



CODE OF INTEGRITY

OPERATING ETHICALLY AND IN INTEGRITY
CAP GROUP





This guide contains the general guidelines under which CAP S.A. and its operating companies (Compañía Minera del Pacífico, Compañía Siderúrgica Huachipato, CINTAC and subsidiaries in Chile and Peru, Puerto Las Losas, Tubos Argentinos, Aguas CAP and Imopac) are expected to act upon. This Code is a guide and is not intended to describe or anticipate every scenario, so it shall only guide us with examples, resources and support to our good judgment. This instrument does not authorize in any case the non-fulfillment of the legal regulations that govern our operations, nor does it alter the obligations or agreements arising from contracts or agreements of any kind already entered into.

CAP S.A.®

December 2020

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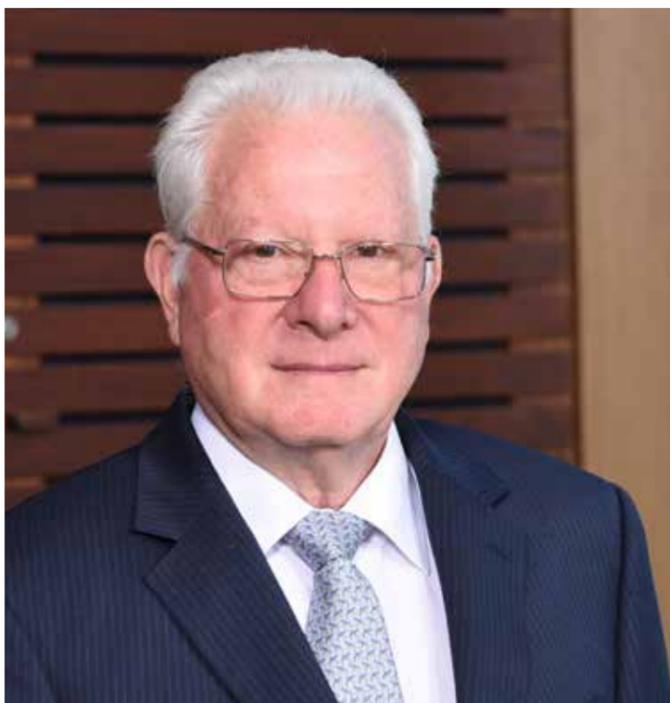
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A MESSAGE FROM THE CHAIRMAN OF THE BOARD



Throughout the history of the Company, CAP Group has built a solid reputation that makes it stand out in Chile and every country where it conducts its business. This has been based on an unrestricted commitment to ethical principles that indicate not only that we must comply with the current laws and regulations, formally but also in spirit. This primarily means the promotion of a corporate culture based on both values and policies, which provides and allows the creation of value by allowing us to understand that the way we achieve our objectives is as or even more important than the achievement thereof.

For this purpose, we have increased our efforts in the past year, in light of the latest regulatory updates on matters of criminal responsibility in Chile and the region, creating an independent Corporate Compliance Management, which shall oversee the matters of ethics and compliance which are becoming increasingly relevant not only for legal entities but also for the individuals who are part of them.

The current business world is changing very swiftly and companies like ours face greater demands and expectations from our stakeholders, not to mention the constant regulatory updates in matters of criminal liability both in Chile and globally, so we are also subjected to different laws and global standards.

Our Code of Integrity will help you make decisions in line with our corporate values. The guidelines provided in this document are binding throughout the organization, including our external stakeholders, and are not intended to cover a multitude of specific situations but rather to be a general guide. The success of this document greatly relies on each of us knowing when, how and with whom to clarify doubts or escalate potential breaches or conflicts of interest.

Our Code of Integrity further recognizes our history and the type of organizational culture we aspire to achieve, where we promote diversity and transparency, where the opinions of each of us are valued, and where our success, as well as that of the company, is achieved based on respect, collaboration and teamwork. The same is true for our customers, stakeholders and communities.

I encourage you to make this Code of Integrity a part of us and put it at the center of everything we do. We have a great responsibility towards our clients, business partners, stakeholders and each other, not only to maintain the gained trust, but to continue growing with the effort we are known for. Promoting a culture of integrity that is based on our values and the ethical principles that inspire us to generate shared and sustainable value, with no excuses.

Rodolfo Krause L.
Chairman of the Board
CAP S.A.



**OUR CODE
OF INTEGRITY**

2. OUR CODE OF INTEGRITY



2.1 WHY HAVE A CODE OF INTEGRITY?

Building strong, long-term relationships requires that all of us within the company act consciously and responsibly.

This Code of Integrity is a practical tool for our work, containing the principles and foundations with which we want to relate to our different stakeholders.

These guidelines will help guide our decisions, establishing criteria and common elements that will help us identify the best way to develop our activity and make decisions at work on a daily basis.

We are aware that this document does not cover each and every situation that may arise, but we are confident that by acting in accordance with our values and principles, we shall always have a guide allowing us to decide how to act with integrity, preferring always the

construction that guarantees the safety of our operation and the strict compliance with the legal regulations that govern our company.

The way we interact with our clients, suppliers, communities, shareholders and of course with those who work in CAP Group, gives an account of our identity as a company and the responsibility we all have in building the future.

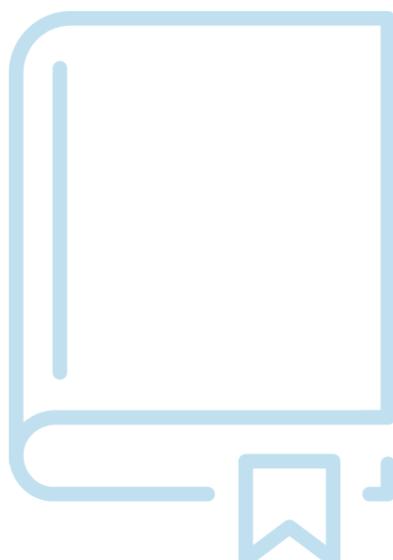
A company with values and a strong commitment to integrity is the core message of this document.



2.2 WHO DOES THIS CODE APPLY TO?

All of us working in “Group of CAP companies or CAP Group” (CAP S.A. and operating companies: Compañía Minera del Pacífico, Compañía Siderúrgica Huachipato, CINTAC and subsidiaries in Chile and Peru, Puerto Las Losas and Aguas CAP, Tubos Argentinos S.A, and Imopac), shall guide our actions based on the principles and values outlined in this document. It is our duty to be aware of these provisions and incorporate them into our work.

We extend the application of this Code of Integrity to our suppliers, contractors and business partners, always seeking to make our values and principles the seal of quality that characterizes our relationships.





OUR PRINCIPLES

3. OUR PRINCIPLES



3.1 OBJECTIVE

We are here to generate shared and sustainable value through the extraction and processing of mining resources for the development of high-quality products, goods and services for our workers, collaborators, clients, communities and shareholders.

We achieve this purpose through efficient and responsible management, promoting the sustainable use of resources and investing in technology and staff training, in order to systematically reduce the environmental impact of our activities.

We value our history and remain committed to our presence both in Chile and in all the areas where our activities are carried out.

We care about our stakeholders by establishing quality relationships and mutual cooperation with the communities in which we operate, supporting their development and incorporating their needs in our decision-making process, as well as providing optimal conditions for the development of all members of our Group, encouraging a working environment based on respect,

honesty, security, professional recognition and collaborative work.

For the proper achievement of our purpose, we strive to maintain clear and transparent communication with all our stakeholders, we take care of the occupational health and safety of our personnel, we continually comply with current legislation and beyond and, above all, we promote teamwork, diversity and inclusion, trusting that each of us will comply with the values of CAP Group as a shared commitment to always operate with the highest level of integrity and ethical behavior.



3.2 VALUES

The values of CAP Group - Sustainability, Integrity, Excellence and Innovation - are the foundation on which we build our organizational culture, shape the actions and decisions that define and represent us as individuals and professionals. They are the basic and ultimate beliefs that guide our daily actions and help us determine that which is right.



 <p>SUSTAINABILITY</p> <ul style="list-style-type: none"> • We embrace in conviction and courage that safety and health are at the core of our operations and that each person's life is of the utmost value. • Environmental sustainability concerns are an integral part of our decision making. 	 <p>INTEGRITY</p> <ul style="list-style-type: none"> • We operate in a correct and transparent way, not only complying with the law but with its spirit. • Integrity is the cornerstone of our values. 	 <p>EXCELLENCE AND INNOVATION</p> <ul style="list-style-type: none"> • Whatever we do, it is done well, innovating, in a collaborative way and committed to the business.
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**THE INTEGRITY
AND COMPLIANCE
PROGRAM OF
CAP GROUP**

4. THE INTEGRITY AND COMPLIANCE

PROGRAM OF CAP GROUPCAP

In the pursuit of creating solid and long-term relationships **in CAP Group, we promote a culture of transparency and integrity**, encouraging all our workers and contractors to actively participate in the task of safeguarding the enforcement of our values, principles and provisions contained in this guide, always inviting them to raise their hand and voice against any behavior that may jeopardize their application, having enabled several channels so that everyone can act in a timely manner, with discretion and security.

We are also committed to respecting and promoting human rights in all our operations and throughout our value chain. At CAP Group **we adhere to and embrace the principles of the United Nations Global Compact.**



- 01 We support and respect the protection of internationally recognized fundamental human rights within their scope of influence.
- 02 We actively work to ensure that our employees and suppliers are not accomplices in Human Rights violations.
- 03 We promote freedom of association and effective recognition of the right to collective bargaining.
- 04 We are committed to the elimination of all forms of forced or compulsory labor.
- 05 We strongly support the eradication of child labor.
- 06 We work to further advance the eradication of discriminatory practices in employment and occupation.
- 07 We maintain a preventive approach that favors the environment.
- 08 We encourage initiatives that promote greater environmental responsibility.
- 09 We seek innovation, development and dissemination of environmentally friendly technologies.
- 10 We actively work against corruption in all its forms, including extortion and bribery.



**PILLARS OF
OUR INTEGRITY
PROGRAM**

5. PILLARS OF OUR INTEGRITY PROGRAM



5.1 PROMOTING A CULTURE OF TRANSPARENCY AND INTEGRITY

We are confident that the culture that our company has developed over decades is one of our most valuable assets, so we are all committed to preserving and promoting an environment of open and responsible dialogue that fosters the adoption of our values and principles in all our actions.



MAKE YOURSELF HEARD: OPEN DOOR POLICY

Protecting our culture and reputation is the job of each of us in the different places or subsidiaries we find ourselves. That's why you should raise your hand if you notice or think you see any violations of this code and its values.

We encourage our employees to ask questions and seek spaces to have open conversations with their supervisors, without fear of reprisal or prejudice, about any concerns they may have regarding breaches of this code or any other that may be applicable to the company. We trust that our employees will make themselves heard when they see or hear something that does not seem right.

Any actual or prospective breach, whether of this guide, applicable policies, procedures or legal regulations that you see both internally and with respect to our suppliers, contractors, consultants, advisors, business partners, agents or others, should be reported through

institutional channels, without fear of harm, just for doing so. Remember that ignoring a signal will also make you liable whether you knew or should have known of the violation of any applicable policy, law or regulation.

Keep in mind that CAP Group employees who raise their hand when they believe a breach may have occurred are acting properly and in accordance with our corporate values. We recognize the courage required to do so and we act responsibly.

Any form of retaliation, humiliation, impairment, intimidation or threat against any person who in good faith communicates, reports or states an actual or prospective violation of this code or any other applicable policy, law or legislation is strictly prohibited.

CAP Group assures that all information shall be treated confidentially and shall only be shared with those who must be informed as part of our research protocol.



Supplementary Documentation:

Open Door Policy, Internal Complaint and Investigation Procedure.

5. PILLARS OF OUR INTEGRITY PROGRAM



5.2 RECOGNIZING OUR RESPONSIBILITY

All of us in CAP Group are guarantors of compliance with this Code of Integrity, and it is our duty to report any possible non-compliance, whether actual or apparent. We must never ignore the warning signs that may indicate improper conduct or conduct not in accordance with our values and principles, the provisions of this Guide or the law, by an employee, supplier or business partner.

Within CAP Group we are all responsible for :

- Knowing, understanding and following the standards, policies and guidelines provided by CAP Group either in this code or specific to your area.
- Clarifying with your direct supervisor whether you have questions about the application of this code, otherwise you can ask HR or Compliance.
- Raising your voice without fear of reprisal when you observe an improper action or behavior.
- Reporting in good faith any detected or suspected non-compliance with this code, policies, law or applicable regulations.
- Diligently assisting and collaborating in ethics and compliance training and initiatives.
- Protecting a healthy work environment that fosters an atmosphere of trust in which people feel comfortable to ask questions, as well as to report on integrity and expected behavior, when appropriate, without fear of reprisal.



5.3 OUR LEADERS AND HEADS OF DEPARTMENTS

All those who play leadership roles in CAP Group are especially called upon to be an example in the application of our organizational values and principles.

Leadership must be exercised with responsibility and judgment, always striving to promote a healthy and respectful work environment, rejecting any form of abuse or negligent performance.

Those in leadership positions are primarily responsible for complying with and enforcing the rules and laws governing our business, policies, regulations and procedures, and especially this Code of Integrity.

Those in management positions must be especially careful to provide complete and timely information to our corporate governance. Likewise, they shall provide maximum collaboration to the activity carried out by auditors, internal or external, and any request for information by the authority, within the scope of the appropriate functions and competencies.

5. PILLARS OF OUR INTEGRITY PROGRAM



5.4 HUMAN RIGHTS RESPECT AND PROMOTION

CAP Group is committed to respecting internationally recognized human rights in all our operations, as well as in our supply chain.

We support the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights and the core conventions of the International Labour Organization (ILO).

We are constantly working to support and enforce the aforementioned principles throughout our organization and our relationships with suppliers, contractors, business partners and the communities we interact with.

CAP Group is also committed to the implementation of programs to address potential industry non-compliance on human rights issues, to observe proper compliance in the supply chain and to monitor the potential impacts of our operations.



5. PILLARS OF OUR INTEGRITY PROGRAM



5.5 SIMPLE GUIDE TO ETHICAL DECISION-MAKING

In our daily work we will be faced with various situations and decisions that go beyond those discussed in this guide, where we still must safeguard the fulfillment of our values and principles. To this end, all employees can go to their heads of departments for guidance or contact the appropriate Compliance Officer through the channels provided. The following are some questions that will help determine the best way to proceed.

If you are uncomfortable or find it difficult to answer any of the questions in the Simple Guide, clarify your concern, involve your supervisor, your area Manager or Compliance.

01

It is illegal or goes against our principles and our code of integrity?

02

Does it go against your personal principles?

03

Does it generate any benefit for the company?

04

Who could be affected by the decision (communities, customers, suppliers, workers, others)?

05

Do you think it would have a negative impact on the reputation of CAP Group, in the press or social media?

06

If it became known that you were responsible for the decision, would you be ashamed or remorseful?

07

How do you feel about this decision, do you feel it is right? Would you do it with your own money?

08

What would others think of this decision, i.e., your friends or family?

TUPEMESA



OUR RELATIONS WITH STAKEHOLDERS

6. OUR RELATIONS WITH STAKEHOLDERS

Our history is based on the trusting relationships we have built over decades. Our job is to strengthen these relationships based on our Company values and principles which identify us. Transparent, truthful and timely communication helps us to align expectations and improve the relationship with our stakeholders.



6.1 RELATIONS WITH OUR EMPLOYEES

CAP Group is committed to mutual respect for the development of trust and collaborative work in the workplace. We promote diversity and inclusion, equal opportunities in all hiring and assume the necessary steps to ensure proper working conditions in all our operations.

Our people and equipment are the essence of our company and our main competitive advantage. Therefore, we are engaged in providing the conditions for their professional development in a safe work environment and relationships based on respect, trust and honesty.



6.1.1 OCCUPATIONAL HEALTH AND SAFETY

Safety and health of persons is the main focus of our operation. We are all responsible for protecting life and physical integrity.

At CAP Group we promote a culture of prevention and self-care, taking care of each other and putting safety and health at the top of our operations.

Workers, suppliers, contractors, and **anyone involved in our operations must comply with occupational safety and health regulations**, signage and instructions given to them, and current regulatory provisions.

We focus on working in a planned manner to detect, analyze and control process risks, thus improving our culture of operational excellence.

We ensure that the standards and requirements of occupational health and safety are incorporated into **new projects and businesses**, as well as in the purchase, design and rental of all types of equipment and facilities and/or third parties who develop any activity within our sites.

We shall not tolerate the **purchase, sale, consumption or possession of drugs or alcohol** on company premises. Likewise, we will not allow attendance at the workplace while under the influence of alcohol, drugs and/or illegal substances that diminish the ability to perform a task and jeopardize people.

We shall not carry out work for which we are not properly trained or when sub-standard conditions exist, avoiding putting our own physical integrity and that of third parties at risk.



CASE STUDY

P: My supervisor asked me to accelerate our production goal by putting off the maintenance of a key part to ensure the success of these objectives. This piece is essential to the task and is not properly maintained. What should I do?

R: I cannot and should not start a task while there are risks which are not properly controlled, i.e., if there are no safe working conditions, I do not have the right tools, I do not have the proper PPE for the task, I do not know how to do the task, there is no procedure, instruction or risk analysis regarding the task, I am not in adequate physical or psychological condition, other conditions involving uncontrolled risks. In addition, I must immediately report this to my direct supervisor or area leaders.

6. OUR RELATIONS WITH STAKEHOLDERS



6.1.2 FAIR TREATMENT

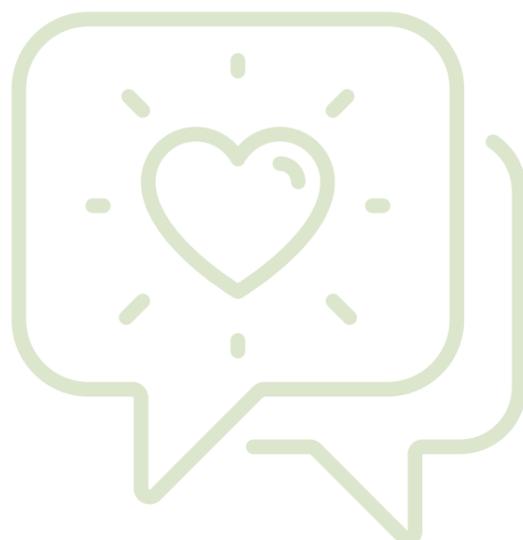
- At CAP Group all our relationships shall promote a **fair, responsible and equal treatment**.
- Under no circumstances do we tolerate **disrespectful behavior, discrimination, intimidation, harassment, mobbing, threats**, physical or verbal violence, or hostile or abusive behavior by any of our employees, contractors, suppliers, managers or directors.
- **We shall promote instances for professional and personal** development of our employees and the development of the necessary tools to promote their performance.
- **No manner of discrimination is tolerated.** It is the responsibility of everyone in the company, especially those who have leadership or leadership positions, to avoid situations of discrimination based on gender, age, race, social status or any other factor not strictly according to explicit professional criteria.
- **We are committed to carrying out fair and transparent selection processes**, seeking the most suitable individuals for each position, based mainly on experience, training and the contribution that each person can make to our company.
- **We will zealously respect the right to union association**, promoting relationships with our unions based on trust and mutual respect.
- **We respect the freedom of association** of all those who work with us to be part of any religious, political or cultural organization. Activities to be carried out in a personal capacity and outside of the working day.
- We are committed to resolve any claim or complaint related to labor issues in a **timely and respectful manner** for all our employees, within the framework of current regulations.



CASE STUDY

P: *One of my colleagues emailed a series of rude and inappropriate jokes, mentioning certain attributes of another colleague. I was uncomfortable and not sure what I should do about it.*

R: *Each one of us has the responsibility to ensure that CAP Group is a great place to work. This kind of situation is not acceptable. Talk directly to the person who sent the email, if you don't feel comfortable, talk to your supervisor, HR or directly through the Integrity Channel.*



6. OUR RELATIONS WITH STAKEHOLDERS



6.1.3 SHARED RESPONSIBILITY

As employees, we shall always seek to promote a healthy work environment, geared to productivity, always acting out of responsibility.

- **We will not use the time or resources of the company for personal activities**, always informing the direct management of any situation that may prevent us from carrying out our work properly.
- We are all responsible for promoting **respectful treatment, among all those who work and interact with the company.**
- We shall encourage proper recognition of merit and actions, with **professional performance, responsibility and integrity** as the essential focus of any evaluation.
- We shall always act with strict adherence to our ethical standards, our policies, regulations and instructions of our operation. **The duty to timely alert** any of our heads of departments about any transgression, error or opportunity for improvement that may arise **shall be a priority for all those who work in the company.**



CASE STUDY

P: *We are invited to participate in an international exhibition to showcase our new products for the coming year. The head of marketing asked me to only look for promoters who respond to certain physical characteristics for said purpose. I am not comfortable with what he is asking me. Is it okay for him to ask this of me?*

R: *No. Any request that involves discrimination on the basis of physical attributes is not appropriate. I can discuss with whomever made the request that it is against the rules of this code, if you do not feel comfortable doing so with your supervisor, with HR or directly through the Integrity Channel.*



6. OUR RELATIONS WITH STAKEHOLDERS



6.2 RELATIONS WITH OUR CUSTOMERS

Our commitment to excellence is evident in our products and services. We will always strive for the satisfaction of our customers, seeking to respond to the trust they have placed in us.

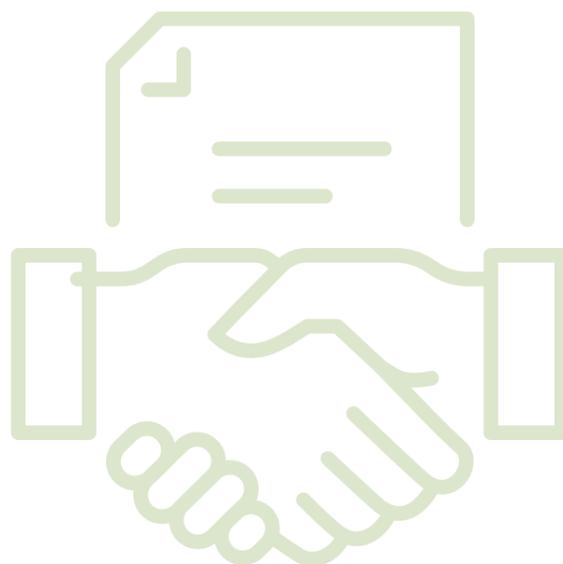
- We want to get to know our customers, their projects and needs so that we can always **offer products and services that meet their expectations.**
- We shall fulfill the requirements that make us agile and timely, **reflecting our professionalism in all our actions.**
- **We will be transparent in our business relationships,** promoting long-term alliances based on respect and trust, and strengthening competition in the markets in which we operate.
- **We shall always comply with the standards, regulations and specifications of our products,** reporting any modifications that may arise, always ensuring that quality and safety are protected.
- We shall maintain **responsible and transparent billing processes,** following our company's business practices.
- **We will zealously protect our customers' information,** using it exclusively for the purposes for which it was requested. CAP Group shall not allow the unauthorized use of the information, nor its delivery to third parties.
- We shall not give or accept gifts or other benefits from our customers that exceed the limits and criteria set forth in our guide of gifts and hospitalities. When in doubt, you should consult your direct supervisor, HR or Compliance.
- We assume that compliance with this code also implies not requesting or accepting out actions that could be contrary to the Law and/or this Code carried out by a client or third party.



CASE STUDY

P: *I work in the commercial area, the shipments to customers are delayed for reasons of operational contingency, however, I can ensure a sale with a regular customer hoping everything is resolved promptly, not indicating potential delays. Can I do this?*

R: *No, you can't. Always be transparent in business relationships and do not promise what you cannot deliver just to secure the sale. Remember that we promote long-term partnerships based on respect and trust.*



6. OUR RELATIONS WITH STAKEHOLDERS



6.3 RELATIONS WITH OUR SUPPLIERS AND BUSINESS PARTNERS

At CAP Group we are interested in generating long term relationships with our suppliers, based on responsibility, respect and mutual benefit.

- **We select our suppliers** based on the quality and suitability of their products and services, price and/or delivery conditions.
- We will not commit CAP Group in hiring a third party **which has not been duly evaluated** according to the procedures established for the purchase or contracting of goods and services. Nor will we exert undue pressure to accelerate such processes.
- **We shall promote fair competition**, without privileging, giving undue advantage or arbitrarily discriminating against any of our suppliers in the proposal selection process.
- **Special safeguards shall be taken to prevent any conflict of interest** that may arise between suppliers and workers or executives of our company. This includes, but is not limited to, refraining from partaking in and/or influencing processes or decisions in which you have a personal, material or other interest.
- We shall support our suppliers in their continuous improvement processes, reporting all incidents in a timely manner and promoting their development so that they **comply with our quality, safety and sustainability standards**.
- We shall promote those relationships that are consistent with our company's vision of sustainability, with special attention to the **social and environmental impacts our products have had on their value chain**.
- **We shall place special emphasis on the timely fulfillment of our commercial undertakings**, always seeking to respect payment dates while also being rigorous in the quality control of the products and services acquired by us.
- We expect our suppliers to commit to the company's standards and the standards of integrity set forth in this Code. To this end, **we shall encourage our suppliers become aware of the conditions and regulations under which their activities will be evaluated in a timely manner**.
- **We shall not give or accept gifts or other benefits from our suppliers and business partners**, which may affect or appear to affect the fairness and objectivity with which we select and evaluate our business relationships. However, any gift, travel or other benefit, given or received, shall be reported through the Compliance Record System.
- We believe that compliance with this code also means **not requesting or accepting** that a supplier or business partner performs actions which might be contrary to the Law and/or the values, principles and provisions of this Guide.



Supplementary Documentation:

User Guide – Due Diligence Business Partners.
User Guide – Gifts and Hospitality.
User Guide – Free Competition Guide.

6. OUR RELATIONS WITH STAKEHOLDERS



CASE STUDY

P: We are in the process of assessing a business partner for an environmental consultancy. One of the counterparties related to the third-party refuses to provide information about its owners, managing partners. My boss tells me not to ask any more questions because we have to “pull the consultancy” quickly. Is this correct?

R: During an assessment process the companies of CAP Group will require all the relevant information required to evaluate the risks of hiring a third party that could represent the company against others. It could even escalate its approval to a specific committee. Not wanting to provide information is a warning signal that cannot be ignored and must escalate to the area manager, the Supply area and Compliance. Often these signs are indicators of integrity gaps that need to be addressed.

P: A new supplier, who was recommended by another management, is interested in us agreeing on such services, but without a written agreement. What should I do?

R: Any agreements that CAP makes with third parties must be made through a standard agreement approved by Legal and Compliance Management. During the “due diligence” process, the existence and accuracy of the agreement will be a requirement, so if the counterpart does not wish to agree to such services in writing, we cannot make use of their services. Not wanting to formalize through an agreement is a warning signal that cannot be ignored and must escalate to the area manager, the Supply area and Compliance.



6. OUR RELATIONS WITH STAKEHOLDERS



6.4 RELATIONS WITH THE AUTHORITIES

At CAP Group, we respect democratic institutions and have a strong commitment to carry out our activities in strict compliance with the law.

- Sometimes we will have to make arrangements before the authorities on behalf of the company, situations in which we must comply with the provisions of our internal regulations governing the way we relate to the authorities. We will not carry out any action that could damage our self-image, always being respectful to the public authorities.
- We shall always be **transparent and honest in our relationship with the authorities**, submitting any information required in a timely manner and through the proper channels.
- With respect to our relationship with local or government authorities, parliamentarians, judicial bodies or any other public official, we shall ensure that those who interact with them are aware of the relevant restrictions and act with integrity and professionalism, in accordance with the Public Officials Relationship User Guides.
- As a company, we shall not **partake in political campaigns or finance candidates or political parties**. Those who work with us shall have the possibility to carry out these activities, outside working hours and without compromising any of the company's resources.
- Any kinship or relationship to a public official, government authority or politically exposed person must always be declared.
- Any meeting or inspection visit must be carried out with the attendance of at least two representatives of CAP Group insofar as possible. Meetings or inspections with a national or foreign public official must always be reported through the Compliance Record System.
- We shall not perform actions that may place an authority in an actual or perceived conflict of interest relationship, this includes providing gifts or other benefits.
- We will never encourage a public official to perform an unlawful action or to omit or fail to perform an action appropriate to his or her position.
- We expect everyone in the company to be aware of our internal Anti-Bribery and Anti-Corruption regulations.
- We are also committed to **implementing and strengthening efficient systems** to combat bribery.



Supplementary Documentation:

User Guide - Public Officials, Persons of Influence or Representing Others.
User Guide - Interaction with Public Officials.



CASE STUDY

P: A regional authority is my personal friend and could help us expedite the approval of a particular project for the company. Is it correct to use this contact?

R: You should never use your personal contacts with government authorities for company matters. In addition, CAP Group has formal channels to interact with the authorities as a company. In Chile, we also have a lobbying law that regulates this type of relations.

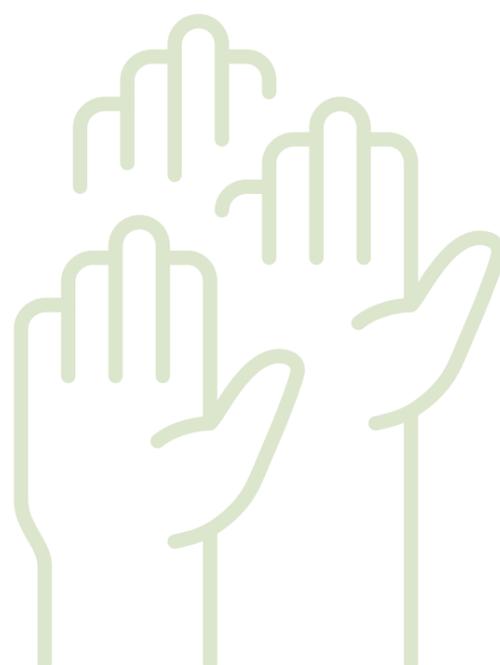
6. OUR RELATIONS WITH STAKEHOLDERS



6.5 RELATIONS WITH OUR SHAREHOLDERS

At CAP Group, we are committed to making our business profitable in the long term, so we promote the responsible use of our resources, the adoption of suitable control measures and the assurance of integrity in all our operations.

- All of us who comprise the company have a responsibility to **protect and increase the value of our shareholders' investments.**
- We shall always ensure that the **information provided to our directors is a true representation of reality**, always guaranteeing exhaustive and rigorous reports to our corporate governance bodies.
- **We shall promptly adopt the initiatives and provisions** arising from our directors and managers, proactively acting to achieve our company's objectives.



6. OUR RELATIONS WITH STAKEHOLDERS



6.6 RELATIONS WITH THE COMMUNITIES

We seek to establish meaningful and long-term relationships with the communities around us, based on trust, transparency and collaboration, always promoting respect for local cultures and active participation.

- Through our operations, we seek to contribute to the human, economic and social development of the communities we interact with.
- We wish to collaborate and communicate openly with the communities to promote transparency in our actions. It is our priority to maintain a strong commitment with the communities surrounding our operations where many of our employees and their families also live.
- We shall constantly aim to get to know the communities in which we are inserted, seeking an active participation in their development.
- All contributions to the community shall be made through formal channels and procedures provided therein. In the contribution approval, special care shall be taken to know in advance where resources will be allocated and who will be responsible for their management or administration.
- We shall always be advised by our company's expert areas in community relations.
- We shall respect the agreements reached with the communities, and it is the duty of all group collaborators to channel these agreements through formal means and to ensure that their content is thoroughly recorded.
- We are aware that new projects and businesses should incorporate the variables of community affairs, according to legal standards and those defined by the Company.
- When in doubt or if you see a breach related to gaps with communities and/or stakeholders, make yourself heard: talk to your supervisor, the area supervisor, sustainability, community affairs, external affairs or use the Integrity Channel.



CASE STUDY

P: *The president of the neighborhood association near a CAP Group operation has asked me for a contribution for scholarships to college students from the community where all their children are. What should I do?*

R: *Always pre-approve any handing over anything of value to a third party, such as the community, as it could raise the appearance of a conflict of interest, and you cannot and should not make promises or commitments that are not approved, on behalf of the company. Nor should the company undertake any relationship or development initiatives with stakeholders in the field without coordination with the community area. Similarly, it must always submit all concerns, inquiries or requests to the communities' area of operation, which shall assess the requests and address these requirements in accordance with applicable regulations.*

6. OUR RELATIONS WITH STAKEHOLDERS



6.7 RELATIONSHIP WITH THE ENVIRONMENT

We are aware of our responsibility with the environmental care and heritage we must leave to the future generations.

- **At CAP Group, we are committed to operating the business in harmony with the environment and complying with environmental standards**, for which we abide by the current regulatory framework, voluntarily signed agreements and best practices, in our current and future businesses.
- How we achieve our success is as important if not more so, therefore a sound, transparent and effective risk management process is paramount to assess our environmental impact, a process that should be applied throughout the life cycle of our operations.
- **We shall promote a culture of environmental care**, inviting our employees and all those who interact with our company to take an active leadership role in protecting natural resources. We shall foster good practices with suppliers, contractors, business partners and customers, letting them know that at CAP Group we care and constantly work to make our operations sustainable, so we encourage third parties with whom we interact in doing the same.
- We shall **encourage energy saving** and proper use of water, along with reuse and recycling in our operations.
- All of us who work in the company **have the responsibility to report** any situation or condition that could generate an environmental impact to the direct heads of departments of those responsible for environmental issues, or to the Integrity Channel.
- **We shall never overlook an incident** or operational error that may produce an actual or potential environmental impact both for ourselves and for third parties such as suppliers, contractors, business partners or customers.
- In our processes, we shall seek to carry out all necessary measures to **monitor our environmental performance, always trying to improve and be more efficient in the use of our resources and in the protection of the environment.**



CASE STUDY

P: *One of the contractors we work with has questions about waste treatment, specifically whether they are complying with the relevant regulations and tells me it prefers to leave it for later. What should I do?*

R: *You should immediately discuss this with the area supervisor, who shall discuss our expectations for environmental compliance with the contractor, in order to guide it and establish an action plan. If necessary, escalate it to the Area Manager or through the Complaint and/or Consultation Mechanisms provided by the company.*



**OUR
BUSINESS
PRACTICES**

7. OUR BUSINESS PRACTICES



7.1 WE DO NOT TOLERATE ANY FORM OF CORRUPTION

It is our policy to develop our business in an ethical and honest manner. At CAP Group, we have a zero-tolerance approach to bribery and corruption, and are committed to acting professionally, impartially and with integrity in all our activities.

- For CAP Group, **all forms of bribery, facilitation payments and corruption are strictly prohibited**, whether to public officials or in the private sector.
- The vast majority of countries have regulations that prohibit bribery and payoffs, including offshore. Violations of these laws can result not only in severe fines for the company but also in personal penalties for individuals linked to the company, such as directors, managers, employees or others.
- You should always have knowledge of the third party with whom you are doing business.
- We shall not engage in, tolerate or support **any form of corruption or improper business conduct**. This includes not offering, giving, consenting to give, promising, accepting or soliciting anything of value or improper favors, e.g., within contracting, to favor a contractor arising from this payment consented to, offered, promised, given, accepted or delivered.
- No person may abuse his or her position** within the organization to receive or give an undue advantage.
- When in doubt, these can always be clarified with the direct supervisor, with the area manager or with Compliance. We can also use the various mechanisms for integrity queries that CAP Group has at our disposal.
- Under no circumstances is it permitted to **offer gifts, hospitality or benefits, directly or indirectly, to any public official**.



CASE STUDY

P: I regularly interact with government officials as part of my responsibilities to manage permits for operations of CAP Group. One of them asks me to look for a place in the company for his son who just graduated from Mining Engineering. What should I tell him?

R: A job is considered something of value so you should decline the request, especially if you interact with the public official, who is asking you for a favor. Gently decline and direct him or her to CAP's employment website where he or she can apply like all other applicants.

7. OUR BUSINESS PRACTICES



7.2 WE AVOID ANY CONFLICT OF INTEREST

We act in a professional manner and always seek the best interests of CAP Group in the fulfillment of our duties and responsibilities, avoiding Conflicts of Interest situations and the granting or obtaining of undue benefits.

WHAT CONSTITUTES A CONFLICT OF INTEREST?

Conflicts of interest are situations of incompatibility between a private interest and the interests of the Group. Conflicts can be actual, potential, or even apparent. For instance, if we have business relationships, kinship or friendship that interfere with or could affect our judgment in decision-making in the workplace, suggesting a lack of independence or impartiality.

We recognize that a conflict of interest by itself does not necessarily represent an act of corruption or improper behavior, however, it enhances the possibility that these might occur, that improper benefits might be obtained and/or that economic or reputational damage might be generated for CAP Group. Therefore, we avoid, declare and manage situations of conflicts of interest, always in a transparent manner.

- In any decision we must make, we shall always seek to identify the interests that will be affected, prioritizing in our work **those decisions that put the company's interests first.**
- We must refrain from making any decision where there is an actual, potential or apparent conflict of interest, even if there is no statement or plan of action to address such conflict.
- Any potential, actual or apparent conflict of interest **must be declared annually.** In addition, conflicts that may subsequently arise must be reported through the Compliance Record System to the supervisor or area manager, who will be responsible for establishing an action plan and escalating to the Compliance area where appropriate pursuant to the declared conflict.
- In situations where the actions of others may create a conflict of interest, we shall **immediately alert** our direct supervisors, so that the necessary preventive measures can be taken.
- **We shall not use the resources of the Company to obtain personal benefit** or profit for another activity or business, nor shall we seek to personally benefit from any business opportunity in which CAP Group may have a stake, such as applying for discounts, receiving gifts, etc.
- We shall inform our head of department of any offer, **request or handing over of gifts, trips or other benefits,** for their proper registration. In no case will we accept or give gifts, which may affect or even appear to affect the impartiality and objectivity of our decisions.
- We are aware that **we will not always be able to avoid situations where we are faced with a conflict of interest** (i.e., family or friends entering into a business relationship with CAP Group), so we refrain from and avoid intervening in related decisions or actions, reporting immediately when a situation of potential conflict could become an actual or apparent conflict.

7. OUR BUSINESS PRACTICES

At CAP Group we avoid that our personal relationships may constitute scenarios of conflict of interest or transgression of the ethical and legal standards that govern our actions.

- Relationships between people linked by hierarchical subordination or direct dependency within the company are not permitted. Should this occur, the company will offer an alternative position to any of those involved, avoiding any kind of discrimination in the process.
- We must refrain from participating in any agreement, tender or process involving family members or persons directly related to us. Direct superiors must be immediately informed so that the necessary guarantees can be taken in a timely manner.



CASES STUDY

P: *A college classmate of mine has just founded a non-profit organization and asked me to be a member of the Board. What should I do?*

R: *There may be a conflict of interest, so you should report it to your line supervisor. Employees who wish to serve on an external company's Board must always have prior approval from their supervisor, who shall be responsible for assigning an action plan and escalating to Compliance where appropriate, based on the declared conflict. In addition, remember to refrain from any decision-making where you may have a conflict of interest, if there is no documented statement and action plan.*

P: *My husband is a partner in a tax consulting firm. Can I recommend him?*

R: *Yes, you can, as long as the conflict is previously declared to your supervisor or the area manager who will establish an action plan, such as disqualifying you from the selection process. There can never be any impression or actions that indicate any kind of preference or distinction in the selection process, which must always guarantee transparency and equal opportunities.*



Supplementary Documentation:
User Guide - Conflicts of Interest.
Conflict of Interest Policy.

7. OUR BUSINESS PRACTICES



7.3 GIFTS AND HOSPITALITIES

At CAP Group we do not ask for or accept favors, privileges or gifts from suppliers, customers, authorities or other persons related to our activities.

Always keep in mind that accepting or receiving gifts and hospitality may expose you to misuse and create conflicts of interest, whether actual or perceived. In CAP Group, we avoid conflicts of interest by prioritizing transparent and unbiased relationships.

- Apply this Code using common sense and never to guarantee inappropriate or improper gifts or hospitality that may give the appearance of an actual or perceived conflict of interest or undue advantage.
- We shall always record these situations and we can find an effective guide to make decisions in this matter in our heads of department and/or in the Compliance area.
- Always remember that our interest is that our operational and commercial decisions are based on strictly professional criteria and, therefore, are also perceived as such by those who deal with us.
- Any gift or hospitality that does not comply with our internal regulations and/or the law must be politely declined, promptly explaining our company policy on this matter. Should this be not possible for expressly qualified reasons, it must be declared in writing, to the direct supervisor, who will approve in writing and copy the Area Manager and Compliance;
- Prizes won in sweepstakes by business partners or other parties should be considered as gifts. Gifts that CAP Group may give to its direct employees are not covered by this policy.
- With respect to recreational invites or trips of any kind, made by clients or suppliers to any person working in CAP Group, they can only be accepted to the extent that the corresponding Group company bears the costs arising from it and as long as the scope indicated in the Gift & Hospitality Guide is considered.
- In the case of meals, lunches or social events not involving travel, you can always attend, taking care to maintain a strict professional role and with special attention to avoid any conflict of interest.
- Under no circumstances may gifts or benefits, even from personal resources, be made to public officials or regulatory bodies, whether national or foreign.



CASES STUDY

P: *A CAP Group supplier has invited my husband and I to a preferential box opera cycle as a gift for being a long-time customer. Can I accept it?*

R: *No. Accepting the invitation could compromise both your independence and that of the company, mainly because of its luxurious appearance and also for extending it to a family member unrelated to the company.*

P: *In my team we have been working for months with a business partner and have finally closed the project. Currently the commercial partner is in the city and he is asking if he can invite me to dinner as a sign of good business relationship.*

R: *Yes, you can. However, you should ensure that the dinner is not overly luxurious and does not affect the independence of the company and your own. You can always accept gifts and invitations that do not go beyond the usual courtesy and constitute a common business practice in the country where you are located. Consider that their frequency, cost and form should be reduced to avoid any perception of obligation for the recipient. If you do not comply with the above, you should politely refuse.*



Supplementary Documentation:
User Guide - Gifts & Hospitality.

7. OUR BUSINESS PRACTICES



7.4 WE FOSTER FREE AND FAIR COMPETITION

CAP Group believes in free and fair competition. Free competition allows us to offer our clients the best products, in the most favorable conditions.

This is why the success of our company goes hand in hand with competitive practices based on integrity, in strict compliance with the legal regulations in force in the different areas in which we operate.

- We shall always compete by respecting the market rules. We shall not use any method that prevents, restricts or hinders free competition, or constitutes acts of unfair competition.
- It is our duty to be aware of and comply with the legal standards and our free competition policies, as well as in the case of any doubt, to resort to a direct leader or the integrity line, being proactive in avoiding any conduct or action that could involve a violation of our policy or the legal regulations of our competition. We must always follow the requirements of our Free Competition Compliance program.
- We must diligently partake in all required training.
- You may not, under any circumstances, agree, discuss, coordinate or exchange information with competitors, either directly or through third parties, regarding prices, sales or purchase conditions, profitability levels, profit margins, customers, cost structure, discounts, or any other matter that may have a direct or indirect impact on the prices charged by the companies of CAP Group or its competitors.
- We shall never share or request information from our competitors, being especially careful to avoid any situation of exchange of sensitive information, even through our customers, suppliers or social instances.
- Whenever it is required to deliver information to any authority, it must be done with the prior authorization and intervention of the Company's Compliance Officer. The Compliance Officer shall be requested to assist prior to any contact or communication with competitors, especially in the execution or assessment of joint projects with them.
- We always make our decisions independently, based on economic and unbiased reasons. We do not abuse our market power, we do not exclude any agent from markets in which we participate, nor do we exploit these agents.
- We shall not engage in unfair competition practices, i.e., any act contrary to honest practices in industrial or commercial matters.
- We shall not enter into agreements with our competitors to allocate customers, territories, or markets.
- We shall never set resale prices on products purchased by our customers.



CASE STUDY

P: *You are invited to a seminar organized by the Trade Association in which you participate. During the event, several of the representatives of other competing companies begin to discuss the prices that certain customers have demanded of them. Is it okay for you to also disclose information?*

R: *No, you may not disclose such information. You must withdraw from the conversation and immediately report what happened to your supervisor and the Compliance Officer. If you have questions, always remember that you can clear them up with your direct supervisor, with the area manager, or with HR or Compliance. You can also use the several integrity inquiry mechanisms available to you from the company.*



Supplementary Documentation:

Free Competition Regulations Compliance Program.
User Guide - Free Competition.

7. OUR BUSINESS PRACTICES



7.5 GENERATION OF RELIABLE INFORMATION

All the information we generate must accurately, truthfully and honestly represent the economic nature of the transactions recorded and the actual state of the business of the Group and its companies.

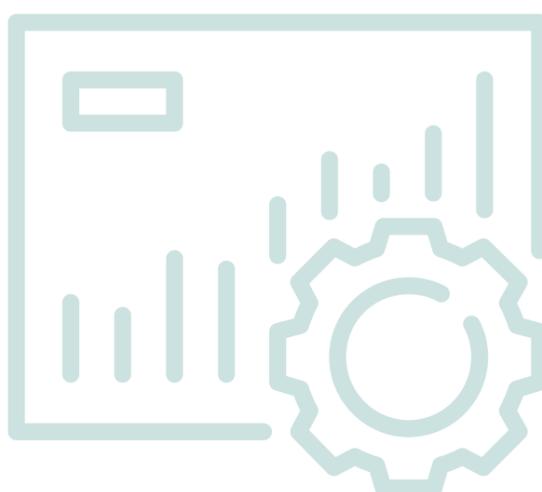
- Our stakeholders expect accuracy, integrity, timeliness, transparency and honesty in our records and reports, so all accounting and business records and information we generate must always mirror their true economic nature.
- We shall promptly record all transactions in accordance with the approval level required by our internal control standards, international financial reporting standards and the regulations issued by the various regulatory bodies.
- We shall comply with the applicable tax regulations in each of the countries where we operate, and shall provide transparent information about our business activities to the tax authorities.
- We shall make every effort to resolve all findings raised in the internal and external audit reports.
- We shall not conceal any transactions, assets, liabilities or other financial information from management.
- We shall not establish or maintain unregistered funds;
- We shall not use tax structures involving the transfer of profits to tax havens, and/or structures of an elusive nature whose sole purpose is to transfer profits to less tax-rich jurisdictions.
- We shall maintain a transfer pricing policy with related parties to be consistent with market values for transactions of a similar nature.
- No financial agreements shall be made with customers and/or suppliers that are not in accordance with corporate policies.

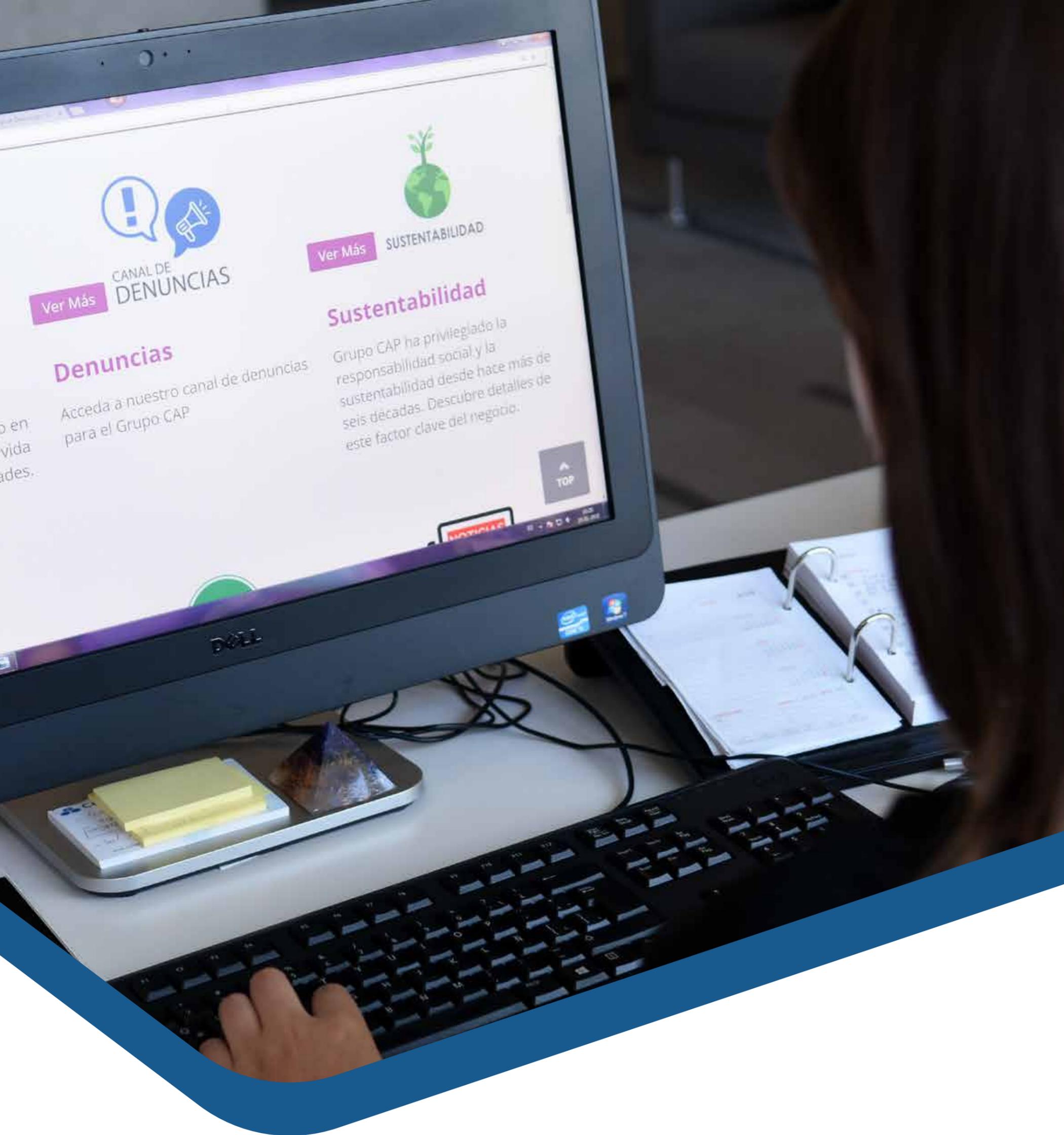


CASE STUDY

P: *I have several meal expenses to pay for repeated trips to sites. I lost my backup receipts, but I remember the exact amount to yield. Can I yield without support and group the expense without detailing the concepts?*

R: *No, you can't. If you have lost your receipts, please notify your direct supervisor in advance for approval, stating concepts, dates and amounts as accurately as possible. You should not group all expenses under one, it is important to record each expense clearly, concise and transparent.*





MANAGEMENT AND USE OF OUR INFORMATION

8. MANAGEMENT AND USE OF OUR INFORMATION



8.1 WE RESPONSIBLY MANAGE CONFIDENTIAL INFORMATION

We are zealous in safeguarding the trade information of our company, our suppliers and our customers. Any breach can be costly and affect our reputation

- All information obtained at work, which is not publicly known, **shall be treated as confidential** and shall be solely used for the purposes of our business.
- **We shall protect and maintain the confidentiality of our databases**, systems, passwords, files and data, always acting with care and responsibility to carry our information.
- **We shall ensure not to disclose our company's confidential information by any means**, whether internal or external.
- We are zealous in safeguarding the trade information of our company and our suppliers and customers, **being reserved** for those whose function or authority specifically relates to this function.
- **We shall always act with caution and responsibility** in carrying our information.
- We shall never use or disclose confidential information belonging to CAP Group.
- **We shall be particularly cautious in the use of confidential information in public places**, such as restaurants, airplanes, airports, urban transportation.
- We will use all possible tools and precautions to prevent the loss, theft or robbery of **equipment or documents**.



CASE STUDY

P: *My sister has started working as a teacher at a well-known university in the Business School. She would like to talk to me about the prospects about the prospects of the economy in the extractive industry for a class she is preparing. How much can I tell her?*

R: *Always be careful what you say, even if it is with a close relative. Consider whether the information you discuss is publicly available. If not, consider the information confidential and therefore should not be shared outside of CAP, not even with your sister.*



8. MANAGEMENT AND USE OF OUR INFORMATION



8.2 DATA PROTECTION

We are committed to respecting the right to individual privacy and taking all necessary steps to ensure the accuracy and security of data.

- All personal information collected by CAP Group in the normal course of business **shall be held in strict confidence and used solely for the purposes for which it was originally collected**, unless required by law. If for any other reason it becomes necessary to disclose third party information, this shall only be done with the prior authorization of such third parties.
- Any processing of personal data in which we are involved, i.e., data on employees, collaborators, suppliers, business partners, customers or others, **shall always comply with the regulations in force on data protection and the values of CAP Group**.
- **We shall not give out personal information** of employees or suppliers without the corresponding authorization either outside or inside CAP Group.
- We shall always consider the **applicable legal requirements** where we operate regarding the use of personal information or data.
- When exchanging information through electronic means, we shall **take appropriate safeguards** to ensure that the information is not disclosed to unauthorized persons.
- **We shall never keep personal information longer than required by law** regarding the initial purpose for which it was obtained.



CASE STUDY

P: CAP wishes to collaborate with a third party in one of the jurisdictions where we operate to process information or it may access our data from another country. Can this be done?

R: Any exchange of personal information with another company or individual, whether or not it is part of CAP Group, requires suitable provisions proving compliance with the legislation of the countries involved.



8. MANAGEMENT AND USE OF OUR INFORMATION



8.3 INSIDER TRADING POLICY

At CAP Group we protect privileged information and are committed to preventing its improper use.

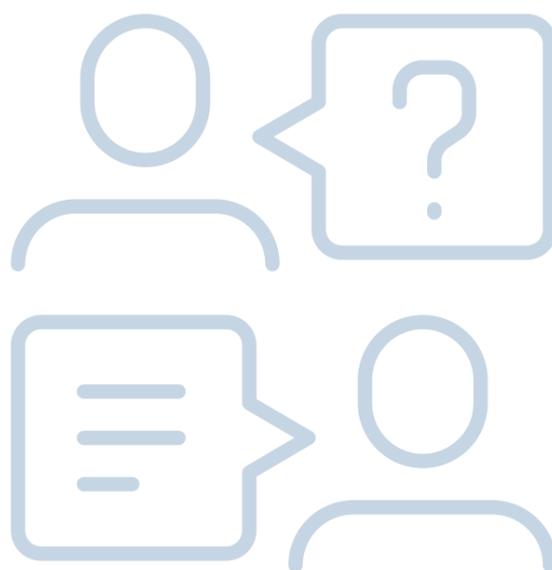
- In the ordinary course of our work there may be situations in which **we access information that is not yet in the public domain and which, if disclosed, could have financial and commercial implications** and may also affect our stakeholders.
- We shall only disclose information to those persons who, by reason of their duties in the company, are required to know it.
- **We shall not disclose information without proper prior authorization** and in accordance with the company's policies and procedures regarding insider trading. This duty includes even our family and friends.
- **We shall not conduct personal financial or business transactions using confidential information.**



CASE STUDY

P: A colleague quit and will be leaving his/her job at the end of the month. Since then, he/she has been sending out personal emails with contact information for some vendors in order to start his/her own business. Can he/she do this?

R: No, he/she can't. The supplier information he/she has obtained through his/her position in the company is confidential company information. He/she should not use it for his/her personal business.



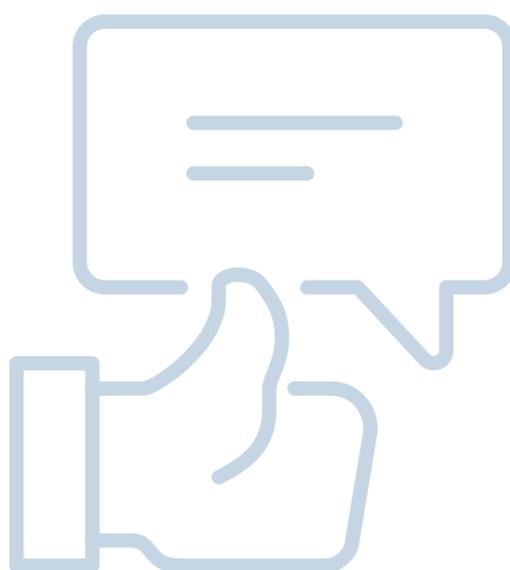
8. MANAGEMENT AND USE OF OUR INFORMATION



8.4 EXTERNAL COMMUNICATIONS

We are committed in making our communication accurate, responsible and clear, both written and verbal.

- We comply with current laws and regulations and therefore **only authorized spokespersons are allowed to publish corporate information or communicate with the media.** Such communications include interviews, presentations and articles, information on CAP Group companies' websites and other media, such as social networks and information required by law, press releases, among others.
- Any speeches or external presentations, if properly disclosed, should be recognized **as opportunities to safeguard and strengthen the company's reputation.**
- We shall be vigilant to situations which might be perceived as someone who advocates for or speaks on behalf of CAP Group.
- We shall never make any statement unless we have authorization to do so.
- **When using social media and saying something related to CAP Group, always remember that you are a representative of the company and must strive to protect its reputation.** If someone wishes to comment in a personal capacity on matters directly relevant to CAP Group, he or she should always be transparent about his or her relationship to the company, and state that the opinions expressed are his/her own and are not made on behalf of the company.
- **We shall never disclose information that may be confidential** to CAP Group without the prior approval of the Legal and External Affairs team.
- **All information disclosed by authorized spokespersons shall be accurate, reliable, transparent and timely,** having to consult the External Affairs area before issuing any communication that could affect CAP Group.
- **We shall always remain careful not to say anything that could reveal confidential information** or damage the reputation of CAP Group, even in casual external events





**OUR
ENFORCEMENT
MODEL TOOLS**

9. OUR ENFORCEMENT MODEL TOOLS



9.1 CRIME PREVENTION MODEL

The company has a Crime Prevention Model that seeks to prevent the practice of illegal activities in our work and, especially, to prevent risk situations associated with Law No. 20.393, which establishes the Criminal Liability of Legal Entities.

Companies are prosecuted by the Public Prosecutor's Office, and convicted by the Criminal Courts. Offences that may involve criminal liability of legal entities are those contemplated in Article 1 of Law 20.393, namely:

- Money laundering;
- Financing of terrorism;
- Bribery of national or foreign public officials;
- Receiving stolen goods;
- Incompatible negotiation;
- Disloyal administration;
- Bribery among private parties;
- Misappropriation;
- Damage to existing hydrobiological resources in the sea, rivers, lakes or any other water body, as a consequence of their contamination.
- Exploitation of hydrobiological resources in closure seasons.
- Illegal extraction and exploitation of benthic resources;
- Illegal processing, elaboration or storage of overexploited hydrobiological resources or products derived therefrom, and;
- Non-observance of measures issued by health authorities in the event of an epidemic or pandemic

CAP Group has channels for employees, collaborators, contractors or subcontractors, customers, suppliers, shareholders, or any other person, to make complaints, directly or anonymously, related to activities that violate the provisions of Law No. 20.393, on Criminal Liability of Legal Entities.

- All those working with us, either directly, as contractors or suppliers, **must know and comply with the rules of our Model.**
- We shall be actively seeking to identify those issues in which our company, or those working in it, are exposed to the involvement of the perpetration of a crime.
- **We shall promote training and education instances** which help us to strengthen our preventive role.
- When we find ourselves in an actual or potentially dangerous situation, **we shall immediately report it to the Crime Prevention Officer**, either directly or through the Integrity Channel established by our company.

9. OUR ENFORCEMENT MODEL TOOLS



9.2 COMPLAINT OR INQUIRY MECHANISMS

The company provides channels for complaints or queries available to all its employees, collaborators, suppliers, business partners, customers and interested third parties so that they can make complaints, queries, suggestions, possible violations of the Code of Integrity, policies, procedures and/or applicable regulations.

The available means are:

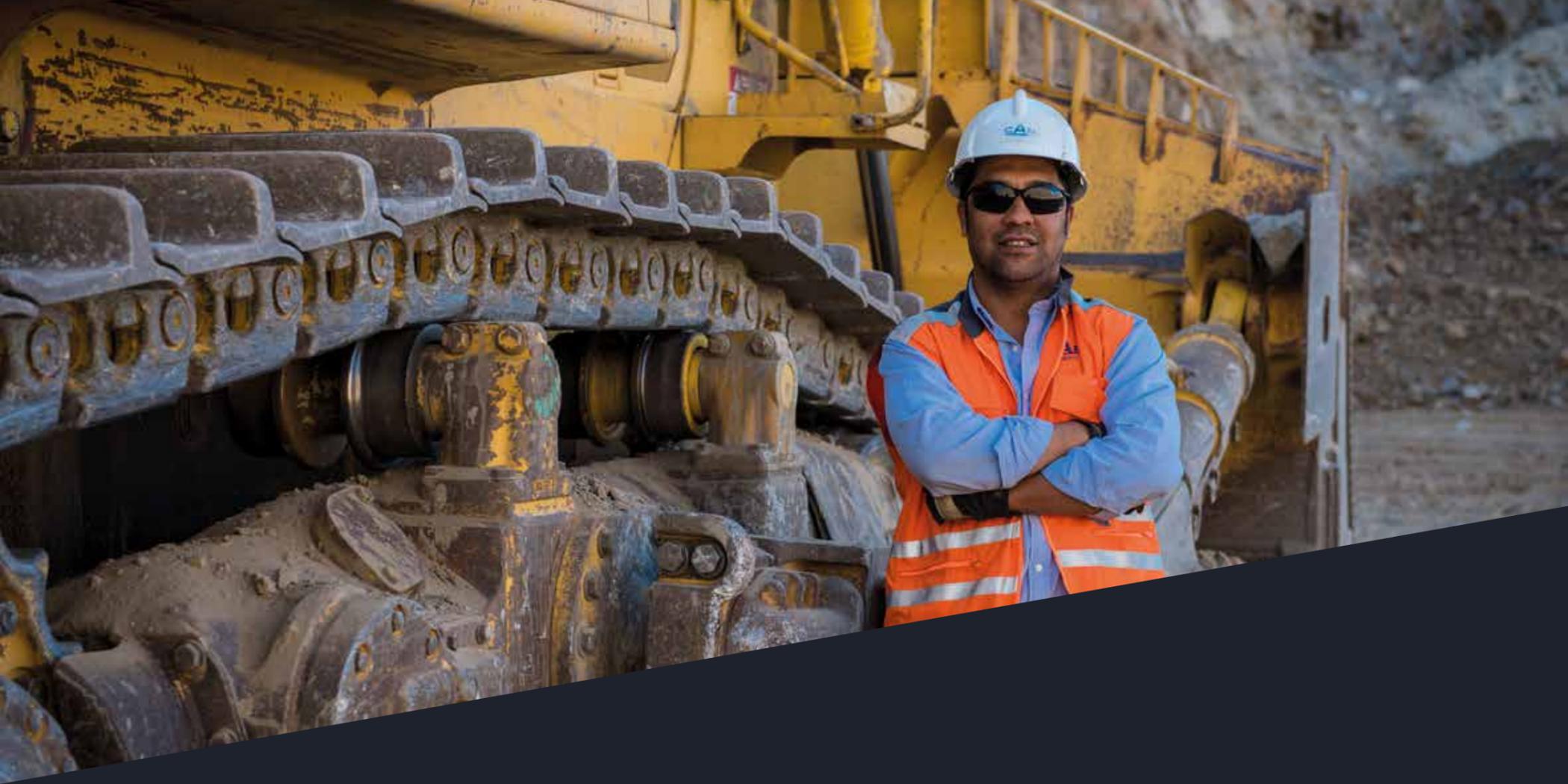
Integrity Channel, which can be accessed both through the corporate website and the Internet:
<https://grupocap.ines.cl/grupocap/formulario/>

Authorized email for direct reporting to the following address:
canaldeintegridad@cap.cl

Remember, you can ALWAYS discuss, talk or raise your concerns directly with your supervisor, area manager, compliance or HR contact.

Supplementary Documentation:
 Crime Prevention Manual for CAP Group Companies.
 Crime Prevention Handbook Flyer.





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