

FREQUENTLY ASKED QUESTIONS ABOUT THE USE OF THE WHISTLEBLOWING CHANNEL

In compliance with Law N°20,393 which establishes in its article 4°, paragraph 2 the implementation of safe channels of denunciation, the company has a "Channel of Denunciations (Whistleblower Channel)" available for all employees or third parties who require to make use of it to inform or denounce any irregular situation or non-compliance in a safe and confidential way.

This material has been prepared exclusively for general use and guidance on questions regarding the company whistleblower channel and is intended to answer or advise all those who have doubts about its use.

1. WHAT IS THE CHANNEL OF DENUNCIATIONS OF THE COMPANY?

Answer:

The whistleblowing channel is the confidential and secure communication channel through which the company receives and manages the complaints (or communications) made by the employees or by third parties linked to it, about possible irregular or illicit conduct which they may have witnessed or have knowledge of, and which are contrary to the rules of the companies.

2. HOW DOES THE WHISTLEBLOWING CHANNEL WORK?

Answer:

- a) The complainant can access from any device to the e-mail address provided for the purposes of this whistleblowing channel and deliver all the necessary background information, if he/she has it, to be able to carry out an investigation.

The company has its own e-mail address.

COMPANY	WHISTLEBLOWING CHANNEL	TYPE OF COMPLAINTS
COSAYACH	denuncias@scmcosayach.cl	All types of complaints

- b) The complainant will be given notice of receipt on the working day following the day the complaint was sent, which will be registered with a unique folio number for its identification and follow-up, which must be used in case the complainant wants to add any new background information and/or follow up on the complaint.
- c) The person in charge of the whistleblowing channel must determine the veracity and seriousness of the information provided to proceed with the investigation.
- d) If the complaint is processed, the Whistleblower Channel Manager will have 30 calendar days to respond to the complaint, which may be increased by an additional 30 calendar days by notifying the complainant.

3. WHAT IS THE FOLIO NUMBER ASSIGNED TO EACH COMPLAINT FOR?

Answer:

The folio number is a code assigned to each report for identification and follow-up purposes, which the complainant must use to follow up and/or add new information.

4. WHAT TYPE OF CONDUCT SHOULD AND/OR CAN BE REPORTED IN THE WHISTLEBLOWER CHANNEL?

Answer:

Any breach of the Code of Conduct and Ethics, Internal Rules of Order, Hygiene and Safety (RIOHS), Policies, Procedures, Manuals and Instructions or any other internal document that involves an infraction or offense to a regulation, or to any law (including but not limited to Law N°20,393).

5. WHAT INFORMATION SHOULD I INCLUDE IN THE COMPLAINT?

Answer:

For the purposes of the whistleblower channel, a complaint form is available on the company website, which should be completed and submitted.

If the complainant does not wish to complete the complaint form, he/she should provide a detailed description of the facts and the background that support the complaint, if he/she has them:

- Contact data, in case you need more or complementary information.
- Estimated date of the denounced facts.
- Place where the facts occurred (Management Office, branch, etc.).
- Parties involved, whether directors, managers, employees, suppliers, clients, etc.
- People involved in the situation: name, surname, position and area.
- Type of infraction, illicit or crime.
- The way in which the reported situation or facts were reported.
- Time that the reported facts have been happening.
- Related details: existence of witnesses, willingness to cooperate, etc.
- Indicate if you notified another person of this situation (indicate name and estimated date).
- Any recommendations on the best way to approach the investigation.
- Attach supporting information (photos, videos, audios, invoices, emails, etc.).
- Other data and information you consider relevant to the investigation.

6. WHERE CAN I FILE A COMPLAINT?

Answer:

Complaints can be made in the following ways:

- a) Email (whistleblower channel);
- b) Informing your manager or hierarchical superior, who must notify the Compliance Officer;
- c) Send a letter to the Compliance Officer, to the address (indicate the address of this building); or
- d) Verbally by making direct contact with the Compliance Officer.

7. WHAT HAPPENS AFTER A COMPLAINT IS FILED AND/OR MADE?

Response:

Once the complaint is received, the Whistleblower Channel Manager will analyze whether:

- a) An investigation is initiated or not. When an investigation is not warranted, either by misuse of the Whistleblower Channel by users or lack of information, the complainant will always be notified by email, and the complainant may appeal by adding more background information on the case to be reviewed.
- b) If the complaint warrants the initiation of an investigation, the Channel Manager will review whether specialized support is required, for example, from a lawyer, the head of the Compensation area, etc.

8. HOW IS THE CONFIDENTIALITY OF A COMPLAINT ENSURED?

Answer:

The identity of the complainant will be kept confidential during and after the investigation, except in those cases in which, by court order, the identity of the complainant and/or those involved is required to be provided, among other data. In relation to the interviews and statements taken of those involved (i.e. the Complainant, Witnesses and the Complainant), the Whistleblowing Channel Manager and any investigator who supports complex complaints will safeguard the confidentiality and content of the investigation. Whoever has access to the information contained in the complaint for the purposes of an investigation must sign an annex "Declaration of Confidentiality of the Investigator".

9. CAN I SUFFER REPRISALS FOR FILING A COMPLAINT?

Answer:

Under no instance, the company as indicated in its "Code of Conduct and Ethics", will accept that any person, independent of their company, area, position or hierarchy will carry out retaliatory actions against any person who in good faith makes a complaint.

10. WHAT SHOULD I TAKE INTO CONSIDERATION WHEN MAKING A COMPLAINT?

Answer:

Any complaint must be made in good faith, otherwise, if your complaint is made in bad faith or induces errors, deceit and/or generates a bad expenditure of resources or damages for the company or its related companies, such action could be sanctioned with any of the practices included in the Disciplinary Actions Policy and/or legal actions.

11. CAN I ADD ADDITIONAL BACKGROUND INFORMATION TO MY COMPLAINT?

Answer:

The complainant may add new background information to his or her complaint whenever he or she deems necessary.

12. HOW LONG DOES IT TAKE TO RESOLVE A COMPLAINT?

Answer:

The Whistleblowing Channel Manager will have a maximum of 30 calendar days to respond to the complaint, and could increase by an additional 30 calendar days, always giving notice to the complainant

13. WHO RECEIVES AND INVESTIGATES MY COMPLAINT?

Answer:

The person in charge of the whistleblowing channel is the one who receives and investigates the complaints and may designate an investigator in the case of complex complaints, who may be from Legal, Systems and/or IT Management, Compliance Officer, Compensation and Human Capital, among others, for which they must sign Annex 03 "Investigator's Declaration of Confidentiality". The signature of this document will be filed in the SharePoint folder of the case.

14. CAN MY COMPLAINT BE REJECTED?

Answer:

Yes, when it is deemed that it is not warranted to initiate an investigation, either due to misuse of the Whistleblower Channel by users or lack of information, the complainant will always be notified by email, and the complainant may appeal by adding more background information on the case to be reviewed.

15. WHAT ARE THE SANCTIONS CONTEMPLATED BY THE COMPANY?

Answer:

The non-compliance with any internal document, regulations, will give rise to the application of one or more sanctions indicated in the " Disciplinary Actions Policy of the company" and/or legal actions.

16. WHO HAS ACCESS TO WHISTLEBLOWER CHANNEL?

Answer:

The person in charge of the Whistleblower Channel (Compliance Officer).

17. CAN I MAKE MY COMPLAINT ANONYMOUSLY?

Answer:

The whistleblower can choose to remain anonymous or identify him/herself to be contacted if required. Whoever chooses to report anonymously must indicate and attach as much background information as possible to support the report, otherwise the investigation may be closed due to lack of background information.

18. WHAT IF I WANT TO BE IDENTIFIED FOR THE PURPOSES OF MY COMPLAINT?

Answer:

If you wish, you may identify yourself at the time you make your complaint or provide details that will allow you to be contacted in case you are required to do so.

19. WHAT IS THE OBLIGATION AND/OR DUTY OF THE COMPLAINANT?

Answer:

- To be familiar with and comply with the Crime Prevention Model and any related documents.
- To report in a timely manner the occurrence of any unusual, illegal or criminal situation.
- Provide as much reliable and unadulterated information as possible.
- Cooperate and provide background information during the investigation of the complaint.
- Provide background information to assist in the investigation.
- Prohibition to inform the affected person(s) or any third party about information related to an investigation.

20. WHAT HAPPENS IF THE FACTS REPORTED ARE PROVEN TO BE TRUE?

Answer:

Without prejudice to the sanctions indicated in Law N°20.393 or the sanctions indicated in the "Disciplinary Action Policy", the company may initiate legal actions, whether civil, criminal or of any nature, including administrative and/or any other as appropriate, for the investigation and/or denunciation of the facts, to make effective the responsibility of the offender and/or third parties, and/or to obtain the restitution of the losses caused and/or the compensation of the damages or prejudices caused to the company and its related companies.

21. HOW CAN I COMMUNICATE WITH THE PERSON IN CHARGE OF RECEIVING MY COMPLAINT QUICKLY?

Answer:

Directly through the email of the company Whistleblower Channel.

22. HOW CAN I KNOW THE STATUS OF MY COMPLAINT?

Answer:

At the moment of making the complaint, you will be assigned a folio number with which you will be able to consult at any moment the status of your complaint.

23. CAN I FILE A COMPLAINT THROUGH ANOTHER CHANNEL DIFFERENT FROM THE WHISTLEBLOWER CHANNEL?

Answer:

Complaints can be made by the following means:

- a) Email (whistleblower channel);
- b) Informing your manager or superior who must notify the Compliance Officer;
- c) Verbally by making direct contact with the Compliance Officer; or
- d) In writing by sending a letter addressed to the Compliance Officer, to the following address:
 - Amunátegui Street 178, 4th floor.
 - Santiago, Chile
 - Postal Code: 8340467

24. CAN I WITHDRAW THE COMPLAINT?

Answer:

Once a Complaint is filed, it is archived and registered in the system, and it is not possible to remove it. However, if you wish to add any comments, you can contact the person in charge of the Whistleblower Channel using the folio number assigned when the complaint was filed.

CONTACT US

If you have any questions about the use of the Whistleblower Channel, the Whistleblower Channel Procedure, Disciplinary Action Policy or any other document, please contact the Compliance Officer with your questions or write to the e-mail address Cumplimiento@grupoerrazuriz.cl

