



Whistleblower Channel Procedure





Introduction

In compliance with Law No. 20,393 which establishes the Criminal Liability of Legal Entities—sanctioning various offenses with fines and/or imprisonment—and specifically Article 4 (number 2), which mandates the implementation of secure reporting channels for breaches of protocols and procedures designed to prevent and detect criminal conduct, the company, has established the following Whistleblower Channel Procedure.

Objective

To ensure that all reports received are properly reviewed and investigated, in accordance with standards that safeguard all information and protect the individuals involved, as applicable.

Scope

This procedure applies to all personnel, including any third parties interacting with the company.

Supporting Background

To report any breach of the company internal documents—such as its Code of Conduct and Ethics, Internal Regulations on Hygiene and Safety (RIOHS), Policies, Procedures, Manuals, Guidelines, or any other internal document involving a regulatory violation or criminal offense (including those under Law No. 20,393)—the designated reporting channel is:

COMPANY	WHISTLEBLOWER CHANNEL
COSAYACH	denuncias@scmcosayach.cl

Definitions

- 1. Report:** The act of bringing a questionable behavior or situation to attention.
- 2. Unlawful Act:** Any irregular action or omission in violation of applicable laws, codes, regulations, policies, procedures, or standards.
- 3. Crime:** Any act or omission punishable by law.
- 4. Third Parties:** Any individual or organization associated with the company or its related companies.
- 5. Whistleblower Channel:** Designated email inboxes for reporting potential crimes or unlawful acts.
- 6. Reporting Form:** A tool designed to optimize the use of the whistleblower channel.
- 7. Whistleblower:** Any employee or third party who submits a report.
- 8. Reported Individual:** Any employee or third party associated with the company or its related companies who may have committed a crime or unlawful act.
- 9. Witness:** A person who observes or has knowledge of crimes or unlawful acts.
- 10. Business Days:** Monday through Friday, excluding Saturdays, Sundays, and public holidays.
- 11. Chain of Custody:** A system for handling evidence that prevents tampering, substitution, or destruction of proof and/or evidence related to a crime.
- 12. Sequential Case Number:** A unique reference number assigned to each report for identification purposes.
- 13. Evidence:** Any item that can be presented during an investigation to support the existence of a crime, fact, or circumstance.
- 14. Sanction:** The consequence of committing a crime or unlawful act, which may include verbal or written warnings, termination of employment, or judicial penalties such as imprisonment and/or fines.

Roles and Responsibilities

1. Role of Employees and/or Third Parties as Whistleblowers

- Understand and comply with the Crime Prevention Model and all related documents.
- Promptly report any unusual situation, unlawful act, or crime.
- Provide as much accurate and unaltered information as possible.
- Cooperate and contribute relevant background information during the investigation process.
- Submit any supporting evidence that may assist in the investigation.
- It is strictly prohibited to inform the subject(s) of the report or any third party about information related to an ongoing investigation.

2. Role of the Compliance Officer (Whistleblower Channel Manager)

- Gather background information to determine whether an investigation should be initiated.
- Investigate all reports received.
- Refer complex cases to specialized departments or senior management for review.
- Prepare a report with conclusions, including recommendations and an action plan.
- Provide management and/or the Board of Directors with updates on reports, their status, and outcomes.
- It is strictly prohibited to inform the subject(s) of the report or any third party about information related to an ongoing investigation.
- Rely on internal audits, as appropriate, or engage external auditors to support the investigation and analysis of reported matters.

3. Role of Internal Audit

- Support the investigation of reports when requested by the Whistleblower Channel Manager or senior management, especially in cases involving high-level personnel or requiring expedited review.
- It is strictly prohibited to inform the subject(s) of the report or any third party about information related to an ongoing investigation.

4. Role of the Payroll Manager or Equivalent

- Implement disciplinary measures internally defined, when applicable.
- File relevant background information and sanctions in the employee's personnel record.
- It is strictly prohibited to inform the subject(s) of the report or any third party about information related to an ongoing investigation.

5. Role of the Legal Advisor or Legal Department

- Provide legal guidance on labor regulations or any applicable civil, criminal, or other legislation related to the individuals involved in the respective investigation(s).
- Advise the Whistleblower Channel Manager on the investigation and analysis of reports when necessary or requested.
- It is strictly prohibited to inform the subject(s) of the report or any third party about information related to an ongoing investigation.

6. Role of the IT Department

- Ensure the proper functioning of email accounts used as whistleblower channels.
- Safeguard the security, integrity, and confidentiality of email communications and folders used to store investigation-related information.
- Alert the organization to any unauthorized access or sabotage of the reporting channels or storage folders.
- Provide technical support during investigations through IT systems.
- Assist in obtaining and/or preserving digital evidence within the chain of custody.

7. Role of the General Manager

- Provide the necessary resources, authority, and broad access required for the Compliance Officer to carry out investigations.
- Stay informed about the reports received, including their status and outcomes.



Description of the Procedure for Use, Receipt, and Investigation of Reports

1.1. Reporting Stage

1. Any employee or third party associated with the company or its related companies who wishes to report an unlawful situation may do so through the designated whistleblower channel via the following email address:

denuncias@scmcosayach.cl
2. The whistleblower will have access to a reporting form available on the company website, which must be completed and sent to the email address mentioned above. If the whistleblower chooses not to use the form, they must provide a detailed description of the facts and any supporting information available, including:
 - Contact information (in case additional details are needed)
 - Estimated date of the reported incident(s)
 - Location where the incident(s) occurred (e.g., Management Office, branch, etc.)
 - Individuals involved (e.g., directors, managers, employees, suppliers, clients, etc.)
 - Names, positions, and departments of those involved.
 - Type of violation, unlawful act, or crime
 - How the whistleblower became aware of the situation
 - Duration of the reported incident(s)
 - Related details (e.g., presence of witnesses, willingness to cooperate, etc.)
 - Whether the situation has been reported to someone else (include name and approximate date)
 - Any recommendations on how to best approach the investigation.
 - Supporting documentation (e.g., photos, videos, audio recordings, invoices, emails, etc.)
 - Any other relevant information that may assist the investigation
3. The whistleblower may choose to remain anonymous or provide their identity to be contacted if necessary. If the whistleblower opts for anonymity, they must include as much supporting information as possible. Otherwise, the investigation may be closed due to insufficient evidence.
4. The identity of the whistleblower will be kept confidential during and after the investigation, except in cases where a court order requires disclosure of the whistleblower's identity and/or that of the individuals involved.
5. Under no circumstances will the company tolerate any form of retaliation—regardless of the company, department, position, or level of authority—against any individual who, in good faith, submits a report.

1.2. Stage: Receipt of the Report

1. Once the report is received, the Whistleblower Channel Manager will acknowledge receipt to the whistleblower and assign a unique sequential case number for identification and follow-up purposes. The manager will then assess whether:
 - (i) An investigation should be initiated. If not warranted—due to misuse of the whistleblower channel or lack of sufficient information—the whistleblower will be notified via email. The whistleblower may appeal by submitting additional supporting information for reconsideration.
 - (ii) If the report warrants an investigation, the Whistleblower Channel Manager will determine whether specialized support is needed (e.g., legal counsel, Payroll Manager, etc.).
2. For traceability and audit purposes, the Whistleblower Channel Manager will assign a sequential case number to every report received, even if the report is deemed misuse of the channel or is closed due to insufficient information.
3. Each report and all related documentation or files will be stored in a restricted-access SharePoint folder, accessible only to the Whistleblower Channel Manager.
4. The Whistleblower Channel Manager will have 30 calendar days to respond to the report. This period may be extended by an additional 30 calendar days, with prior notice to the whistleblower.
5. All stages of the reporting process will be supported by internal annexed documents.

1.3. Stage: Investigation of the Report

1. Once the report has been received and the background information reviewed, and it is confirmed that an investigation should proceed, the Whistleblower Channel Manager will take the following actions:
 - a) Complete the “Report Registration” annex and assign a sequential case number.
 - b) Create a restricted-access SharePoint folder named after the case number.
 - c) Store all communications, files, and case-related information in the folder.
2. Upon initiating the investigation, the “Investigation Report” annex must be progressively completed, entering all available data and updating it as the investigation progresses.
3. If the report lacks sufficient information to proceed, the whistleblower will be asked to provide additional details. If no response is received within 30 days, the Whistleblower Channel Manager will close the case and notify the whistleblower. However, the whistleblower may resume the report at any time upon obtaining new evidence.
4. To gather all necessary background for the investigation, the Whistleblower Channel Manager may summon involved parties to provide statements and request any information deemed necessary. If interviews are conducted, a record must be kept using the “Interview Record” form. The signed document must be stored in the case’s SharePoint folder.
5. Regarding interviews and statements from involved parties (i.e., the Whistleblower, Witnesses, and the Reported Individual), the Whistleblower Channel Manager and any investigator supporting complex cases must ensure the confidentiality of the proceedings and the content of the statements.



6. In interviews with the Whistleblower, Reported Individual, and Witnesses, the investigator must inform them of their right to submit any documentation that supports the statements made in their declaration.
7. The Whistleblower Channel Manager may appoint an investigator for complex cases. This investigator may come from the Legal Department, IT, Payroll, or other relevant areas. They must sign the “Investigator Confidentiality Statement” annex, which will be stored in the case’s SharePoint folder.
8. If the Reported Individual admits to or the facts are confirmed, the Whistleblower Channel Manager will recommend in the Investigation Report that the corresponding management impose the appropriate sanction on the employee, or third party involved.
9. The investigation must include at least the following activities:
 - Collection of information related to the reported incident.
 - Interviews with involved personnel.
 - Analysis of the information gathered.
 - Documentation of the investigation (evidence collected) and results.
 - Conclusions based on the investigation.
 - Recommended corrective actions.
10. The Reported Individual must be informed of the allegations and given the opportunity to respond before the investigation concludes (unless it is not possible to contact the individual and there is clear evidence justifying immediate dismissal).
11. The investigation must be completed within 30 business days. If necessary, this period may be extended by an additional 30 calendar days, during which the investigation must be concluded.

LEGAL ACTIONS INITIATED BY THE COMPANY AND ITS AFFILIATED COMPANIES

Without prejudice to the sanctions established under Law No. 20,393 or those outlined in the “Disciplinary Action Policy of the company”, the company and its affiliated companies reserve the right to initiate legal proceedings—civil, criminal, administrative, or of any other nature as applicable—for the investigation and/or reporting of the facts, to hold the offender and/or third parties accountable, and/or to recover losses incurred and/or seek compensation for damages caused to the company and its affiliated companies.

INTERNAL VIOLATIONS AND SANCTIONS

All policies, procedures, manuals, guidelines, or other internal documents are mandatory for employees of the company, its affiliated companies, and/or third parties—particularly managers, executives, and staff. Non-compliance with this procedure or any internal document, law, or regulation will result in the application of one or more of the sanctions outlined in the “Disciplinary Action Policy of the company”:

Training or Advisory Session

Aimed at helping the employee improve their understanding and interpretation of a document or regulation. The training will be documented via an email from the Manager to the employee.

Verbal Warning

The direct Manager will inform the employee of the expected behavior and explain how their conduct deviated from established standards and/or violated policies and procedures.

Written Warning

The direct Manager, together with the Payroll Department, will issue a formal written warning describing the violation and the corrective actions expected from the employee. The warning may be copied to the Labor Directorate and will always be documented and filed in the employee’s personnel record.

Termination of Employment

The direct Manager, in coordination with the Payroll Department, will decide on the termination of the employment contract based on the severity and/or recurrence of the violation. The Payroll Department and Legal Department must always be involved in this process and in the final decision.

REPORTING WITHOUT RETALIATION

As stated in its Code of Conduct and Ethics, the company and its affiliated companies do not tolerate any form of retaliation. This policy applies to all individuals who, in good faith, report a real or perceived violation of internal documents of the company and its affiliates, including but not limited to: the Code of Conduct and Ethics, Internal Regulations on Hygiene and Safety (RIOHS), Policies, Procedures, Manuals, Guidelines, or any other internal document involving a regulatory breach or criminal offense, including but not limited to Law No. 20,393. This zero-tolerance policy also extends to individuals who cooperate in investigations conducted by the company and its affiliated companies. The company expects all employees to feel free to raise concerns, ask questions, or seek guidance without fear of retaliation. Any employee who engages in retaliatory actions will be subject to disciplinary measures, which may include termination of employment. If an employee believes they have been retaliated against, they must contact the Compliance Office to report the situation. The following actions are considered retaliatory when taken in response to an employee reporting a real or perceived violation or cooperating in an investigation:

- Dismissal, suspension, or demotion
- Denial of any legitimate Benefit
- Threatening or demeaning treatment
- Conditioning promotions, salary increases, or bonuses on silence
- Assigning unrealistic goals or expectations
- Removing the employee from a project
- Reducing project-related working hours
- Excluding the employee from team meetings

RESPONSIBILITIES OF EXECUTIVES AT THE COMPANY AND ITS AFFILIATED COMPANIES

Executives at the company and its affiliated companies must ensure proper compliance by:

- (i) Communicating the requirements of this policy to all employees under their supervision; and
- (ii) Implementing the necessary controls outlined in this policy within their respective business areas.

INVESTIGATION RECORDKEEPING

The Whistleblower Channel Manager will maintain an up-to-date and confidential record of all reports and investigations (both ongoing and closed), as well as any disciplinary measures applied in relation to non-compliance. All documentation and follow-up will be stored in SharePoint, and monthly reports will be submitted to the General Manager and/or Board of Directors, detailing the status and outcomes of the reports.

EVIDENCE MANAGEMENT

Internal documentation will be used to manage evidence, allowing for proper tracking of the chain of custody and transfer of evidence throughout the investigation process.

CLOSURE AND MONITORING

Internal control measures will be adopted to prevent recurrence of confirmed misconduct. If the reported facts constitute a criminal offense and the disciplinary measures outlined in the “Disciplinary Action Policy of the company” are deemed insufficient, the company and its affiliated companies may forward the case to the relevant authorities and initiate appropriate legal action.

PROCEDURE REVIEW AND MODIFICATION

This procedure will be reviewed every two (2) years from its effective date by the Whistleblower Channel Manager, who will propose any necessary substantive or formal changes.

For any questions, requirements, or concerns regarding the application of the Whistleblower Channel Procedure of the company, please contact the Compliance Officer or email: cumplimiento@grupoerrazuriz.cl

