1                                |                                                                                                                | 322            |
| ESRS G1-1<br>United Nations Convention against Corruption, paragraph 10, point b)                                                      | Indicator No. 15 of Table 3 of Annex 1                                |                                                                                                                | 326            |
| ESRS G1-1<br>Protection of whistleblowers section 10, letter d)                                                                        | Indicator No. 6 of Table 3 of Annex 1                                 |                                                                                                                | 326            |
| ESRS G1-4<br>Fines for breaching anti-corruption and bribery laws, paragraph 24(a)                                                     | Indicator No. 17 of Table 3 of Annex 1                                | Delegated Regulation (EU) 2020/1816, Annex II                                                                  | 346            |
| ESRS G1-4<br>Rules for combating corruption and bribery section 24, letter b)                                                          | Indicator No. 16 of Table 3 of Annex 1                                |                                                                                                                | 346            |

**Annex III: Requirements of Law 11/2018 regarding Non-Financial Information**

| Areas                 | Requirements                                                                                                                                                                                                                                                                               | Reporting Framework*                                                                                                                                                          | Chapter of the Report                                                                                                                                                                                                                                                                                                                                                                  | Report Page                                                                                                                                                          |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                       | <b>Taxonomy</b>                                                                                                                                                                                                                                                                            | Proprietary methodology based on compliance with EU Regulation 2020/852                                                                                                       | Taxonomy                                                                                                                                                                                                                                                                                                                                                                               | Pages 212-231                                                                                                                                                        |
| <b>Business model</b> | A brief description of the group's business model, including:<br>1.) its business environment,<br>2.) its organisation and structure,<br>3.) the markets in which it operates,<br>4.) its goals and strategies,<br>5.) the main factors and trends that may affect its future development. | ESRS 2 BP and SBM, MDR-P<br>ESRS E1 GOV-1, E1-2, E1-4<br>E2-1, E2-3<br>E3-1, E3-3<br>E4-2, E4-4<br>E5-1, E5-3<br>S1-1, S1-5<br>S2-1, S2-5<br>S3-3, S3-5<br>S4-1, S4-5<br>G1-1 | Basis for preparation<br>Strategy<br>Climate change (ESRS E1)<br>Pollution (ESRS E2)<br>Water and marine resources (ESRS E3)<br>Biodiversity and ecosystems (ESRS E4)<br>Resource use and circular economy (ESRS E5)<br>Own workforce (ESRS S1)<br>Consumers and end-users (ESRS S4)<br>Business conduct (ESRS G1)<br><br>*Non-material matters for the Group (E2, E3, E4, E5, S2, S3) | P. 149-154<br>P. 171-203<br>P. 232-233; 238-240; 243-246<br>Page 256<br>Page 257<br>Page 258<br>Page 259<br>P. 269-279, 295-299<br>P. 310-316, 324-325<br>P. 326-330 |

|                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                     |                                                                                     |                                                                                                                                 |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Policies</b></p>            | <p>A description of the policies the group applies regarding these issues, which will include:</p> <p>1.) the due diligence procedures applied for the identification, assessment, prevention, and mitigation of significant risks and impacts;</p> <p>2.) the verification and control procedures, including what measures have been adopted.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p>ESRS 2 BP and SMB, MDR-P Policies; ESRS G1-1</p> | <p>Basis for preparation</p> <p>Strategy</p> <p>Business conduct (ESRS G1)</p>      | <p>Pages 149-154</p> <p>Pages 171-202</p> <p>Pages 326-330</p> <p>*MDR-P included throughout the report in the policy brief</p> |
| <p><b>ST, MT and LT risks</b></p> | <p>The main risks related to these issues linked to the group's activities, including, where relevant and proportionate, its business relationships, products, or services that may have negative effects in these areas, and:</p> <p>* how the group manages these risks,</p> <p>* explaining the procedures used to detect and assess them in accordance with the relevant national, European, or international frameworks for each matter.</p> <p>* Information on any impacts identified should be included, providing a breakdown of these, particularly the main short-, medium-, and long-term risks.</p>                                                                                                                                                                                                                                                                                                                                                                                                                              | <p>ESRS 2 GOV 5; ESRS 2 IRO-1, SBM-3</p>            | <p>Governance</p> <p>Incident, Risk, and Opportunity Management</p> <p>Strategy</p> | <p>P. 167-170</p> <p>Pages 203-209</p> <p>P. 194-202</p>                                                                        |
| <p><b>KPIs</b></p>                | <p>Key non-financial performance indicators that are relevant to the specific business activity and that meet the criteria of comparability, materiality, relevance, and reliability.</p> <p>* To facilitate the comparison of information, both over time and between entities, non-financial key performance indicator standards that can be generally applied and that comply with the European Commission's guidelines on this matter and the Global Reporting Initiative standards will be used. The report must mention the national, European, or international framework used for each matter.</p> <p>* Non-financial key performance indicators must be applied to each section of the Non-Financial Information statement.</p> <p>* These indicators must be useful, taking into account the specific circumstances, and consistent with the parameters used in the company's internal risk management and assessment procedures.</p> <p>* In any case, the information presented must be accurate, comparable, and verifiable.</p> |                                                     | <p>Annex 1. Law 11/2018</p>                                                         | <p>Pages 391-408</p>                                                                                                            |

|                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                          |                                                                                                     |                                                                                                       |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| <b>Environmental issues</b>          | Global Environment                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                          |                                                                                                     |                                                                                                       |
|                                      | <p>1. Detailed information on the current and foreseeable effects of the company's activities on the environment and, where applicable, on health and safety.</p> <p>2. Environmental assessment or certification procedures.</p> <p>3. Resources dedicated to the prevention of environmental risks.</p> <p>4. Application of the precautionary principle, and the amount of provisions and safeguards for environmental risks (e.g., those arising from environmental liability law).</p> | <p>1) ESRS SBM-3; E1-9; E2-6; E3-5; E4-6; E5-6.</p> <p>2) GRI 3-3</p> <p>3) E1-3; E2-2; E3-2; E4-3; E5-2; ESRS 2 GOV-1.</p> <p>4) E1-1; E1-3; E2-2; E3-2; E4-3; E5-2</p> | <p>Climate Change (ESRS E1)</p> <p>Incident, Risk, and Opportunity Management</p> <p>Governance</p> | <p>P. 232-233; 254-255</p> <p>P. 204-210</p> <p>Pages 240-242; 156-163</p> <p>P. 236-237; 241-243</p> |
|                                      | Pollution                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                          |                                                                                                     |                                                                                                       |
|                                      | <p>1. Measures to prevent, reduce, or repair carbon emissions that seriously affect the environment;</p> <p>2. Taking into account any form of air pollution specific to an activity, including noise and light pollution.</p>                                                                                                                                                                                                                                                              | <p>1) ESRS E1-1, E1-3</p> <p>2) ESRS E2-2</p>                                                                                                                            | <p>Climate change (ESRS E1)</p> <p>Pollution (ESRS E2)</p>                                          | <p>P. 236-237; 241-243</p> <p>Page 255</p>                                                            |
|                                      | Circular economy and waste prevention and management                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                          |                                                                                                     |                                                                                                       |
|                                      | Circular economy                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | ESRS E5-2                                                                                                                                                                | <p>Resource Use and Circular Economy (ESRS E5)</p> <p>Annex 1. Law 11/2018</p>                      | <p>Page 258</p> <p>Pages 392-408</p>                                                                  |
|                                      | Waste: Prevention measures, recycling, reuse, other forms of recovery and disposal of waste;                                                                                                                                                                                                                                                                                                                                                                                                | GRI 3-3                                                                                                                                                                  | Impacts, risks and opportunities management                                                         | Pages 204-210                                                                                         |
|                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | GRI 306-1                                                                                                                                                                | Annex 1. Law 11/2018                                                                                | Pages 392-408                                                                                         |
|                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | ESRS E5-2                                                                                                                                                                | Resource use and circular economy (ESRS E5)                                                         | Page 259                                                                                              |
|                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | GRI 306-2                                                                                                                                                                | Annex 1. Law 11/2018                                                                                | Pages 392-408                                                                                         |
| GRI 306-3                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Annex 1. Law 11/2018                                                                                                                                                     | Pages 392-408                                                                                       |                                                                                                       |
| <b>Actions to combat food waste.</b> | GRI 3-3                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Impacts, risks and opportunities management                                                                                                                              | Pages 204-210                                                                                       |                                                                                                       |

| Sustainable use of resources                                                                                         |                        |                                             |               |
|----------------------------------------------------------------------------------------------------------------------|------------------------|---------------------------------------------|---------------|
| Water consumption and water supply in accordance with local limitations;                                             | GRI 303-5              | Annex 1. Law 11/2018                        | Pages 392-409 |
|                                                                                                                      | ESRS E3-4              | Water and marine resources (ESRS E-3)       | Page 256      |
| Consumption of raw materials and the measures taken to improve the efficiency of their use;                          | GRI 3-3                | Annex 1. Law 11/2018                        | Pages 392-409 |
|                                                                                                                      | ESRS E5-4              | Resource use and circular economy (ESRS E5) | Page 258      |
|                                                                                                                      | GRI 301-1              | Annex 1. Law 11/2018                        | Pages 392-409 |
| Direct and indirect energy consumption, measures taken to improve energy efficiency and the use of renewable energy. | GRI 3-3                | Annex 1. Law 11/2018                        | Pages 392-409 |
|                                                                                                                      | GRI 302-1<br>ESRS E1-5 | Climate change (ESRS E1)                    | Pages 246-247 |
|                                                                                                                      | GRI 302-3<br>ESRS E1-5 | Climate change (ESRS E1)                    | Pages 246-247 |
|                                                                                                                      | GRI 302-4              | Annex 1. Law 11/2018                        | Pages 392-409 |

| Climate change                                                                                                     |                                                                                                                                                                |                                       |                                             |                        |
|--------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|---------------------------------------------|------------------------|
| Environmental issues                                                                                               | The important elements of greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces; | GRI 3-3                               | Impacts, risks and opportunities management | Pages 204-210          |
|                                                                                                                    |                                                                                                                                                                | GRI 305-1<br>ESRS E1-6                | Climate change (ESRS E1)                    | Pages 247-251          |
|                                                                                                                    |                                                                                                                                                                | GRI 305-2<br>ESRS E1-6                | Climate change (ESRS E1)                    | Pages 247-251          |
|                                                                                                                    |                                                                                                                                                                | GRI 305-5                             | Annex 1. Law 11/2018                        | Pages 392-409          |
|                                                                                                                    | The measures adopted to adapt to the consequences of climate change;                                                                                           | ESRS E1-1 and E1-3                    | Climate change (ESRS E1)                    | Pages 237-238; 239-240 |
|                                                                                                                    | The voluntarily established medium- and long-term emission reduction targets to reduce greenhouse gas emissions and the measures implemented for this purpose. | ESRS E1-4                             | Climate change (ESRS E1)                    | Pages 242-246          |
|                                                                                                                    | Biodiversity protection                                                                                                                                        |                                       |                                             |                        |
| Measures taken to preserve or restore biodiversity. Impacts caused by activities or operations in protected areas. | ESRS E-4-3                                                                                                                                                     | Biodiversity and ecosystems (ESRS E4) | Page 257                                    |                        |
|                                                                                                                    | ESRS 2 SBM-3                                                                                                                                                   | Strategy                              | Pages 202-203                               |                        |

| Employment                  |                                                                                                                                 |           |                                  |               |
|-----------------------------|---------------------------------------------------------------------------------------------------------------------------------|-----------|----------------------------------|---------------|
| Social and personnel issues | Total number and distribution of employees by sex, age, country and professional classification;                                | GRI 3-3   | Impacts, risks and opportunities | Pages 204-211 |
|                             |                                                                                                                                 | GRI 2-7   | Annex 1. Law 11/2018             | Pages 392-408 |
|                             |                                                                                                                                 | GRI 405-1 | Annex 1. Law 11/2018             | Pages 392-408 |
|                             |                                                                                                                                 | ESRS S1-6 | Own workforce (ESRS S1)          | Pages 298-300 |
|                             | Total number and distribution of employment contract types,                                                                     | GRI 2-7   | Annex 1. Law 11/2018             | Pages 392-408 |
|                             |                                                                                                                                 | ESRS S1-6 | Own workforce (ESRS S1)          | Pages 298-300 |
|                             | Annual average of permanent contracts, temporary contracts and part-time contracts by sex, age and professional classification, | GRI 2-7   | Annex 1. Law 11/2018             | Pages 392-408 |
|                             |                                                                                                                                 | GRI 405-1 | Annex 1. Law 11/2018             | Pages 392-408 |

|                             |                                                                                                                                                                                                 |            |                                             |               |
|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|---------------------------------------------|---------------|
| Social and personnel issues | Number of dismissals by sex, age and professional classification;                                                                                                                               | GRI 401-1  | Annex 1. Law 11/2018                        | Pages 392-408 |
|                             | Average wages and their evolution broken down by sex, age and professional classification or equal value;                                                                                       | GRI 3-3    | Impacts, risks and opportunities management | Pages 203-210 |
|                             |                                                                                                                                                                                                 | GRI 405-2  | Annex 1. Law 11/2018                        | Pages 392-408 |
|                             | Pay gap, the remuneration of equal or average jobs in society,                                                                                                                                  | GRI 3-3    | Impacts, risks and opportunities management | Pages 203-210 |
|                             |                                                                                                                                                                                                 | GRI 405-2  | Annex 1. Law 11/2018                        | Pages 392-408 |
|                             |                                                                                                                                                                                                 | ESRS S1-16 | Own workforce (ESRS S1)                     | Pages 306-307 |
|                             | The average remuneration of directors and managers, including variable remuneration, allowances, severance pay, payments to long-term savings plans and any other income broken down by gender, | GRI 3-3    | Impacts, risks and opportunities management | Pages 203-210 |
|                             |                                                                                                                                                                                                 | GRI 2-19   | Annex 1. Law 11/2018                        | Pages 392-408 |
|                             | Implementation of policies on disconnecting from work,                                                                                                                                          | GRI 3-3    | Incident, Risk, and Opportunity Management  | Pages 203-211 |
|                             |                                                                                                                                                                                                 | ESRS S1-1  | Own workforce (ESRS S1)                     | Pages 269-279 |
|                             | Employees with functional diversity.                                                                                                                                                            | GRI 3-3    | Impacts, risks and opportunities management | Pages 203-210 |
|                             |                                                                                                                                                                                                 | GRI 405-1  | Annex 1. Law 11/2018                        | Pages 391-408 |
|                             |                                                                                                                                                                                                 | ESRS S1-12 | Own workforce (ESRS S1)                     | Page 303      |

|                                    |                                                                                                                            |                           |                         |                                        |
|------------------------------------|----------------------------------------------------------------------------------------------------------------------------|---------------------------|-------------------------|----------------------------------------|
| <b>Social and personnel issues</b> | Organisation of work                                                                                                       |                           |                         |                                        |
|                                    | Organisation of work time                                                                                                  | ESRS S1-1, S1-6 and S1-15 | Own workforce (ESRS S1) | P. 269-279<br>P. 298-300<br>P. 305-306 |
|                                    | Number of hours of absenteeism                                                                                             | GRI 403-9                 | Annex 1. Law 11/2018    | Pages 391-408                          |
|                                    |                                                                                                                            | GRI 403-10                | Annex 1. Law 11/2018    | Pages 391-408                          |
|                                    | Measures aimed at facilitating the enjoyment of work-life balance and promoting the shared responsibility of both parents. | ESRS S1-4                 | Own workforce (ESRS S1) | Pages 286-294                          |

|                                                                                               |                                                                                                                                                                  |                                                                |                                                              |               |
|-----------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|--------------------------------------------------------------|---------------|
|                                                                                               | Health and safety                                                                                                                                                |                                                                |                                                              |               |
|                                                                                               | Occupational health and safety conditions; Occupational accidents, in particular their frequency and seriousness; Occupational illnesses, broken down by gender. | ESRS S1-14                                                     | *Is not a material matter for the Group                      | -             |
|                                                                                               |                                                                                                                                                                  | GRI 403-9                                                      | Annex 1. Law 11/2018                                         | Pages 391-408 |
|                                                                                               |                                                                                                                                                                  | GRI 403-10                                                     | Annex 1. Law 11/2018                                         | Pages 391-408 |
|                                                                                               | Social relationships                                                                                                                                             |                                                                |                                                              |               |
|                                                                                               | Organisation of social dialogue, including procedures for notifying and consulting personnel and negotiating with them;                                          | ESRS S1-2 and S1-8                                             | Own workforce (ESRS S1)<br>*S1-8 not material for the Group  | Pages 279-283 |
|                                                                                               | Percentage of employees covered by collective bargaining agreements by country;                                                                                  | ESRS S1-8                                                      | *Not a material matter for the Group<br>Annex 1. Law 11/2018 | Pages 390-407 |
| The balance of collective agreements, particularly in the field of health and safety at work. | ESRS S1-8 and S1-14                                                                                                                                              | *Non-material matters for the Group<br>Own personnel (ESRS S1) | -                                                            |               |

|                                                                                                                                                                                                                                                                  |                                                                                                                                                                                          |                          |                                                                 |               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|-----------------------------------------------------------------|---------------|
| <b>Social and personnel issues</b>                                                                                                                                                                                                                               | Mechanisms and procedures that the company has in place to promote the involvement of workers in the management of the Company, in terms of information, consultation and participation. | ESRS S1-2 and S1-8       | Own workforce (ESRS S1)<br><br>*S1-8 not material for the Group | Pages 279-283 |
|                                                                                                                                                                                                                                                                  | <b>Training</b>                                                                                                                                                                          |                          |                                                                 |               |
|                                                                                                                                                                                                                                                                  | The policies implemented in the field of training;                                                                                                                                       | ESRS S1-1                | Own workforce (ESRS S1)                                         | P. 269-279    |
|                                                                                                                                                                                                                                                                  |                                                                                                                                                                                          | ESRS S1-13               | Own workforce (ESRS S1)                                         | P. 302-305    |
|                                                                                                                                                                                                                                                                  | The total number of training hours by professional category.                                                                                                                             | GRI 404-1                | Annex 1. Law 11/2018                                            | Pages 391-408 |
|                                                                                                                                                                                                                                                                  |                                                                                                                                                                                          | ESRS S1-13               | Own workforce (ESRS S1)                                         | Pages 302-305 |
|                                                                                                                                                                                                                                                                  | Universal accessibility for people with functional diversity                                                                                                                             | ESRS S1-12               | Own workforce (ESRS S1)                                         | Pages 302     |
|                                                                                                                                                                                                                                                                  |                                                                                                                                                                                          |                          | Annex 1. Law 11/2018                                            | Pages 391-408 |
|                                                                                                                                                                                                                                                                  | <b>Equality</b>                                                                                                                                                                          |                          |                                                                 |               |
|                                                                                                                                                                                                                                                                  | Measures adopted to promote equal treatment and opportunities between women and men;                                                                                                     | ESRS S1-3, S1-4 and S1-9 | Own workforce (ESRS S1)                                         | P. 282-284    |
| P. 282 – 294<br>P. 300                                                                                                                                                                                                                                           |                                                                                                                                                                                          |                          |                                                                 |               |
| Equality plans (Chapter III of Law 3/2007, of 22 March, for effective equality between men and women), measures adopted to promote employment, protocols against sexual and gender harassment, the integration and universal accessibility for disabled persons; | ESRS S1-1, S1-4 and S1-9                                                                                                                                                                 | Own workforce (ESRS S1)  | P. 269-279                                                      |               |
|                                                                                                                                                                                                                                                                  |                                                                                                                                                                                          |                          | P. 269 – 279<br>P. 301                                          |               |
| Policy against all types of discrimination and, where applicable, for diversity management.                                                                                                                                                                      | ESRS S1-1 and S1-9                                                                                                                                                                       | Own workforce (ESRS S1)  | Pages 268-278; 300                                              |               |

|              |                                                                                                                                                                                                             |                                                                             |                                                                                                                                                                 |                                                                         |
|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| Human Rights | <p>Application of Human Rights due diligence procedures.</p> <p>Prevention of risks of Human Rights violations and, where applicable, measures to mitigate, manage, and redress any abuses committed.</p>   | <p>ESRS 2 GOV-4,<br/>ESRS 2 SBM-2; S1-1;<br/>S1-4; S2-4; S3-4;<br/>S4-4</p> | <p>Governance</p> <p>Strategy</p> <p>Own Personnel (ESRS S1)</p> <p>Consumers and End Users (ESRS S4)</p> <p>*ESRS S2 and S3 are not material for the Group</p> | <p>P. 164-165</p> <p>P. 188-189</p> <p>P. 284-293</p> <p>P. 320-323</p> |
|              | Complaints regarding cases of Human Rights violations;                                                                                                                                                      | GRI 3-3                                                                     | Impacts, risks and opportunities management                                                                                                                     | Pages 202-209                                                           |
|              |                                                                                                                                                                                                             | <p>ESRS S1-17<br/>GRI 3-3</p> <p>GRI 406-1</p>                              | <p>Own workforce (ESRS S1)</p> <p>Consumers and end users (ESRS S4)</p>                                                                                         | <p>Pages 306-307</p> <p>Page 307</p>                                    |
|              | Promotion and compliance with the provisions of the fundamental conventions of the International Labour organisation relating to respect for freedom of association and the right to collective bargaining; | <p>ESRS S1-1<br/>ESRS S2-1</p>                                              | <p>Own personnel (ESRS S1)</p> <p>*ESRS S2 is not material for the Group</p>                                                                                    | Pages 268-278; 281-284                                                  |
|              | The elimination of discrimination in employment and occupation;                                                                                                                                             | ESRS S-1 and S2-1                                                           | <p>Own personnel (ESRS S1)</p> <p>*ESRS S2 is not material for the Group</p>                                                                                    | Pages 268-278                                                           |
|              | The elimination of forced or compulsory labor;                                                                                                                                                              | ESRS S-1 and S2-1                                                           | <p>Own personnel (ESRS S1)</p> <p>*ESRS S2 is not material for the Group</p>                                                                                    | Pages 268-278                                                           |

|  |                                         |                   |                                                                   |               |
|--|-----------------------------------------|-------------------|-------------------------------------------------------------------|---------------|
|  | The effective abolition of child labor. | ESRS S-1 and S2-1 | Own personnel (ESRS S1)<br>*ESRS S2 is not material for the Group | Pages 268-278 |
|--|-----------------------------------------|-------------------|-------------------------------------------------------------------|---------------|

|                        |                                                       |           |                                                                    |               |
|------------------------|-------------------------------------------------------|-----------|--------------------------------------------------------------------|---------------|
| Corruption and bribery | Measures taken to prevent corruption and bribery;     | G1-3      | *Not a material matter for the Group<br>Business conduct (ESRS G1) | Pages 324-329 |
|                        | Measures to combat money laundering,                  | G1-3      | Annex 1. Law 11/2018                                               | Pages 390     |
|                        | Contributions to foundations and non-profit entities. | GRI 413-1 | Annex 1. Law 11/2018                                               | Pages 390     |

| Company commitments to sustainable development     |                                                                                                                            |                                        |                                      |                            |               |
|----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|----------------------------------------|--------------------------------------|----------------------------|---------------|
| Society                                            | The impacts of the company's activity on employment and local development;                                                 | GRI 3-3                                | Annex 1. Law 11/2018                 | Page 397                   |               |
|                                                    |                                                                                                                            | GRI 203-1                              | Annex 1. Law 11/2018                 | Page 397                   |               |
|                                                    |                                                                                                                            | GRI 203-2                              | Annex 1. Law 11/2018                 | Page 397                   |               |
|                                                    |                                                                                                                            | GRI 413-1                              | Annex 1. Law 11/2018                 | Page 397                   |               |
|                                                    |                                                                                                                            | ESRS 2- SBM3                           | General Disclosure (ESRS 2)          | Page 193                   |               |
|                                                    | The impacts of the company's activity on local populations and the territory;                                              | GRI 203-1                              | Annex 1. Law 11/2018                 | Pages 399                  |               |
|                                                    |                                                                                                                            | GRI 203-2                              | Annex 1. Law 11/2018                 | Pages 399                  |               |
|                                                    |                                                                                                                            | GRI 413-1                              | Annex 1. Law 11/2018                 | Pages 399                  |               |
|                                                    |                                                                                                                            | ESRS 2- SBM3                           | General Disclosure (ESRS 2)          | Page 193                   |               |
|                                                    | The relationships maintained with actors in local communities and the modalities of dialogue with them;                    | GRI 2-29                               | Annex 1. Law 11/2018                 | Pages 399                  |               |
|                                                    |                                                                                                                            | GRI 413-1                              | Annex 1. Law 11/2018                 | Pages 399                  |               |
|                                                    | Partnership or sponsorship actions.                                                                                        | GRI 2-28                               | Annex 1. Law 11/2018                 | Page 399                   |               |
|                                                    | Subcontracting and suppliers                                                                                               |                                        |                                      |                            |               |
|                                                    | * The inclusion of social, gender equality, and environmental issues in purchasing policies;                               | ESRS S2-1                              | *Not a material matter for the Group | Business conduct (ESRS G1) | Pages 328-329 |
|                                                    | * Consideration of the social and environmental responsibility of suppliers and subcontractors in relationships with them; |                                        |                                      |                            |               |
| Monitoring and auditing systems and their results. | ESRS S2-2, S2-3, S2-4, G1-2                                                                                                | *ESRS S2 is not material for the Group | Business conduct (ESRS G1)           | Pages 328-329              |               |

| Consumers       |                                                              |           |                                                                    |                            |
|-----------------|--------------------------------------------------------------|-----------|--------------------------------------------------------------------|----------------------------|
|                 | Measures for the health and safety of consumers;             | ESRS S4-4 | Consumers and end users (ESRS S4)                                  | Pages 320-323              |
|                 | Complaint systems, complaints received and their resolution. | GRI 3-3   | Impacts, risks and opportunities management                        | Pages 202-209              |
|                 |                                                              | GRI 416-2 | Consumers and end users (ESRS S4)                                  | Pages 313-316              |
| Tax information |                                                              |           |                                                                    |                            |
|                 | Profits earned country by country<br>Taxes paid on profits   | GRI 3-3   | Incident, Risk, and Opportunity Management<br>Annex 1. Law 11/2018 | Pages 202-209<br>Pages 403 |
|                 | Public subsidies received                                    | GRI 201-4 | Annex 1. Law 11/2018                                               | Pages 403                  |

## Annex IV. List of Disclosure Requirements.

| ESRS                         | Disclosure Requirement (DR) | Report Section                              |
|------------------------------|-----------------------------|---------------------------------------------|
| <b>2- General Disclosure</b> | BP-1                        | Basis for preparation                       |
|                              | BP-2                        | Basis for preparation                       |
|                              | GOV-1                       | Governance                                  |
|                              | GOV-2                       | Governance                                  |
|                              | GOV-3                       | Governance                                  |
|                              | GOV-4                       | Governance                                  |
|                              | GOV-5                       | Governance                                  |
|                              | SBM-1                       | Strategy                                    |
|                              | SBM-2                       | Strategy                                    |
|                              | SBM-3                       | Strategy                                    |
|                              | IRO-1                       | Impacts, risks and opportunities management |
|                              | IRO-2                       | Impacts, risks and opportunities management |

|                                                |                          |                                             |
|------------------------------------------------|--------------------------|---------------------------------------------|
| <b>E1- Climate Change</b>                      | GOV-3                    | Climate Change (ESRS E1)                    |
|                                                | SBM-3                    | Climate Change (ESRS E1)                    |
|                                                | IRO-1                    | Climate Change (ESRS E1)                    |
|                                                | E1-1                     | Climate Change (ESRS E1)                    |
|                                                | E1-2                     | Climate Change (ESRS E1)                    |
|                                                | E1-3                     | Climate Change (ESRS E1)                    |
|                                                | E1-4                     | Climate Change (ESRS E1)                    |
|                                                | E1-5                     | Climate Change (ESRS E1)                    |
|                                                | E1-6                     | Climate Change (ESRS E1)                    |
|                                                | E1-7                     | Climate Change (ESRS E1)                    |
|                                                | E1-8                     | Climate Change (ESRS E1)                    |
| E1-9*                                          | Climate Change (ESRS E1) |                                             |
| <b>E2 – Pollution*</b>                         | IRO-1                    | Pollution (ESRS E2)                         |
| <b>E3 – Water and marine resources*</b>        | IRO-1                    | Water and marine resources (ESRS E3)        |
| <b>E4 – Biodiversity and ecosystems*</b>       | IRO-1                    | Biodiversity and ecosystems (ESRS E4)       |
| <b>E5 – Resource use and Circular Economy*</b> | IRO-1                    | Resource Use and Circular Economy (ESRS E5) |
| <b>ES - Investment with ESG criteria</b>       | GOV-1                    | ESG (Entity-specific) Investment            |
|                                                | SBM-3                    | ESG (Entity-specific) Investment            |
|                                                | IRO-1                    | ESG (Entity-specific) Investment            |
|                                                | MDR-P                    | ESG (Entity-specific) Investment            |
|                                                | MDR-A                    | ESG (Entity-specific) Investment            |
|                                                | MDR-M                    | ESG (Entity-specific) Investment            |
|                                                | MDR-T                    | ESG (Entity-specific) Investment            |

|                                         | SBM-2  | Strategy                |
|-----------------------------------------|--------|-------------------------|
|                                         | SBM-3  | Own workforce (ESRS S1) |
|                                         | S1-1   | Own workforce (ESRS S1) |
|                                         | S1-2   | Own workforce (ESRS S1) |
|                                         | S1-3   | Own workforce (ESRS S1) |
|                                         | S1-4   | Own workforce (ESRS S1) |
|                                         | S1-5   | Own workforce (ESRS S1) |
|                                         | S1-6   | Own workforce (ESRS S1) |
|                                         | S1-7   | Own workforce (ESRS S1) |
|                                         | S1-8*  | -                       |
|                                         | S1-9   | Own workforce (ESRS S1) |
|                                         | S1-10  | Own workforce (ESRS S1) |
|                                         | S1-11  | Own workforce (ESRS S1) |
|                                         | S1-12  | Own workforce (ESRS S1) |
|                                         | S1-13  | Own workforce (ESRS S1) |
|                                         | S1-14* | -                       |
|                                         | S1-15  | Own workforce (ESRS S1) |
|                                         | S1-16  | Own workforce (ESRS S1) |
|                                         | S1-17  | Own workforce (ESRS S1) |
| <b>S1 – Own workforce</b>               |        |                         |
| <b>S2 – Workers in the value chain*</b> | -      | -                       |
| <b>S3 – Affected communities*</b>       | -      | -                       |

|                                     |       |                                         |
|-------------------------------------|-------|-----------------------------------------|
| <b>S4 – Consumers and end-users</b> | SBM-2 | Strategy                                |
|                                     | SBM-3 | Consumers and end users (ESRS S4)       |
|                                     | S4-1  | Consumers and end users (ESRS S4)       |
|                                     | S4-2  | Consumers and end users (ESRS S4)       |
|                                     | S4-3  | Consumers and end users (ESRS S4)       |
|                                     | S4-4  | Consumers and end users (ESRS S4)       |
|                                     | S4-5  | Consumers and end users (ESRS S4)       |
| <b>G1- Business Conduct</b>         | GOV-1 | Business conduct (ESRS G1)              |
|                                     | IRO-1 | Business conduct (ESRS G1)              |
|                                     | G1-1  | Business conduct (ESRS G1)              |
| <b>ES – Regulatory compliance</b>   | GOV-1 | Regulatory compliance (Entity-specific) |
|                                     | SBM-3 | Regulatory compliance (Entity-specific) |
|                                     | IRO-1 | Regulatory compliance (Entity-specific) |
|                                     | MDR-P | Regulatory compliance (Entity-specific) |
|                                     | MDR-A | Regulatory compliance (Entity-specific) |
|                                     | MDR-M | Regulatory compliance (Entity-specific) |
|                                     | MDR-T | Regulatory compliance (Entity-specific) |

|                                           |       |                                                 |
|-------------------------------------------|-------|-------------------------------------------------|
| <b>ES – Risk Management</b>               | GOV-1 | Risk Management (Entity-specific)               |
|                                           | SBM-3 | Risk Management (Entity-specific)               |
|                                           | IRO-1 | Risk Management (Entity-specific)               |
|                                           | MDR-P | Risk Management (Entity-specific)               |
|                                           | MDR-A | Risk Management (Entity-specific)               |
|                                           | MDR-M | Risk Management (Entity-specific)               |
|                                           | MDR-T | Risk Management (Entity-specific)               |
| <b>ES – Digitalisation and innovation</b> | GOV-1 | Digitalisation and innovation (Entity-specific) |
|                                           | SBM-3 | Digitalisation and innovation (Entity-specific) |
|                                           | IRO-1 | Digitalisation and innovation (Entity-specific) |
|                                           | MDR-P | Digitalisation and innovation (Entity-specific) |
|                                           | MDR-A | Digitalisation and innovation (Entity-specific) |
|                                           | MDR-M | Digitalisation and innovation (Entity-specific) |
|                                           | MDR-T | Digitalisation and innovation (Entity-specific) |

|                                               |       |                                                     |
|-----------------------------------------------|-------|-----------------------------------------------------|
| <b>ES – ESG Product Design</b>                | GOV-1 | ESG product design (Entity-specific)                |
|                                               | SBM-3 | ESG product design (Entity-specific)                |
|                                               | IRO-1 | ESG product design (Entity-specific)                |
|                                               | MDR-P | ESG product design (Entity-specific)                |
|                                               | MDR-A | ESG product design (Entity-specific)                |
|                                               | MDR-M | ESG product design (Entity-specific)                |
|                                               | MDR-T | ESG product design (Entity-specific)                |
| <b>ES – Cybersecurity and data protection</b> | GOV-1 | Cybersecurity and data protection (Entity-specific) |
|                                               | SBM-3 | Cybersecurity and data protection (Entity-specific) |
|                                               | IRO-1 | Cybersecurity and data protection (Entity-specific) |
|                                               | MDR-P | Cybersecurity and data protection (Entity-specific) |
|                                               | MDR-A | Cybersecurity and data protection (Entity-specific) |
|                                               | MDR-M | Cybersecurity and data protection (Entity-specific) |
|                                               | MDR-T | Cybersecurity and data protection (Entity-specific) |

The consolidated report of Línea Directa Aseguradora for the financial year ending 31 December 2025, which includes the information from the Consolidated Non-Financial Information Statement and the Sustainability Report that forms part of the Consolidated Management Report, was approved by the Board of Directors at its meeting on 19 February 2026.

|                                                         |                                         |
|---------------------------------------------------------|-----------------------------------------|
| Mr. Alfonso Botín-Sanz de Sautuola y Naveda<br>Chairman | Mrs. Patricia Ayuela de Rueda<br>CEO    |
| Mrs. Rita Estévez Luaña<br>Director                     | Ms. Ana María Plaza Arregui<br>Director |
| Mr. Fernando Masaveu Herrero<br>Director                | Ms. Marina Specht Blum<br>Director      |
| Mr. Iñaki Berenguer Mediavilla<br>Director              |                                         |

RECORD stating that the annual accounts do not feature the signatures of any directors, whether handwritten or via a recognised electronic signature, due to practical limitations arising from technical constraints. These constraints stem from the format and labelling requirements mandated by Delegated Regulation EU 2018/815 of the European Commission.

Pablo González-Schwitters Grimaldo – Secretary of the Board

**Línea Directa Aseguradora, S.A.,  
Compañía de Seguros y Reaseguros  
and its subsidiaries**

Limited assurance report issued by a practitioner  
on the Consolidated Non-Financial Information  
Statement and Sustainability Information  
for the year ended 31 December 2025



*This version of our report is a free translation of the original, which was prepared in Spanish. All possible care has been taken to ensure that the translation is an accurate representation of the original. However, in all matters of interpretation of information, views or opinions, the original language version of our report takes precedence over this translation.*

## **Limited assurance report issued by a practitioner on the Consolidated Non-Financial Information Statement and Sustainability Information**

To the shareholders of Línea Directa Aseguradora, S.A., Compañía de Seguros y Reaseguros on behalf of the administrators:

### **Limited assurance conclusion**

Pursuant to article 49 of the Code of Commerce, we have conducted a limited assurance engagement on the accompanying Consolidated Non-Financial Information Statement (hereinafter, NFIS) for the year ended 31 December 2025 of Línea Directa Aseguradora, S.A., Compañía de Seguros y Reaseguros (hereinafter, the Parent company) and its subsidiaries (hereinafter, the Group), which forms part of the Group's consolidated management report.

The NFIS includes information in addition to that required by current commercial regulations on non-financial information, specifically, it includes the Sustainability Information prepared by the Group for the year ended 31 December 2025 (hereinafter, the sustainability information) in accordance with the Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022, as regards corporate sustainability reporting (CSRD). This sustainability information has also been subject to limited assurance procedures.

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that:

- a) the Group's Non-Financial Information Statement for the year ended 31 December 2025 is not prepared, in all material respects, in accordance with current commercial regulations and in accordance with the selected criteria of the European Sustainability Reporting Standards (ESRS), as well as with those other criteria described as mentioned for each topic in the table of Annex III "Requirements of Law 11/2018 regarding Non-financial Information" of the aforementioned Statement;
- b) the sustainability information as a whole is not prepared, in all material respects, in accordance with the sustainability reporting framework applied by the Group and which is identified in the subsection "BP-1. General basis for preparation of the Consolidated Non-Financial Information Statement and Sustainability Information" of section 1, including:
  - That the description provided of the process for identifying the sustainability information included in the subsection "Impact, risk and opportunity management" of section 1 is consistent with the process in place and enables the identification of the material information to be disclosed in accordance with the requirements of ESRS.

- Compliance with ESRS.
- Compliance with the disclosure requirements, included in subsection “Taxonomy” of the environment section of the sustainability information with the provisions of article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investments.

## **Basis for conclusion**

We conducted our limited assurance engagement in accordance with generally accepted professional standards applicable in Spain and specifically in accordance with the guidelines contained in Guides 47 Revised and 56 Revised issued by the *Instituto de Censores Jurados de Cuentas de España* on assurance engagements regarding non-financial information and considering the contents of the note published by the Instituto de Contabilidad y Auditoría (ICAC) dated 18 December 2024 (hereinafter, generally accepted professional standards).

In a limited assurance engagement, the procedures applied are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under these standards are further described in the Practitioner's responsibilities section of our report.

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

## **Responsibilities of the Parent company's directors**

The preparation of the NFIS included in the Group's consolidated management report, as well as its content, is the responsibility of the directors of Línea Directa Aseguradora, S.A., Compañía de Seguros y Reaseguros. The NFIS has been prepared in accordance with prevailing commercial regulations and in accordance with the ESRS criteria selected, as well as those other criteria described in accordance with the aforementioned for each topic in the table of Annex III “Requirements of Law 11/2018 regarding Non-financial Information” in the aforementioned Statement.

This responsibility also encompasses designing, implementing and maintaining such internal control as is determined to be necessary to enable the preparation of the NFIS that is free from material misstatement, whether due to fraud or error.

The directors of Línea Directa Aseguradora, S.A., Compañía de Seguros y Reaseguros are also responsible for defining, implementing, adapting and maintaining the management systems from which the information necessary for the preparation of the NFIS is obtained.

With regard to the sustainability information, the Parent company's directors are responsible for developing and implementing a process to identify the information that should be included in the sustainability information in accordance with the CSRD, ESRS and as set out in article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020, and for disclosing information about this process in the sustainability information itself in subsection "Impact, risk and opportunity management" of section 1. This responsibility includes:

- understanding the context in which the Group's business activities and relationships are conducted, as well as its stakeholders, with regard to the Group's impacts on people and the environment;
- identifying the actual and potential impacts (both negative and positive), as well as the risks and opportunities that could affect, or could reasonably be expected to affect, the Group's financial position, financial results, cash flows, access to finance or cost of capital over the short, medium or long term;
- assessing the materiality of the impacts, risks and opportunities identified; and
- making assumptions and estimates that are reasonable under the circumstances.

The Parent company's directors are also responsible for the preparation of the sustainability information, which includes the information identified by the process, in accordance with the sustainability reporting framework applied, including compliance with the CSRD, compliance with ESRS and compliance with the disclosure requirements included in subsection "Taxonomy" of the environment section of the sustainability information in accordance with the provisions of article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment.

This responsibility includes:

- Designing, implementing and maintaining such internal control as the Parent company's directors consider to be relevant to enable the preparation of sustainability information that is free from material misstatement, whether due to fraud or error.
- Selecting and applying appropriate methods for the presentation of sustainability information and making assumptions and estimates that are reasonable in the circumstances about specific disclosures.

### **Inherent limitations in preparing the information**

In accordance with ESRS, the Parent company's directors are required to prepare prospective information based on assumptions and hypotheses, which should be included in the sustainability information, regarding events that could occur in the future, as well as possible future actions, where appropriate, that the Group could take. Actual results may differ significantly from estimated results since they refer to the future and future events often do not occur as expected.

In determining disclosures relating to sustainability information, the Parent company's directors interpret legal and other terms that are not clearly defined and could be interpreted differently by others, including the legality of such interpretations and, consequently, they are subject to uncertainty.

## Practitioner's responsibilities

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the NFIS and sustainability information are free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of this information.

As part of a limited assurance engagement, we exercise professional judgement and maintain professional scepticism throughout the engagement. We also:

- Design and perform procedures to assess whether the process for identifying the information included in both the NFIS and the sustainability information is consistent with the description of the process followed by the Group and enables, where appropriate, the identification of the material information to be disclosed in accordance with ESRS requirements.
- Perform risk assessment procedures, including obtaining an understanding of internal control relevant to the engagement, to identify the disclosures in respect of which material misstatements are likely to arise, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control.
- Design and perform procedures responsive to where material misstatements are likely to arise in the disclosures included in the NFIS and sustainability information. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control.

## Summary of the work performed

A limited assurance engagement involves performing procedures to obtain evidence to support our conclusions. The nature, timing and extent of procedures selected depend on professional judgement, including the identification of the disclosures where material misstatements are likely to arise, whether due to fraud or error, in the NFIS and in the sustainability information.

Our work consisted of enquiries of management as well as of various units and components of the Group that were involved in the preparation of the NFIS and sustainability information, of the review of the processes for compiling and validating the information presented in the NFIS and sustainability information and of the application of certain analytical procedures and review procedures on a sample basis, as described below:

In relation to the process of verifying the NFIS:

- Meetings with Group personnel to understand the business model, policies and management approaches applied and the main risks related thereto, and obtaining the information required for the external review.
- Analysis of the scope, relevance and completeness of the content of the NFIS for the 2025 year based on the materiality analysis performed by the Group and described in subsection "Impact, risk and opportunity management", taking into account the content required under prevailing commercial legislation.
- Analysis of the processes to compile and validate the information presented in the NFIS for the 2025 year.

- Review of information concerning risks, policies and management approaches applied in relation to material matters presented in the NFIS for the 2025 year.
- Verification, by means of sample testing, of the information relating to the content of the NFIS for the 2025 year and its adequate compilation using data obtained from the information sources.

In relation to the process of verifying the sustainability information:

- Making enquiries of the Group's personnel:
  - In order to understand the business model, policies and management approaches applied and the main risks related thereto, and obtaining the information required for the external review.
  - In order to understand the source of the information used by management (for example, engagement with stakeholders, business plans and strategy documents); and the review of the Group's internal documentation on its process.
- Obtaining, through enquiries of Group personnel, an understanding of the entity's relevant processes for collecting, validating and presenting information for the preparation of its sustainability information.
- Evaluating the consistency of the evidence obtained from our procedures on the process implemented by the Group for determining the information that should be included in the sustainability information with the description of the process included in such information, as well as the evaluation of whether the aforementioned process implemented by the Group enables the identification of material information to be disclosed according to ESRS requirements.
- Evaluating whether all the information identified in the process implemented by the Group for determining the information that should be included in the sustainability information is in fact included.
- Evaluating the consistency of the structure and presentation of the sustainability information with the requirements of ESRS and the rest of the regulatory framework on sustainability information applied by the Group.
- Making enquiries of relevant personnel and performing analytical procedures on the information disclosed in the sustainability information, considering such information in respect of which material misstatements are likely to arise, whether due to fraud or error.
- Performing, where appropriate, substantive procedures on a sample basis on the information disclosed in the selected sustainability information, considering such information in respect of which material misstatements are likely to arise, whether due to fraud or error.
- Obtaining, where applicable, the reports issued by accredited independent third parties appended to the consolidated management report in response to the requirements of European regulations and, in relation to the information to which they refer and in accordance with generally accepted professional standards, verifying only the practitioner's accreditation and that the scope of the report issued is aligned with the requirements of European regulations.

- Obtaining, where appropriate, the documents that contain the information incorporated by reference, the reports issued by auditors or practitioners on such documents and, in accordance with generally accepted professional standards, verifying only that the document to which the information incorporated by reference refers meets the conditions described in ESRS for the incorporation of information by reference in the sustainability information.
- Obtaining a representation letter from the Parent company's directors and management in relation to the NFIS and sustainability information.

## **Other information**

The Parent company's directors are responsible for the other information. The other information comprises the consolidated annual accounts and the rest of the information included in the consolidated management report, but does not include either the auditors' report on the consolidated annual accounts or the assurance reports issued by accredited independent third parties as required by European Union law on specific disclosures contained in the sustainability information and appended to the consolidated management report.

Our assurance report does not cover the other information, and we do not express any form of assurance conclusion thereon.

With regard to our assurance engagement regarding the sustainability information, our responsibility consists of reading the other information identified above and, in doing so, considering whether the other information is materially inconsistent with the sustainability information or the knowledge we have obtained during the assurance engagement, which may be indicative of the existence of material misstatements in the sustainability information.

PricewaterhouseCoopers Auditores S.L.

Original in Spanish signed by  
Enrique Anaya Rico

20 February 2026