

Human Rights Policy Empresas Copec S.A.

September 2026



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1. INTRODUCTION

Empresas Copec conducts its activities in a business environment founded on active cooperation and respect for its stakeholders, seeking to contribute to the country's sustainable development.

Consistent with its purpose, "To shape the world for future generations," the Company understands that creating sustainable value requires acting with respect for human dignity and human rights.

This Human Rights Policy sets out the principles that guide Empresas Copec's actions in this area.

The commitments and guidelines established herein apply to Empresas Copec, as a holding company, within the scope of its operations.

2. PRINCIPLES

2.1 Respect for Internationally Recognized Human Rights

Empresas Copec is committed to respecting internationally recognized human rights in the conduct of its activities, understood as those set forth in the International Bill of Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work, as further detailed in Section 2.2.

Likewise, Empresas Copec adheres to the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights. These instruments provide a framework for interpreting this Policy and guide the due diligence standards applicable to Empresas Copec's operations and investments.

2.2. Principles of Conduct

Empresas Copec's commitment to respecting human rights in the conduct of its activities is reflected, among others, in the following principles of conduct:

a) Respect the human rights recognized in the International Bill of Human Rights that are applicable to its activities, namely, the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights¹.

b) Respect the fundamental principles and rights at work recognized by the International Labour Organization, including freedom of association and the right to collective bargaining; reject and prevent involvement in child labour in all its forms, human trafficking, and forced or compulsory labour; eliminate discrimination in employment and occupation; and respect the right to a safe and healthy working environment.

c) Avoid causing or contributing, through its activities, to adverse impacts on the human rights referred to in paragraphs (a) and (b).

d) Promote awareness-raising, education, or training initiatives aimed at those who are required to understand or apply this Policy in the performance of their duties.

¹ These instruments comprise the International Bill of Human Rights and recognize, among others, the following rights: life, liberty and security; equality and non-discrimination; privacy; freedom of thought, expression and association; work and just and favourable conditions of work; social security; health; education; and an adequate standard of living.

To this end, Empresas Copec will develop human rights due diligence processes proportionate to its nature as an investment holding company, aimed at identifying and assessing actual and potential risks and impacts, adopting measures to prevent or mitigate them, monitoring the effectiveness of such measures and, where appropriate, communicating how they are addressed.

3. COMPLIANCE FRAMEWORK

3.1 Scope

This Policy is mandatory for the entire organization, including directors, executives, employees, suppliers, contractors, advisors, external collaborators, and other relevant business relationships of Empresas Copec.

Empresas Copec also considers it important that its subsidiaries and affiliated companies share these principles of conduct regarding respect for human rights.

3.2 Governance and Responsibilities

Executive responsibility for the implementation of this Policy and for relevant decision-making on human rights matters shall rest with Empresas Copec's Sustainability and Corporate Affairs Department, with the support of the Executive Sustainability Committee and the relevant corporate functions.

The day-to-day management of these commitments shall be the responsibility of the relevant areas according to their respective functions, including sustainability, compliance, risk management, and internal audit, which shall integrate them into their processes, controls, management systems, and reporting.

3.3 Grievance and Remediation Mechanisms

Questions, inquiries, or reports related to the application or potential breach of this Policy may be submitted through the following channels:

- a) Website: <https://empresascopec.eticaenlinea.com/denuncias>
- b) Regular mail addressed to:
Empresas Copec S.A.
Crime Prevention Officer
Av. El Golf 150, 17th Floor
Las Condes, Santiago

- c) Direct communication to the relevant supervisor, who will refer the report to the Offense Prevention Officer.

Any person who submits a report in good faith shall not be subject to retaliation or adverse consequences as a result, in accordance with the applicable reporting procedures.

Where Empresas Copec identifies that it has caused or contributed to an adverse human rights impact, it is committed to providing for or cooperating in its remediation through legitimate processes, including judicial and non-judicial mechanisms, as appropriate. The Company also expects its subsidiaries and other relevant business relationships to share this approach.

4. APPROVAL AND AMENDMENTS

This Policy was originally approved by the Company's Board of Directors at its meeting held on December 19, 2019. Its updated version was approved at the meeting held on August 27, 2026. In the event of any subsequent amendments, this section shall state the date of the Company's Board meeting at which the relevant amendment was approved.

5. TERM

This policy shall take effect on August 27, 2026, and shall remain in force indefinitely, unless otherwise resolved by the Company's Board of Directors.

6. DISCLOSURE MECHANISMS

The full and updated text of this Policy shall be made and kept available to interested parties on the Company's website (www.empresascopec.cl/en/).

Empresas Copec shall communicate this Policy internally and externally, as appropriate.

Approval Date:	Prepared by:	Approved by:
19 December 2019	Empresas Copec Management	Empresas Copec Board of Directors

Change Log:

Date	Responsible Area	Main Modifications	Reason
19 December 2019	Empresas Copec Management	Initial issuance	Creation
27 August 2026	Empresas Copec Management	Update	Periodic review

Disclosure:

Medium	Location
Corporate Website	https://www.empresascopecl.cl/en/
Investor Relations Website	https://investor.empresascopecl.cl/
CEO Communication	Email