



HOTLINE
EMPRESAS COPEC S.A.

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1. HOTLINE

The Company has an additional communication channel to those already existing, confidential and anonymous, so that any person who has information regarding an act or fact which constitutes a breach of Law N° 20.393 and its amending laws ("Law N° 20.393"), or about conducts that go against those principles set forth in the Code of Ethics –Values and Principles of the Company, Human Rights Policy or Diversity and Inclusion Policy, by its personnel or by entities in any way related to it, may raise such concerns directly up to the Person in Charge of Offense Prevention.

This reporting mechanism is called "Hotline" and operates through:

a) Web Page: <https://empresascopec.eticaenlinea.com>

b) Regular mail directed to:

Mrs. Empresas Copec S.A.
Person in Charge of Offense Prevention
Av. El Golf 150, Piso 17
Las Condes, Santiago

c) Direct communication to the superior chief, who will refer the complaint to the Person in Charge of Offense Prevention.

The "Hotline" channel is handled by the "Person in Charge of Offense Prevention". Such role is fulfilled by a person appointed by the Board, who must maintain confidentiality of received complaints at all times, including protecting the identity of the whistleblower who responsibly raised concerns.

Additionally, the Board has appointed an Ethics Committee that will advise the Person in Charge of Offense Prevention in the analysis of received complaints.

The Company guarantees the confidentiality and anonymity of the whistleblower at any time. Nevertheless, some contact method should be included in the complaint, so as to be able to inform on its status. No instance (Management or Areas) may retaliate against any person who in good faith makes a complaint regarding the crimes listed. Any retaliation is considered a serious offense and will be grounds for investigation. The identity of the whistleblowers will be protected in the best possible way.

Responsible complaints must be understood as a contribution toward keeping a high ethical standard within the Company, and under no circumstances will they be exposed to retaliations or negative consequences.

2. COMPLAINT PROCEDURE

2.1 OBJECTIVE

Establish a procedure for the analysis of complaints received about possible cases, situations or questionable practices in which the provisions of the Offense Prevention Model, laws, regulations, and internal policies, procedures and norms of the Company.

2.2 DEFINITIONS

- Hotline: Channel by which employees, advisors or third parties can make their complaints against violations of the Code of Ethics - Values and Principles, laws, regulations, and policies, procedures and other internal norms associated with ethical conduct and the Offense Prevention Model.
- Code of Ethics – Values and Principles: Guide that promotes employees, regardless of their hierarchical rank, behaviors whose hallmarks are straightness and honesty.
- Violation of the Code of Ethics - Values and Principles: Any violation of the provisions of the Code of Ethics or any other rule, law or procedure; bad practices, corruption, fraud, abuse of authority, danger to the health and public safety of employees, or any concealment of any bad practice.

- Person in Charge of Offense Prevention: Person responsible for coordinating the activities to be developed, once the complaint is known. In addition, he is responsible for the confidentiality and protection of the identity of the whistleblower.
- Infringement: Conduct or omission contrary or irregular with respect to what is established in laws, regulations, and policies, procedures and other internal norms with respect to Law N° 20.393 or a conduct that departs from the principles established in the Code of Ethics – Values and Principles of the Company.
- Whistleblower: Person that through established and regular channels reveals or informs violations of laws, regulations, policies, procedures and other internal and external rules.

2.3 REPORTABLE ACTIVITIES

In general, any unlawful activities or conducts that inure to the direct benefit of the Company or its owners, officers or representatives, as established in Law N° 20.393 on Criminal Liability of Legal Entities and its amending laws.

Such activities include:

a) Bribery

Commit the crime of bribery:

- The one who gives, offers or consents to give a public employee an economic or other benefit, for the benefit of this or a third party, because of the position of the employee under the terms

of the first paragraph of article 248 of the Criminal Code, or to perform the actions or incur in the omissions indicated in said article. (Definition according to the Criminal Code, Article 250).

- The one who, with the purpose of obtaining or maintaining for himself or for a third party any business or advantage in the field of any international transactions or an economic activity carried out abroad, offers, promises, gives or consents to give to an official foreign public an economic or other benefit for the benefit of this or a third party, because of the official's position, or to omit or execute, or for having omitted or executed, an act of his or her own charge or in violation of duties of his office. (Definition according to the Criminal Code, Article 251 bis).

- The public employee requesting or accepting to receive an economic or other benefit for himself or for a third party to commit any of the crimes or simple crimes expressed in Title V of the Criminal Code, or in paragraph 4 of Title III thereof Code. (Definition according to the Criminal Code, Article 249).

b) Asset Laundering

Any act tending to hide or conceal the unlawful origin of certain goods, while being aware that these come directly or indirectly from the performance of criminal activities such as: illegal traffic of narcotics and psychotropic substances, terrorist activities, weapons trafficking and criminal organizations (promotion of child prostitution, kidnapping, etc.). Asset laundering also includes any act in which the aforementioned goods are acquired, owned, held or used, with the

purpose of profit if, at the time of procurement, their illicit origin is known.

Asset laundering is an attempt of hiding or concealing the nature, location, origin, ownership or control of money or other goods obtained illegally, and it is a complex and dynamic process through which these assets, illicit in origin, are introduced into a company, and through it into the economy of a country, trying to give them an appearance of lawfulness.

c) Financing terrorism

This crime is committed by any person who, by any means, requests, collects or provides funds with the intent of using them for any terrorist activity, such as hijacking or attacking a public transport vehicle in service, attacking a Head of State and other authorities, conspiring with the purpose of committing terrorist crimes. (Definition according to the Law N° 18.314, Article 8).

d) Receiving

The offense of receiving is committed who, knowing its origin or being able to know it, has in its power, under any capacity, stolen, stolen or object of cattle-raiding, transport, buy, sell, transform or commercialize in any form. It is an aggravating circumstance if the species are motor vehicles or things that are part of public or home service supply networks, such as electric cables, gas pipes, water, sewage, rainwater collectors or telephony. (Definition according to Criminal Code, Article 456 bis A).

e) Corruption between individuals

Commit the crime of corruption:

- The employee or agent of the private sector who will request or accept to receive an economic or other benefit, for himself or a third party, to favor or to have favored, in the exercise of his work, the hiring with an offeror over another (Definition according to the Criminal Code, Article 287 bis).
- The one who gives, offers or consents to give, to an employee or agent of the private sector, an economic or other benefit, for himself or a third party, to favor or for having favored the hiring with an offeror over another (Definition according to the Criminal Code, Article 287 ter).

f) Unfair administration

This crime is committed by the person in charge of safeguarding or managing the assets of another person, or any part thereof, under the law, of an order of the authority or of an act or contract, will be subject to prejudice, either by exercising abusively powers to dispose of it or compelling it, either by executing or omitting any other action in a manner manifestly contrary to the interest of the owner of the affected estate (Definition according to the Criminal Code, Article 470 number 11).

g) Incompatible negotiation

This crime is committed by the person in charge of safeguarding or managing all or part of the property or assets of another person, be it natural or legal; and is interested directly or indirectly in any negotiation, action, contract, operation or management in which it will have to intervene in relation to the assets or assets under its charge (Definition according to the Criminal Code, Article 240).

h) Improper appropriation

This crime is committed by anyone who in detriment of another appropriates or distracts money, effects or any other movable thing that he had received in deposit, commission or administration, or by another title that generates obligation to deliver or return it (Definition according to the Criminal Code, Article 470 number 1).

i) Any other offense contemplated in Law N° 20.393

j) Contraventions: Include, among others, the following:

- Improper actions related to suppliers, contractors and advisers.
- Any sort of agreement aimed at hindering or preventing competition.
- Accounting practices to deliberately conceal losses, creating nonexistent or fictional profit, or manipulating the value of assets and/or liabilities.

- Concealing information or intentionally delivering misleading information to authorities and external or internal auditors.
- Disclosure of nonpublic information.
- Not declaring conflicts of interest.
- Working under unsafe conditions.
- Forgery of agreements, certificates, reports or records.
- Misuse of bonds or securities.
- Concealing environmental damages.
- Workplace discrimination of any kind.
- Providing considerations and/or gifts of excessive value to public and/or private workers, or receiving such from them.
- Workplace or sexual harassment.
- Installation and/or use of non-licensed software in Company equipment.

This is not a comprehensive list of all the situations that may arise, being only for exemplary purposes.

2.4. CONTENTS OF A COMPLAINT

With the purpose of facilitating the inquiry, the whistleblower has to consider the submittal of the following information, when available:

- Date and time of the reported acts.
- Unit in which it took place: division, place, department, section etc.
- Type of infringement: Money, goods, information, etc.
- Involved personnel: internal, external or both.
- Persons involved in the situation: name, surname, position and area.
- Time frame during which the acts have taken place.
- Manner in which he became aware of the situation.
- Details related to the alleged infringement: existence of witnesses, willingness to cooperate, etc.
- Supporting backgrounds.
- Recommendations on the best way to approach the inquiry.
- If the supervisor(s) was (were) previously informed: name, date.
- Requesting for protection of identity.

2.5 PROCESSING OF COMPLAINTS

Complaints received by e-mail, like those received by regular mail, will be sent to the Person in Charge of Offense Prevention.

Once the complaint has been received, and in accordance with its merit, the Person in Charge of Offense Prevention must promptly carry out a preliminary investigation, gathering the pertinent information, to immediately report everything to the Ethics Committee, with whom he will agree on the courses of action to be followed.

The course of action to follow includes:

- Collect information about the reported event.
- Interview the personnel involved in the complaint.
- Analyze the information obtained through the collection and interviews held.
- Document the research carried out, procedures and tests performed, and the results obtained.
- Conclude about the research carried out.
- Propose corrective measures that can be recommended.

2.6 FOLLOW-UP AND OUTCOME OF THE COMPLAINT

The Person in Charge of Offense Prevention will inform the whistleblower the reception of the complaint and the end of the investigation.