



## INTEGRITY CODE

Version approved by the Board of Falabella S.A. in June 2025

## **INTEGRITY ABOVE ALL!**

At Falabella, we work toward a common Purpose: making life simpler and more enjoyable. To achieve it, our actions must respond to a framework of Integrity, which means always seeking and doing the right thing. We want to be an example of how to act, how to do business, and how to make decisions in an ethical and upright way.

Regardless of your role or the area in which you work, being part of the Falabella team means acting inspired by the value "**We Protect the Future**". This implies being aware of the impact we generate with our actions and decisions; it means that we must be coherent, consistent, and, above all, respectful of our environment and of people, always keeping the customer at the centre.

Through the actions of everyone who is part of Falabella, we collectively build our Company's reputation together; we rely on you to continue making history as a sustainable and ethical company.

**Enrique Ostalé Cambiaso**  
Chair of the Board of Falabella S.A.

# I. INTRODUCTION

## Why an Integrity Code?

Today many companies have an Integrity Code, and companies like ours—in size, presence, and complexity—have always had one. Have you ever wondered why? We have. And these are the reasons:

Because it is a very good way to make sure we live our values as a company, and because it is important that we all have clarity about the behavior expected of us. Our ethics must be clear, and this Code helps to ensure that.

Because in order to do the right thing, you have to know what the right thing is, and sometimes the difference is hard to see. This Code and the mechanisms it establishes are tools to help us. Doing the right thing sometimes requires courage, and if we put this in writing and communicate it clearly, you know that we are all behind it; that we are all committed together to doing what is right and that no one, absolutely no one in the Company, can ask you to break this ethical commitment.

To demonstrate our integrity, which speaks of what we do, of who we are, and of what we project, even when no one is watching.

## To whom does the Integrity Code apply?

This Code applies to all of us as Employees, regardless of the activities and responsibilities we have. This includes all employees, executives, and directors. Additionally, the Company seeks and promotes that its suppliers and third parties in general act in accordance with this Code.

## What are our main ethical responsibilities?

- Always comply with the law, this Integrity Code, and the Company's internal rules.
- Lead with integrity and always by example. Take care that your actions are ethical and consistent with your words.
- Maintain a healthy work environment that encourages upright behavior and a climate of trust in which people feel comfortable asking questions and reporting ethical concerns, without fear of retaliation.
- Ask before acting whenever you have a doubt, report what is wrong, and cooperate with the Company's investigations.

If you have any doubts, you may always turn to the Integrity Counselors, the Ethics Officer, the Legal Affairs and Governance Department, or the Ethics Department.

### ***Practical examples***

*My manager asks me to omit certain information in reports to the authorities because it could seriously affect the Company's reputation.*

*What should I do?*

This instruction is not only contrary to our Integrity Code but could also be illegal.

If you do not feel confident enough to tell your manager directly that this is wrong, you can turn to the Integrity Counselor, the Ethics Officer, the Ethics Manager, or report it through any of the channels of the Company's Integrity Channel. If you prefer, your report can also be anonymous.

### **Exceptions**

Notwithstanding that this Code applies to all of us, in very exceptional cases a waiver of its application may be requested, provided that this does not compromise our integrity. Requests must be sent in writing to the Ethics Department in advance of the conduct for which approval is sought. Likewise, the Ethics Department will respond to the requester in writing.

## **II. FALABELLA S.A. PRINCIPLES**

This Code is built upon our Purpose and our Values. **If we orient our decisions toward fulfilling the Company's Purpose and act by putting its Values into practice, we strengthen corporate integrity.**

Our Purpose is to work every day to Simplify and Enjoy Life More.

And we live our Purpose by always acting in accordance with our values, which are: We Are One Team, We Move with Agility, We Are Passionate About the Customer, and We Care for the Future.

## **III. ORGANIZATIONAL STRUCTURE OF INTEGRITY**

To ensure that our commitment to ethics works, the Company has created an organizational structure that allows us to properly disseminate our values, educate Employees and third parties with whom the Company interacts, and professionally manage all inquiries and reports received.

### **Ethics Department**

This is the area in charge of ensuring the proper functioning of our Ethics Program and faithful compliance with the Integrity Code, managing inquiries, reports, and investigations in a professional and confidential manner. In addition, it develops training and outreach campaigns aimed at guiding Employees on our ethics.

### **Integrity Counselors**

These are Employees who have received special training and are therefore qualified to advise us on integrity matters, clarifying doubts and concerns and confidentially channeling any reports brought to them. You can find out who they are on the intranet.

### **Ethics Officer**

Each Company shall designate an Employee to act as Ethics Officer, who shall have the function and responsibility of serving as the liaison with the Ethics Department in each Company.

## **IV. INTEGRITY CHANNEL**

It is possible that, when making a decision, ethical doubts may arise and it may be necessary to consult before acting. On other occasions we may have doubts about the integrity of other Employees' conduct, or may have become aware that a crime or some illegal act has been committed within the Company.

This information is highly relevant for the Company, in order to properly guide the conduct of its Employees or sanction those behaviors that infringe the law, our internal rules, or the Integrity Code.

The Company makes available to us the following means through which we can directly contact the Ethics Department:

- Access button to the "Integrity Channel" link on the Company's intranet and website.
- Toll-free phone number 800 726 100.
- Email [contactochile@gerenciadeetica.com](mailto:contactochile@gerenciadeetica.com)
- In person at the offices of the Ethics Department or the Ethics Officer.

It is important to emphasize that any information received by the Company through the various channels of the Integrity Channel will be treated as strictly confidential, safeguarding the identity of the reporter, the reported party, and all persons participating in an investigation, as well as any data related to it. It is also the duty of everyone who becomes aware of an ethical case to maintain the utmost confidentiality.

Likewise, an Employee or a third party may, with appropriate seriousness and responsibility, file a report anonymously.

We believe in the value of truth and respect, and therefore we must use the Integrity Channel responsibly.

## **V. METHODS AND GUARANTEES FOR COMMUNICATING ETHICAL CONCERNS**

### **Questions**

The Company is interested in all Employees understanding this Integrity Code very well. That is why we have specialists to resolve any doubts or concerns. All inquiries are important, and for that reason they will be handled in a professional, prompt, and confidential manner.

Questions, doubts, or concerns may be raised directly with the Integrity Counselor, the Ethics Officer, or the Ethics Department, using any of the Integrity Channel's contact means (phone 800 726 100; email [contactochile@gerenciadeetica.com](mailto:contactochile@gerenciadeetica.com); access button to the "Integrity Channel" link on the Company's intranet and website) or by going to their offices in person.

### **Reports**

Corporate integrity is built by all of us, every day. That is why your contribution is vital, not only through your ethical conduct but also by reporting situations that depart from expected behavior.

If you become aware of or witness a breach of the Integrity Code, the Company expects you to report it so that the situation can be investigated and the necessary measures can be taken. Every report will be handled by the Ethics Department and investigated confidentially, protecting the identity of the reporter, of those who provide testimony in an investigation, and any data related to the investigation.

Remember, each of us is called to help with this. Failing to report a breach of the Integrity Code can be as harmful as the breach itself. Hence the importance of using the various Integrity Channel contact means to provide this type of information. Do not refrain from asking or reporting thinking that someone else will do it. If you see something wrong, report it.

## **No Retaliation**

It is extremely important for the Company to receive all ethical concerns that Employees may have, so that their doubts can be addressed. For Employees to come forward freely, it is essential to have an environment in which everyone feels confident raising their concerns without fear of harm or retaliation.

Retaliation is understood to mean any conduct that negatively affects or harms an Employee as a result of having raised, in good faith, a concern or report, or having cooperated in an ethical investigation.

Retaliation against Employees who raise ethical concerns will never be tolerated and will be considered a serious breach of the Integrity Code. Therefore, once retaliatory conduct has been verified, measures will be taken against the Employee who carried it out.

That said, the Company expects Employees to act in good faith, that is, with a genuine and honest conviction about what they are raising, even if it is later determined that there was an error. By contrast, if an Employee knowingly makes a false report, the Company may take action against that Employee.

If an Employee believes that they have suffered retaliation, they must immediately report this to the Ethics Department through the channels that the Company makes available to them.

### ***Practical examples***

*A few months ago I participated as a witness in an ethical investigation, and since then my manager has excluded me from certain meetings and no longer provides me, as he did before, with information necessary for my work.*

*Could this be retaliation?*

Yes. A negative and unjustified change in treatment or in the way of working could be considered retaliation. If your manager changed his treatment toward you after you gave your testimony as a witness, you must report it to the Ethics Department.

## **VI. HOW TO ACT WITH INTEGRITY IN OUR WORKPLACE?**

### **Respecting People**

Respect for the dignity of each of our Employees is fundamental to the construction of corporate integrity, and that is why the Company commits to always protect it.

Any violation of the dignity of its Employees or of third parties with whom the Company interacts will be duly sanctioned.

The Company seeks to promote diversity among its Employees and therefore expects relationships among them to be based on respect and inclusion.

#### **In particular, the Company commits to:**

- Respect all people regardless of their ideological and philosophical positions, political ideas, religious beliefs, sexual orientation, race, nationality, ethnicity, or origin.
- Promote diversity and inclusion as a source of mutual enrichment among Employees. Therefore, no form of arbitrary discrimination or harassment will be tolerated.
- Protect the person, health, and dignity of all those with whom it interacts. Likewise, prohibit the use of child labor and forced labor.
- Train Employees so that they can continue their personal and professional development.
- Protect the identity of Employees who raise questions or file reports.
- Ensure that Employees who raise questions or file reports in good faith will not suffer retaliation.

### **Maintaining Good Relationships with Our Customers**

All Employees of this Company owe a duty to our customers, and that is why we commit to providing them with professional and honest service.

In this way, customers will receive respectful and non-discriminatory attention, and truthful, complete, and adequate information according to their requirements.

#### ***Practical examples***

*I witnessed an Employee lie during a due diligence process that was being carried out at the Company.*

*Is this conduct correct?*

No. The Company's commitment is always to provide truthful information, even when this means not closing a particular deal.

### **Maintaining Good Relationships Among Employees**

We are responsible for creating a work environment of mutual respect and trust.

As Employees, we commit to acting without putting at risk or affecting the health, safety, dignity, integrity, or reputation of the people who are part of this organization.

Likewise, we relate to each other with honesty, respect, and kindness.

For this reason, the following are strictly prohibited within the Company: abuse of authority, sexual and workplace harassment, psychological bullying, arbitrary discrimination, contemptuous or humiliating treatment, as well as any other action that negatively affects us.

### ***Practical examples***

*One of my coworkers uses bad language, refers to others in an offensive manner, and tells obscene jokes in work meetings. I have already told him personally that this situation makes me uncomfortable, but he continues with the same attitude, which affects me at work. He says that, since people in our country speak that way, he can also do so at work and that the problem is mine because I am too sensitive.*

*What should I do in this situation?*

This type of conduct is inappropriate and goes against the respect we owe each other. Approach the Integrity Counselor, the Ethics Officer, or the Ethics Department and raise the matter. You may also file a report through any of the means of the Integrity Channel that the Company makes available to you.

### **Declaring and Managing Our Conflicts of Interest**

As Employees, we have the responsibility and obligation to make decisions and act based on the best interest of the Company. Therefore, we must avoid any situation in which our personal interests are, or appear to be, in conflict with the interests of the Company.

A conflict of interest exists when, in making a decision on behalf of the Company, the objectivity of the Employee is affected by the possibility of obtaining a personal benefit or a benefit for a third party.

Sometimes conflicts of interest are real and sometimes they are apparent. But the fact that they are apparent does not mean that they cannot be serious, because your reputation and our reputation could be affected.

Situations giving rise to conflicts of interest may arise in various ways and may not, in themselves, be negative or wrong. The best way to prevent such situations from generating a conflict between the Employee's interests and those of the Company is to communicate them in a timely manner. In general terms, any financial interest, personal or commercial relationship with other workers, customers, suppliers, and/or competitors, as well as outside employment and any other activity, association, or relationship with other persons that may give rise to a conflict of interest must be disclosed.

For greater clarity and practical criteria, our Company has a Conflict of Interest Management Policy. There you will find detailed information about the types of conflicts that may arise, the responsibility of Employees, and how to manage them.

If you have any doubts, consult directly with your direct supervisor or with the Ethics Department, who will be able to guide you.

***Practical examples***

*1. I am in a romantic relationship with a coworker whom I indirectly supervise.*

*Is this a conflict of interest?*

Yes, a conflict of interest exists when you are the direct or indirect supervisor of someone with whom you have a romantic relationship. You may be acting correctly, but your relationship could be perceived as a factor that influences your judgment, so you must disclose it so that the Company may take appropriate measures and manage this conflict.

*2. I would like to form a company and partner for that purpose with one of my subordinates. This company will never have a commercial relationship with the Company.*

*May I do this?*

No, this constitutes a conflict of interest. Your objectivity and judgment in decisions regarding your subordinate may be affected by being his/her partner.

**Complying with the Law and Internal Rules on the Use of Alcohol and Drugs**

The safety of our Employees and customers is one of the main responsibilities and concerns of our Company.

The consumption of illicit drugs and the improper use of pharmaceuticals and alcohol may impair this level of safety and, at the same time, have harmful consequences for people. Likewise, the sale and distribution of illicit drugs constitutes a crime. For these reasons, our Company strictly prohibits the possession, distribution, sale, and consumption of illicit drugs and/or alcohol at work.

On occasion, due to an illness or health condition, a doctor may have prescribed medication for you that, although legal and prescribed by the doctor, may alter some of the faculties necessary to perform your job, such as your ability to concentrate or your reflexes. If that happens, it is important that you discuss with your doctor whether this could pose a risk to you, your coworkers, customers, or the Company's assets, and seek advice and instructions accordingly.

Smoking is not permitted on Company premises, except in those areas established in accordance with the law.

***Practical examples***

*I personally witnessed one of our coworkers consuming drugs in one of the Company's restrooms.*

*What should I do?*

Hopefully you can find a way to help your coworker. If you have a trusting relationship with him, perhaps you can recommend he begin a rehabilitation program. But even so, and under any circumstance, approach the Integrity Counselor or the Ethics Officer and raise this matter so that

appropriate measures can be taken, or file a report. This is the best way to help him and to look after the safety of everyone who works with him. Reporting this situation is not an act of disloyalty toward your coworker; rather, it is an act of loyalty toward all of your other coworkers and toward the Company, because a person under the effects of illicit drugs at work is a danger to everyone.

### **Rejecting All Forms of Harassment, Workplace Violence, and Discrimination**

One of the fundamental values of our Company is respect for the person. All conducts of sexual and workplace harassment, and all acts of discrimination, are serious violations of this Code.

Likewise, the Company values and protects diversity and does not tolerate any act of workplace violence, nor any conduct that seeks to nullify or alter equal opportunities or treatment at work. The Company will seek to identify and correct any conduct that goes against this value in a timely and appropriate manner, but the responsibility to maintain a work environment free from discrimination—among ourselves, with our customers, suppliers, and third parties in general—belongs to all of us.

### **Maintaining Good Relationships with Suppliers and Third Parties**

In our relationships with suppliers and third parties with whom the Company has any link, the pursuit of benefit for our customers must always be present.

For this, we must establish relationships based on transparency, efficiency, and respect for current legal regulations. The Company will always seek to obtain better conditions, higher quality, and better service, without arbitrarily favoring or discriminating against any supplier or third party.

We will seek not to do business or maintain commercial relationships with persons and companies that deliberately depart from the law, that engage in illicit business, or whose conduct deliberately infringes the principles and values of the Company. We will care for our reputation by seeking to engage with those who share our ethical standards.

### **Complying with Internal Rules on Gifts and Invitations**

The practice of giving or accepting gifts or invitations in business contexts is a reality. However, this may lead to abuse and create risks of corruption; it blurs the professional and personal spheres; and it increases the general cost of doing business, to the detriment of customers and the Company. Additionally, accepting gifts or invitations may create a conflict of interest or an appearance of conflict between your personal interests and your responsibility as an Employee.

We must not accept gifts or invitations from any supplier, potential supplier, public official, customer, business partner, or competitor. Such a gift or invitation may seek to influence commercial or business decisions.

Notwithstanding the foregoing, we may receive certain goods or items provided that they are of manifestly minor value, customary according to the culture, place, and circumstances in which they are given, may or may not bear the supplier's brand for the purpose of promoting its company

or services, and are distributed in good faith and indiscriminately to suppliers or customers as a marketing activity, such as keychains, pens, and caps, among others.

In the Gifts Policy and in the Invitations Policy you will find more detailed information and the exceptions to these rules.

If you have any doubt, you can consult the Integrity Counselor, the Ethics Officer, or the Ethics Department.

***Practical examples***

*A supplier invited me to lunch at an exclusive restaurant to discuss its new product line.*

*May I accept the invitation?*

Yes, you may accept, but you must request prior authorization from your supervisor and pay your own restaurant bill. Explain to the supplier that this is a Company policy. Every time you receive an invitation or a gift from a supplier, ask yourself: "Would this supplier be inviting me or offering me this gift if I did not work at the Company and did not have to make decisions that affect them?" If the answer is no, then you cannot accept.

**Looking After the Company's Assets**

We must all look after and protect the Company's assets. Therefore, we must safeguard products, information, facilities, and equipment. We cannot misuse them, that is, use them for personal purposes, carelessly, or excessively. Nor can we remove such assets from the premises where the Company has placed them, unless we have been duly authorized.

Customer lists or files, supplier records, databases, trade secrets, among others, are the property of the Company and must be managed in a strictly confidential manner. In addition, they may only be used for business purposes and by authorized persons. If, in the course of performing our duties, we generate intellectual creations, these are the property of the Company.

We must not download or install software on the Company's computers, as we may expose our network to computer viruses or violate software licenses. The software or information-processing systems provided by the Company may only be used for our work. The corporate email may only be used for business purposes, not for personal purposes.

We will use Company letterhead, stamps, and any representation of the organization only in matters related to the performance of our duties.

All Employees have the responsibility to protect the Company's assets from fraud, misuse, theft, loss, or damage and to report any such cases of which we become aware.

***Practical examples***

*My manager asked me to print her vacation photos. She tells me her printer at home is not working and acknowledges that this is an exception.*

*Is this correct?*

No. It is not appropriate for your manager to ask you to print personal items. We recommend that you report this situation to the Ethics Department, since it is not permitted to use Company assets for non-work purposes. The Ethics Department will handle this information confidentially.

## **VII. HOW TO ACT WITH INTEGRITY IN THE MARKET?**

### **Competing Fairly**

We seek to compete fairly and independently in the markets in which we have a presence, inspired by loyalty to the consumer and respect for free competition. Accordingly, we do not engage in practices that prevent, restrict, or distort free competition, or that constitute acts of unfair competition—methods that ultimately harm our customers.

To safeguard free competition, we will not participate, directly or indirectly, in any situation that may prevent, restrict, or hinder free competition; for example, collusive price-fixing agreements, abuse of a potential dominant position, or predatory practices. Likewise, we reject conduct contrary to good faith that, by illegitimate means, seeks to attract a competitor's clientele.

#### ***Practical examples***

*A Company supplier called me to offer information about the structures of discounts and margins that the supplier offers to one of our competitors.*

*May I receive that information as a parameter for our negotiations with the supplier?*

No. Under no circumstances may we receive information about, or discuss, the pricing policy that a competitor has agreed with our supplier. This constitutes a breach of free competition rules. You must immediately report this situation to your direct supervisor, the Free Competition Officer, the Legal Affairs and Governance Department, or the Ethics Department.

### **Respecting Financial and Documentary Integrity**

All transactions carried out by the Company must strictly comply with the law. In addition, all of our transactions and operations must be carried out according to their type and characteristics, without disguising them as something they are not. Finally, all of our transactions must be documented and recorded truthfully in form, date, and substance, whether in our contracts, our communications, our presentations, or our accounting.

To this end, we will maintain contracts, documents, presentations, correspondence, books, records, and accounts that are complete and reliable and that reflect the Company's operations or transactions. It is not permitted, under any circumstances, to omit or adulterate the information in these books, records, and accounts.

We must not use the Company's money for any purpose other than that assigned to it. Only persons expressly authorized may sign documents and represent the Company.

Those authorized to incur expenses must keep records to support each transaction and render accurate and timely accounts of them, in accordance with the Company's internal rules for handling money.

Likewise, we will maintain the accuracy and truthfulness of all documentation that circulates within the Company, without intentionally altering or modifying its date, content, or any other aspect.

***Practical examples***

*My manager donated a computer from those on display for sale to a low-income school and asked me to record it as a shrinkage loss.*

*May I do this?*

No. This is not only dishonest but also illegal, so you must report this situation to the Integrity Counselor, the Ethics Officer, or the Ethics Department.

**Handling Information in Accordance with the Law and Internal Rules**

Information is an important asset of the Company, and therefore it is our responsibility to protect it regardless of the medium that contains it.

Through our duties we may have access to private data of our customers, suppliers, shareholders, and/or Employees protected by law; commercially sensitive information that we cannot share with competitors; strategic information; and privileged information. It is our obligation to protect, handle, and store information in strict compliance with the law and internal rules, with absolute discretion, without using it for our own benefit or that of third parties, and likewise to destroy it securely when appropriate.

The Company has special policies and procedures to classify information according to its level of sensitivity and the treatment it should be given. It is your obligation to know and comply with those policies and procedures. In general, we may disclose information only to those persons who, by virtue of their duties in the Company, need to know it.

***Practical examples***

*One of my coworkers submitted his resignation but will still work at the Company for three more days. He told me he will take the Company's strategic plan to develop his own business.*

*Is this correct?*

No. Your coworker is breaching our Integrity Code and very likely also free competition laws. You should report this to your direct supervisor or to the Ethics Department.

**Respecting Privacy and Protecting Personal Data**

All Employees and any other persons to whom this Code applies are required to respect the privacy of the Company's customers, Employees, and suppliers, strictly complying with the Personal Data Protection regulations and with the Company's internal rules on the matter.

In addition, Employees and any other person to whom this Code applies must keep in mind that the personal data that the Company holds in its databases are its exclusive property and must not be disclosed to third parties without its express authorization, except where validly required by local authorities and laws.

Both Employees and the other persons to whom this Code applies must treat personal data with particular care. Such data may be used only for the purposes authorized by their owners, in compliance with the Company's internal rules governing the processing of personal data.

Likewise, throughout the entire process of handling the Company's personal data, Employees and other persons to whom this Code applies must safeguard the confidentiality of such data and at all times respect the security measures established by the Company for these purposes.

### **Respecting Intellectual and Industrial Property**

We are an innovative company, and we promote creativity both in our own-brand products and in those we acquire from third parties. However, we must always respect industrial and intellectual property rights.

#### ***Practical examples***

*May we market products by associating them with a distinctive sign that we have not previously registered as a trademark, and that has a notable graphic or phonetic similarity to a trademark registered in the name of a third party?*

No. Such conduct could constitute an infringement punishable by industrial property law, to the extent that it may lead to error or confusion. Moreover, the law governing unfair competition also considers, as an example of such an act, any conduct that unduly exploits another's reputation by leading to the confusion of one's own goods or distinctive signs with, for example, those of a third party.

## **VIII. HOW TO ACT WITH INTEGRITY IN SOCIETY?**

### **Complying with the Law**

As Employees, we have the responsibility to comply with the various laws and regulations that apply both in our country and in the other countries with which the Company interacts or has operations, and never to engage or participate in fraudulent activities.

#### ***Practical examples***

*My manager told me that there was a faster way to bring our products into a particular country, which involved bypassing certain regulations.*

*Should I follow my manager's instructions?*

No, because each of us is responsible for complying with all the rules and regulations of every country where we operate. This type of practice, in addition to being illegal, may result in serious reputational harm to the Company, so you must report it immediately to the Ethics Department.

## **Rejecting Any Form of Bribery**

Bribery is illegal, unethical, increases the cost of doing business, introduces uncertainty into commercial transactions, destroys trust in institutions, and prevents the efficient functioning of markets. In view of the foregoing, the Company strictly prohibits any Employee from making or offering improper payments to any person, or receiving kickbacks from such person, for the purpose of obtaining any benefit, gratuity, or providing an advantage.

Bribery means promising or delivering a benefit—whatever its nature—as well as accepting the request for a benefit from a person, whether a public official or not, for the purpose of having that person do or refrain from doing something. No Employee, even under the pretext of giving courtesy gifts, may commit bribery.

The specific criteria for the delivery of courtesy gifts are regulated in the Gifts Policy.

As Employees, we must not offer, promise, give, or consent to the giving of a benefit of any kind to a public or private employee, whether national or foreign, under any pretext or circumstance and by any means, whether to obtain advantages, influence a decision, or expedite a procedure.

### ***Practical examples***

*1. The customs inspector in the country of origin of an import offered to expedite procedures if we make a voluntary donation.*

*May I accept this request?*

No. This request likewise constitutes bribery, punishable by law as bribery of a public official. You must report this immediately to the Ethics Department.

*2. A supplier offered me a percentage of the transaction with the Company if I could intercede to close it as soon as possible.*

*May I expedite the procedure as requested without accepting what was offered to me?*

No. The mere fact of offering you an economic benefit in exchange for a specific action constitutes bribery. You must notify the Ethics Department immediately.

## **Acting Responsibly Toward Communities and the Environment**

Just as important as the relationship we maintain with our customers, suppliers, and authorities is the one we establish with the various communities in which we are present. We are part of the community; we seek not only the Company's profitability but also to mitigate possible adverse impacts on the quality of life of the communities where we operate.

We commit to being responsible regarding the possible effects or consequences that our actions may have in the places where we work, always seeking to improve the relationships with all the stakeholders involved.

Likewise, environmental care will always be a concern for us, and we will comply with all environmental laws and regulations.

## **Protecting the Health and Safety of Employees and Customers**

Our Company is committed to protecting the health and safety of its Employees and customers. As Employees, we must always comply with all laws, regulations, and policies on health and safety. Acting with integrity regarding health and safety is essential to providing a safe work environment.

### ***Practical examples***

*In the warehouse, boxes are routinely found obstructing the aisles. I have raised this with the warehouse supervisor, but he has told me it will be cleared shortly; however, the situation remains the same.*

*Should I report this situation to management?*

Yes. This situation represents a serious risk to the safety of the Employees who pass through the warehouse, and it is your responsibility to report it so that appropriate measures can be taken.

## **Complying with Product Safety**

The safety of our customers is a fundamental concern of the Company.

For this reason, it is extremely important to comply with all laws and regulations applicable to product safety. Likewise, we must require our suppliers to comply with them in order to ensure that, throughout the entire supply chain, there are no issues that may affect our Employees or customers.

## **Conducting Political Activities Outside of Work Hours and Premises**

At our Company, we value diversity in all its forms, and that includes diversity of opinion, perspective, and political participation.

We want your contribution to the Company, with your full identity, in everything that matters to you, because your dignity as an individual deserves it and because diversity enriches us.

For the same reason, in order to make room for everyone in the Company, it is important that we maintain neutrality in the workplace regarding matters not directly related to our work for the Company.

That is why, while valuing your opinion and how it manifests in your identity, we must all take care to carry out our political activities outside of working hours and premises. This also means that Employees may not use their position, title, or Company assets for their political activities.

## **Engaging with Authorities with Integrity**

We will cooperate with the requests made by the authorities in the exercise of their functions, with transparency, truthfulness, integrity, and efficiency.

As Employees, we sometimes need to carry out procedures before the authorities on behalf of the Company. In these cases we must take care to comply with the provisions of our internal rules governing how we engage with the authorities.

We will treat public authorities respectfully, refraining from any act that could negatively affect our institutional image.

### **Obtaining Authorization Before Making Statements to the Media**

Communication plays an essential role in the globalized world in which we live. For this reason, and to guarantee the accuracy and timeliness of the information provided to the public through the media, only authorized areas or spokespersons may make statements on behalf of the Company.

### **Acting with Integrity Inside and Outside of Work**

Just as you expect the Company to be a loyal corporate citizen that respects the law at all times, and not only as an employer, the Company also expects you to be ethical and upright both at work and outside of it.

The Company does not intend to interfere in your personal life; it merely invites you to live ethics and integrity both at work and outside of it. Likewise, responsible use of social media is expected regarding statements that could affect the Company's image or reputation.

Dishonest or unethical conduct by an Employee in his or her personal sphere can affect not only the Company's reputation but also the credibility that peers and subordinates place in the importance he or she gives to corporate integrity.

## **IX. CRIME PREVENTION AT THE COMPANY**

The Company is committed to preventing the commission of crimes within the organization, whether or not such crimes benefit it. For this reason, the Company has a Crime Prevention Model under Law No. 20,393 on Criminal Liability of Legal Entities, which requires strict and diligent behavior on the part of all Employees.

The commission of any crime within the organization is considered a breach of the Integrity Code. In addition, if such conduct is linked to any of the crimes included in Law No. 20,393, it will be considered a serious breach of this Code and of the Crime Prevention Model. For this reason, the Company will apply the corresponding sanctions or disciplinary measures as a clear sign of the commitment undertaken.

As Employees, in the event we become aware of the commission of any of these crimes, we have the responsibility to immediately inform the Crime Prevention Officer, the Corporate Legal Affairs and Governance Department, or the Ethics Department, through the various contact means of the Integrity Channel.

Employees must not offer or consent to the delivery to a public or private employee, whether national or foreign, of an improper benefit, under any pretext or circumstance and by any means. Nor may they receive such improper benefits.

Employees shall always ensure that the monies or assets they receive on behalf of the Company, or by reason of their work, do not come from illicit activities of any kind; shall ensure that they are never used to finance illicit activities; shall ensure that they are properly managed; and shall not carry out acts contrary to the interest of the Company or of third-party owners of the assets being managed.

## **CONTACT MEANS**

- Access button to the "Integrity Channel" link on the Company's intranet and website.
- Toll-free phone number 800 726 100.
- Email [contactochile@gerenciadeetica.com](mailto:contactochile@gerenciadeetica.com)
- In person at the offices of the Ethics Department or the Ethics Officer.

## **X. HOW TO ACT WHEN FACING AN ETHICAL CHALLENGE?**

In the face of complex decisions, the certainty of acting with integrity is not always clear.

When we face an ethical dilemma, and before acting, we must ask ourselves the following questions:

1. Do I feel good about what I am doing?
2. Is it legal?
3. Does it represent any conflict of interest?
4. Is it aligned with the Company's values?
5. Would someone I trust act the same way?
6. How would I feel if it were published on the front page of a newspaper?
7. Would my family be proud of me?

On the other hand, we all have a natural tendency to look for or invent justifications to conclude that what we have done or are about to do is not wrong, even though it is. That psychological process of accommodating or justifying the discomfort of our ethical conscience is called rationalization. Some typical examples of rationalization are the following justifications:

8. Just this once will not matter.
9. No one will notice.
10. Everyone does it.
11. We have always done it this way.
12. In practice, this is how it works.

Be careful! Phrases like these are often excuses to allow ourselves to do what we know is wrong.

If you have any doubts, we recommend that you approach the Integrity Counselor, the Ethics Officer, or the Ethics Department, who will guide you so that you can make the best decision.

## **XI. MEASURES APPLICABLE IN CASE OF NON-COMPLIANCE**

The Company may apply disciplinary measures ranging from a verbal warning to dismissal of the Employee, in the event of non-compliance with our Integrity Code or with applicable laws or regulations.

The measures to be applied will be determined based on the seriousness of the non-compliance, the impact and significance for the Company, and the responsibility of the person who committed it.

Furthermore, the foregoing sanctions will likewise apply to anyone who intentionally makes false accusations or lies in the cooperation requested of them in the investigation of an ethical case.

## **XII. OUR COMMITMENT TO INTEGRITY**

Principles and values may remain dead letters if we do not keep in mind the most important thing: our commitment to integrity.

As a sign of having received this Code and having read and understood it, I commit to the following:

13. To accept personal responsibility for maintaining the integrity of our Company in each of my actions and decisions, respecting the values, principles, standards, and policies described in this Integrity Code and in the Company's other policies and official documents.
14. To accept the duty to act by example, always maintaining a proper attitude and avoiding those situations that may harm our customers, Employees, or the Company's reputation.
15. To consult in case of doubts about the scope of ethical obligations and to report in good faith those situations that constitute a breach of these rules.
16. To maintain due confidentiality after filing a report or after cooperating in an ethical investigation.