

# CUSTOMER RIGHTS PROTECTION POLICY



FALABELLA



 SODIMAC

 Banco  
Falabella

 TOTTUS

 mallplaza

Falabella  
INMOBILIARIO

 INIO

[falabella.com](https://www.falabella.com)

# INDEX.

**pag 3. Introduction.**

**pag 4. Purpose.**

**Scope.**

**Definitions.**

**pag 5. Principles.**

- Respect for the Law and Contracts
- Customer Security
- Respect for Competition
- Respect for the Dignity of People
- No Discrimination
- Respect for Authority
- Response to Customers
- Advertising

**pag 7. Priority Areas.**

**pag 8. Customer Rights  
Protection Program.**

**pag 9. Compliance and Support Areas.**

**pag 10. Review and Adjustments.**

**pag 11. Training and Diffusion.**

**pag 12. Related Documents.**

**pag 13. Annex.**





# 01 INTRODUCTION.

**The relationship with the Customer is not exhausted when the sale of the good or service in question takes place**, but rather entails a series of activities that range from Advertising to post-sale. For its part, Falabella's value proposal is based on Customer satisfaction and their preference for the products and services it sells, so their protection and care are unavoidable priorities for the Company.

It is for the foregoing that all Falabella's Sales Activities must be carried out in compliance with and respecting the principles established in this policy.



## 02 PURPOSE.

The purpose of this Policy is to establish the **principles which must regulate Falabella's Sales Activities for the protection of the Customer's rights.**

## 03 SCOPE.

This policy has a specific scope, so it is applicable to any Company and must be implemented and compliance required of all its Collaborators.

## 04 DEFINITIONS.

The terms used in this policy written with a capital letter are defined in Annex No. 1.

# 05 PRINCIPLES.

Falabella must carry out their Sales Activities in compliance with the following principles:

**1**

## RESPECT FOR THE LAW AND CONTRACTS

All Sales Activity must be carried out in strict compliance with the law and the internal regulations of the Company

The Company must ensure the exact, complete and timely fulfillment of the obligations that may arise from the Sales Activities with the Customers.

The Company must fully comply with all contracts entered into with its Customers, as well as, respecting the terms and conditions offered in the Advertising of its goods and services.

**2**

## CUSTOMER SECURITY

The Company must have all the means that are reasonably available to guarantee the safety of the Customer, both in their shopping experience and in the use of the purchased product or service, including the protection of health and the environment.

**3**

## RESPECT FOR COMPETITION

All Sales Activities must be carried out respecting Falabella's competitors and their products or services, and the use of advertising or other resources that may denigrate or belittle a competitor is prohibited. The foregoing does not prevent comparative advertising where permitted by law, strictly adhering to it.

#### 4 RESPECT FOR THE DIGNITY OF PEOPLE

All Sales Activity must always respect people's dignity, avoiding ridicule, caricature, stereotype, offend or belittle to them. Likewise, any institution, entity or group of people who share recognizable characteristics, ideas or beliefs must be respected.

#### 5 NO DISCRIMINATION

Falabella's Sales Activities must be carried out avoiding any form of arbitrary discrimination towards Customers, whether for reasons of age, marital status, illness or disability, religion or belief, nationality, socioeconomic status, ideology or political opinion, ethnicity or origin, sex, sexual orientation or gender identity.

#### 6 RESPECT FOR AUTHORITY

The Company must comply with the legally binding instructions given by the competent authority regarding the protection of Customer's rights. Likewise, it must respond in a complete and timely manner to the information requirements legitimately emanating from it in its field of competence. Additionally, when a control or inspection visit of the competent authority is carried out, in the exercise of their functions and within the framework of their powers, the Company must grant the necessary facilities for the review to be carried out and may not unduly refuse to provide the information required on the aspects that are subject of the inspection. To this end, the Procedure for Addressing Controls and Inspection Visits of the Authority must be taken into consideration.

#### 7 RESPONSE TO CUSTOMERS

The Company must respond to the requests, information requirements and claims of its Customers, as quickly as possible within the deadlines established by law and, when appropriate, according to the provisions of its internal regulations.

#### 8 ADVERTISING

The Advertising of each Company must be carried out in compliance with the provisions contained in the Policy and Procedure for the Preparation of Advertising and Promotional Material of Falabella.

# 06

## PRIORITY AREAS.

In its concern for the protection of the rights of its Customers, the Company has recognized the activities most exposed to potential risks of non-compliance or violations of the Consumer Law. Said activities are the following:

- 1 Fulfillment of contracts entered into with Customers;
- 2 Warranty requirements by Customers;
- 3 Management and response to Customer complaints;
- 4 Advertising, Discount sales, promotions and contests;
- 5 Customer security;
- 6 Inspections of the authority, both in stores and in Company offices; and
- 7 Arbitrary discrimination against Customers.

The Company will adopt the action plans it deems necessary to control and mitigate the risks related to the above-mentioned activities.





# 07

## CUSTOMER RIGHTS PROTECTION PROGRAM.

The Company has developed the Customer Rights Protection Program, the purpose of which is to establish a set of systems to manage the risks of regulatory non-compliance related to Customer rights protection legislation.

Within the framework of the Program, the Company will designate a Collaborator as compliance officer, who will oversee its effectiveness and correct implementation.





# 08 COMPLIANCE AND SUPPORT AREAS.

The Company's Customer Service Management, or the area that performs said function, will be in charge of: i) ensuring the correct and timely application of this Policy; and, ii) adopting the measures it deems pertinent in order to inform the principles contained in this Policy to third parties who, by virtue of a commercial or contractual relationship, are related to the Company's Customers and/or who participate in the process of preparing advertising and promotional material for the Company.

To carry out the foregoing, the Company's Customer Service Management, or the area that performs said function, will have support from the areas indicated below: i) Customer Attention Service Management; ii) Call-Center and Backoffice Executives of Customer Service; iii) Marketing Management; iv) Administration and Finance Management; v) Operations Management; vi) Line Managers; vii) Security and Loss Prevention Management; viii) Business Intelligence; ix) Store Managers and Leadership; and, x) Office Administrators.



# 09

## REVIEW AND ADJUSTMENTS.

To continuously improve and update the content and scope of this Policy, its associated procedures and the risks related to compliance with the Consumer Law, must be reviewed annually, as well as when the applicable regulations are modified.

# 10 TRAINING AND DIFFUSION.

To announce the importance of this Policy and promote its compliance, the Company will carry out, among others, the following activities: i) periodic training; ii) communication plans; and iii) test of controls regarding the risks detected of non-compliance with the Consumer Law. Likewise, in the induction processes of new Collaborators the Company will announce this Policy and any other internal regulations regarding the protection of the Customer's rights.





# 11 RELATED DOCUMENTS.

- Integrity Code.
- Conflict of Interest Policy.
- Customer Rights Protection Program.
- Policies and Procedures that are part of the Customer Rights Protection Program.

# ANNEX

## DEFINITIONS

The words and terms defined below, when written with an initial capital letter, as done in their respective definitions below, whether or not they are necessary under correct orthographic rules, and regardless of wherein this Policy they are used, or if they are used in a person, number, mode, tense or grammatical variable, as necessary for its proper understanding, will have the meanings that each of said words or terms are ascribed below:

### SALES ACTIVITIES

Means the activities: i) Advertising; ii) promotion, that is, the offering to the public of goods and services under more favorable conditions than usual, with the exception of those that consist of a simple price reduction; iii) discount sale, that is, the offering to the public of goods or services at temporarily reduced prices, in relation to the usual prices of the respective setting; iv) sale or service, in return for payment, of goods or services to a Customer, by any Company, either in person or remotely; and, v) post-sale, that is, those that derive from the purchase of a good or service by a Customer and that include, especially: a) the delivery of products; b) requests for changes and returns; c) warranty and technical service requirements; and, d) the response to claims, their follow-up and execution of the respective solutions delivered, if applicable.

### COLLABORATOR

Means: i) all and any person linked to a Company by an employment contract; and ii) all members of the board of directors, administration board or any other collegiate administrative body, which according to the applicable law or its internal organization, corresponds to the Company.

### COMPAÑÍA

Means that Falabella company whereof what is said in this document can be established for a specific case.

### CUSTOMER

Means the natural or legal persons who, by virtue of any onerous legal act, acquire, use, or enjoy, as final recipients, goods or services.

### FALABELLA

Means: i) Falabella S.A.; ii) any other legal person, in any jurisdiction, in which Falabella S.A. controls directly or through another natural or legal person more than 50% of its equity with voting rights or of the equity, if it is not a joint-stock company, or may elect or appoint or direct the election or appointment of the majority of its directors, advisers or administrators; and, iii) any other legal person, in any jurisdiction, in which Falabella S.A. is the owner, directly or through another natural or legal person, of 50% or less of its equity with voting rights or of the equity, provided that the former is notable before the public as a business with trademarks of Falabella S.A., or of any Falabella company described in number ii) immediately preceding.

# ANNEX

## DEFINITIONS

### **CONSUMER LAW**

Means any law, or any other legal norm of rank other than that of a law, which establishes and regulates the rights of the Customers 1.

### **CUSTOMER RIGHTS PROTECTION PROGRAM OR PROGRAM**

Means the organizational system defined to manage the risks of regulatory non-compliance, related to the legislation for the protection of Consumers' rights.

### **ADVERTISING**

Means the message that a Company sends to the public to inform it and motivate it to acquire or contract a good or service.

**Classification**  
Internal Use

**Approval date**  
31/01/19

**Policy number**  
13

**Responsible**  
Corporate Management of  
Operational Legal Affairs  
Falabella S.A.

**Reviewers**  
Governance  
Management Falabella  
S.A.

**Approver**  
Operational Legal  
Affairs Manager  
Falabella S.A.

## CUSTOMER RIGHTS PROTECTION POLICY

F A L A B E L L A

● ● ● ●

