

CODE OF CONDUCT AND ETHICS

COSAYACH



Objective

This Code of Ethics procedure outlines the policies and establishes standards of ethical behavior and business conduct applicable to all personnel, senior executives, and members of the company's board of directors, regardless of their contractual relationship with the organization. These standards shall apply henceforth to SCM Corporación de Desarrollo del Norte.

Scope

This procedure applies to all individuals working for the company (employees), across all company premises, including headquarters, production plants, branches, and/or work sites in general. All such individuals are required to act in accordance with the provisions established in this procedure.

Responsibility

Management: Responsible for ensuring compliance with this procedure.

Definitions

- 1 Code of Ethics:** Ethics is linked to morality and defines what is good, bad, permissible, or desirable in relation to an action or decision. Ethics can be defined as the science of moral behavior, as it studies and determines how members of a society should act.
- 2 Conduct:** This refers to the manner in which a person behaves in various areas of their life. The term can be used synonymously with behavior, as it relates to the actions an individual takes in response to stimuli and the relationships they form.
- 3 Corruption:** The practice of abusing power, responsibilities, or resources for personal gain, whether economic or otherwise.
- 4 Loyalty:** The fulfillment of obligations dictated by the principles of fidelity and honor. According to certain beliefs, a person of integrity must be loyal to others, to certain institutions, organizations, and to their nation.

5 Harassment: In general terms, harassment refers to any behavior intended to, or having the effect of, undermining a person's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive work environment. Examples include inappropriate sexual behavior, threats or physical intimidation, as well as any offensive comments, jokes, or slander.

6 Confidentiality: This refers to the quality of being confidential—something shared or done in trust and with mutual assurance between two or more individuals. It is a property of information that aims to ensure access is restricted to authorized individuals only, particularly when dealing with confidential information.

References

Internal Rules and Regulations on Order, Hygiene, and Safety of SCM Corporación de Desarrollo del Norte.

Description of the Code

The Code is based on the core values of our company. This document represents our commitment to maintaining ethical business practices and to meeting or exceeding applicable legal requirements. We believe that consistent and appropriate business conduct fosters loyalty and trust among stakeholders and within our organization.

Every employee associated with SCM Corporación de Desarrollo del Norte must promote and maintain a transparent environment in their assigned activities, workplace relationships, and management practices, all grounded in ethical principles and carried out with integrity.

Employees are required to understand and comply with the Code of Conduct and Ethics, and to support its implementation within the company, including reporting any violations or suspected breaches.

SCM Corporación de Desarrollo del Norte will not tolerate any actions by its employees that deviate from legal and ethical standards or that constitute non-compliance with this Code.





Acting with Integrity in Our Workplace

The company respects the dignity of every employee, which is fundamental to building organizational integrity. It firmly opposes any violation of dignity—whether toward its employees or third parties associated with the company—and will apply appropriate sanctions when these principles are breached.

Harassment, abuse, intimidation, lack of respect and consideration, or any form of physical or verbal aggression are unacceptable and will not be permitted or tolerated in the workplace.

Those subject to the Code who have personnel under their supervision must actively promote and ensure, using all means at their disposal, that such situations do not occur.

All employees subject to the Code, and especially those in leadership roles, must consistently promote relationships based on respect for the dignity of others, participation, fairness, and mutual collaboration—at all professional and non-professional levels.

They are responsible for fostering a respectful work environment that contributes to a positive workplace climate.

At SCM Corporación de Desarrollo del Norte, we have adopted a code of conduct policy that ensures our working relationships are governed by the values of honesty, integrity, and transparency. To uphold these principles, the company commits to:

- Respecting all individuals regardless of their ideological and philosophical views, political beliefs, religious convictions, sexual orientation, race, nationality, ethnicity, or any other personal characteristic.

- **Commitment to promoting diversity and inclusion** as a source of mutual enrichment among employees. Therefore, any form of arbitrary discrimination or harassment will not be tolerated.
- **Commitment to protecting individuals, their health, and dignity**, including a strict prohibition of forced and child labor.
- **Commitment to protecting the identity of employees who report violations.**
- **Commitment to ensuring that no retaliation** is taken against individuals who report concerns in good faith.
- **Commitment to fostering positive relationships among employees**, creating a respectful and trustworthy work environment.
- **Commitment to maintaining professional and honest relationships with our suppliers**, ensuring they are treated with respect and without discrimination.
- **Commitment to fully complying with alcohol and drug policies**, as the safety of our employees, clients, and/or suppliers is one of the company's top priorities. The use of illegal drugs, misuse of prescription medications, and alcohol consumption can compromise safety standards.
- **Commitment to the community and the environment**, recognizing that we are part of a broader community. Our goal is not only the company's economic benefit but also to mitigate potential adverse impacts on the quality of life of local communities and the environment in which we operate.

Whistleblowing Channel

The integrity of our company is built every day by all of us. Therefore, every employee has the duty to report any situation that deviates from the expected and regulated conduct outlined in this Code. If an employee becomes aware of or witnesses a violation of the Code of Conduct, it must be reported so that the matter can be investigated and appropriate measures can be taken.

The email address for reporting any violations of the Code is:

denuncias@scmcosayach.cl

Compliance with Laws and Regulations

In all their actions, employees are required to fully comply with applicable legal provisions, regulations, and standards related to their roles within the company. Likewise, they must adhere to the company's established policies and guidelines.

The following are key points that all employees of the company must understand and strictly comply with:

- Conflict of Interest
- Confidential Information
- External Relations with Authorities
- Crime Prevention within the Company (Law 20,393)
- Insider Information
- Independence of External Auditors
- Gifts and Invitations Policy
- Company Assets
- Fraud.





Conflict of Interest

As employees, we have the responsibility and obligation to make decisions and act in the best interest of the company. Therefore, we must avoid any situation in which our personal interests conflict—or appear to conflict—with the interests of the company.

To ensure proper conduct, four key points must be observed to avoid conflicts of interest:

- **External Activities:** These must be declared and must not pose a risk to the company's interests. The company recognizes and respects employees' rights to engage in external activities—whether financial, commercial, or otherwise—provided they are legal and do not interfere with the fulfillment of their duties within the company.
- **Employee Obligations:** This includes all private commercial relationships with individuals or entities outside the company. Employees must avoid situations or personal involvement where their private interests may conflict with the company's interests or those of its business partners.
- **Compliance with Laws and Company Policies:** Employees must always act in accordance with applicable laws, regulations, and company policies, while protecting the company's assets, property, rights, interests, reputation, institutional responsibility, and confidential or proprietary information.
- **Related Parties:** Employees must avoid actual or potential conflicts of interest in dealings or transactions with related or affiliated companies, as well as with other employees.
- **Executive Restrictions:** Employees in executive positions are prohibited from approving amendments to company bylaws or adopting policies or decisions that serve their own interests or those of related individuals up to the second degree of kinship. They are also prohibited from obtaining loans or using company funds or assets for personal purposes.





Confidentiality of Information

Insider Information

Insider information refers to material information about a company that is generally not available to the public. The criterion for determining whether certain information qualifies as insider information is whether it would influence the decision of a reasonable investor regarding whether to invest in the company.

Possessing insider information is not a crime in itself; however, in many countries, it is illegal to buy, sell, or trade securities while in possession of such information.

It is also a crime to encourage others to misuse insider information or to disclose such information so that others may take advantage of it.

It is important that such information is never used to improperly influence decision-making processes or to create the perception that illicit influence has occurred.

External Relations and Interactions with Authorities

Employees must refrain from disclosing any information or news about the company or third parties to external parties or the media on their own initiative. Any such communications must be handled exclusively by General Management. In the event that a request for information is made by a regulatory or supervisory body, it must be immediately referred to General Management.

Crime Prevention – Law No. 20,393: Criminal Liability of Legal Entities

The commission of crimes included under Law No. 20,393 is considered a serious violation of the Code of Conduct. In such cases, the company will apply the corresponding sanctions and/or disciplinary measures, sending a clear message of its commitment to compliance.

As employees, if we become aware of the commission of any of the listed offenses, we have a duty to report them immediately through the channels established for this type of disclosure. The offenses in effect as of the date of this Code's issuance are as follows:

Category One Offenses: Core economic crimes committed in regulated markets:

- Bribery or corruption, corruption between private parties, embezzlement, conflict of interest, disloyal administration, anti-competitive practices, among others.
- Crimes under the Securities Market Law, General Banking Law, violations of the Corporations Law, and offenses related to financial instruments clearing and settlement systems.

Category Two Offenses: Common crimes that are considered economic when committed:

- In the exercise of a role, duty, or position within a company, or for the economic (or other) benefit of a company (such as water pollution, tax offenses, customs violations, cybercrimes, among others).

Category Three Offenses: Crimes committed by individuals in a business role, either as perpetrators or accomplices, in the course of their duties or for the benefit of the company. This includes: forgery of public documents, breach of confidentiality, among others.

Category Four Offenses: Crimes involving the receipt, laundering, and concealment of assets, as well as the financing of terrorism, when linked to offenses from the previous categories.



Accounting Policy

Accounting is essential for the management and operational control of the company's business activities. It serves as the source of all financial information provided to shareholders, regulatory authorities, investors, business partners, employees, and the general public. The company's accounting policy is based on applicable legal and regulatory standards in the countries where it operates.

It is the responsibility of each employee, within the scope of their role, to ensure full compliance with the company's accounting policies and practices, as well as with any instructions issued by the competent authority.

Independence of External Auditors

Employees have a special obligation to preserve the independence of external auditors at all times and under all circumstances, avoiding any undue influence over the external audit process. It is also a specific duty of employees to ensure that external auditors have access to all company books, records, documents, and information, and to guarantee that the company provides them with all necessary support to carry out their work effectively.

Gifts and Hospitality Policy

It is important to take all necessary precautions when accepting gifts, hospitality, or entertainment, in order to protect the reputation of third parties and of SCM Corporación de Desarrollo del Norte from allegations of unlawful conduct, and to ensure compliance with anti-corruption regulations.

Gifts, hospitality, and entertainment should only be accepted if they are occasional and of modest value.

Determining what is considered 'occasional' and 'modest' is a matter of judgment.

Gifts, hospitality, or entertainment must not be solicited from any individual or entity with whom SCM Corporación de Desarrollo del Norte conducts business, including suppliers, clients, and business partners.

Company Assets

All employees are responsible for safeguarding and protecting the company's assets. This includes ensuring the proper care of products, facilities, information, and equipment. Under no circumstances may these assets be misused or used for personal purposes. Additionally, the removal of company property from its premises is strictly prohibited unless expressly authorized by a designated authority.

Employees are strictly prohibited from downloading or installing software on company computers, as doing so may expose our network to computer viruses or violate software licensing agreements. The software and information processing systems provided by the company may only be used for work-related purposes and not for personal or private use.

Fraud

Fraud is understood as deception or abuse of trust committed by an employee that results in financial harm to the company. It must be clearly understood that fraudulent behavior is considered a serious offense by the company, regardless of any legal determinations made by the courts.

All fraudulent conduct must be reported promptly through the appropriate channels, and the identity of the individual making the report must be protected at all times.



