

LÍNEA DIRECTA GROUP



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Integrity Policy

Important information about this document	
Name of Policy	Integrity Policy
Related section of Línea Directa Group's Code of Ethics	Paragraphs 7, 8 and 16
Related portions of other policies	N/A
Rules and standards superseded	2021 Anti-Corruption Policy
Rules and standards repealed	N/A
Related rules and standards	Code of Ethics
Business unit or function affected	The entire organisation
Personnel affected	The entire organisation
Main area responsible for monitoring	Ethics manager
Approved on	14 December 2023
Effective from	14 December 2023
Version	v.3
Created by	Corporate and Regulatory Governance
Approved by	Board of Directors

1. Purpose

This Policy reflects the commitment of the Línea Directa Group to zero tolerance for any form of corruption. To this end, it sets out a series of principles that establish the framework for action to ensure strict compliance with the regulations on the prevention and fight against fraud and corruption, as well as the monitoring of the highest standards of integrity in professional activity.

This Policy develops the Línea Directa Group's Code of Ethics, a document that sets out the principles, values and rules that govern the actions of all people who work for or provide their services to any of the companies that make up the Línea Directa Group, both as part of the relationships they maintain with one another and in those they maintain with third parties.

2. Scope

This Policy applies to Línea Directa Aseguradora, Compañía de Seguros y Reaseguros, S.A. (the “**Company**”) and to all companies that at any given time make up the Group, whose parent company is the Company, as well as the Línea Directa Foundation, (hereinafter, jointly “**Línea Directa Group**”).

This commitment extends to all employees, managers and members of the management bodies at Línea Directa Group companies, their families and all suppliers, collaborators and business partners with whom they interact.

The Group will promote the transfer of the principles set out in this Policy to its suppliers through the Supplier Code of Conduct, which is considered to be a mandatory document and its acceptance is an essential requirement to be able to start the engagement process with the Línea Directa Group.

The Línea Directa Group rejects all types of corruption in all its forms, both in relation to public officials and between private individuals.

For the purposes of clarification, the term "public official" includes:

- ministers, counsellors and other political officials;
- part-time government employees;
- private citizens holding public office;
- politicians or candidates for public office;
- security forces and bodies (military, police, special agents);
- judges, prosecutors, state attorneys, legislators, etc.
- directors and employees of state-owned or state-controlled enterprises (state-owned oil company, airlines, etc.);
- employees of other public institutions such as universities, hospitals, customs, inspectors, etc.

By "individuals" we mean suppliers, distributors, agents, customers and business partners.

3. Principles

The basic principles of action around which this Policy is structured are as follows:

- i. Reject all activities that are directly or indirectly related to acts of corruption, whether public or private. Zero tolerance for bribery, extortion, bribery or influence peddling.
- ii. Implement due diligence processes in the engagement of suppliers and distributors to ensure that they comply with appropriate ethical and conduct standards.
- iii. Apply the principle of lawfulness, transparency and business ethics in the activity, operations and transactions of the Línea Directa Group, as well as its faithful reflection in its books and records.
- iv. Prohibit the making of "facilitative payments", which are those that refer to payments that help facilitate or speed up certain procedures in the performance of professional tasks.
- v. Prohibit the use of funds, property, or other resources of the Group to support, contribute, finance, or donate to political parties, their representatives, candidates, or related foundations.
- vi. Establish clear internal rules in relation to the acceptance, delivery, promise or authorisation of gifts, which under no circumstances may be carried out with a view to influencing or conditioning the decision of the recipient for the benefit of the Línea Directa Group, nor may this conduct occur during a negotiation and bidding process. Likewise, the acceptance or delivery of cash is expressly prohibited.
- vii. Promote training and the Company's internal culture against corruption, as well as the use of the Whistleblowing or Ethical Channel to highlight activities contrary to the provisions of this Policy.
- viii. Prohibit any conduct that is not in line with the provisions of this Policy.

4. Communication

The Línea Directa Group has set up a confidential channel of communication to raise any questions or concerns and to report any irregularity detected, including complaints



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relating to possible breaches of this Policy, in the form of the Whistleblowing Channel, permanently available on the Company's corporate website.

The Línea Directa Group will not allow any type of retaliation against employees who report alleged breaches in good faith, and will sanction, in accordance with the regulations in force, those breaches or violations that constitute work-related misconduct, without prejudice to any other responsibilities that may arise.

The Company's Ethics Manager will be responsible for managing any concerns that may arise, as well as collecting, analysing and resolving communications received in relation to this Policy.

The Ethics Manager will periodically report to the Board of Directors on actions implemented for its dissemination and the queries or communications received as a result of possible breaches of the principles contained in the Policy.

5. Approval and review

This Policy has been approved by the Board of Directors, having been reviewed by the Audit and Compliance Committee.

The Policy will be reviewed at least once every two years, and in any case, whenever there is a regulatory change that affects it. If, as a result of the review, amendments are required, these amendments shall be submitted to the Board of Directors for approval.