



EMPRESAS **TAYLOR**

Anti Corruption Policy

Política Anticorrupción

Version No. 02, June 2024

Ref.: SDC-ACP-202405

IMPORTANT INFORMATION ABOUT THIS DOCUMENT

- **Document Identification:** Anti Corruption Policy
- **Author:** Fernando Valenzuela Rasmussen / Raven Legal
- **Reference:** SDC-ACP-202405
- **Approval Date of Current Text:** 2 November 2023
- **Title of the Standard:** Code of Ethics or Código de Ética
- **Effective Date:** 1 June 2024
- **Geographical Scope:** Global
- **Approval Body:** Board of Directors
- **Standards Developed:**
 - Criminal Compliance System – Sistema de Compliance Penal
 - Whistleblowing System – Sistema del Canal de Denuncias
 - Code of Ethics – Código de Ética
 - Crime Prevention Models of Chile, Peru, Ecuador, Bolivia, and Colombia.
- **Document Name:** Anti Corruption Policy
- **Document Code:** No. 1/2024
- **Current Version:** 2.0
- **Last Update Date:** 29 May 2024

Document Change Control
Nombre del Documento: Política Anticorrupción

Código del Documento: N°1/2024

Versión Actual: 2.0

Fecha de Última Actualización: 29 de mayo de 2024

Version History

Version	Date	Description of Changes	Author	Reviewed	Approved	Date
1.0	5 may 2023	Creation of the initial document.	Fernando Valenzuela Rasmussen fvalenzuela@ravenlegal.cl	Sustainability and Compliance Officer smackenzie@ianta...	Board of Directors	30 abr 2023
2.0	5 jun 2024	<p>The policy name was changed from 'Global Anti-corruption Compliance Policy' to 'Anti Corruption Policy'. The document was also updated in accordance with Law 21.595 on Economic Crimes and changes in the Company's Organizational Structure. The main adjustments include:</p> <ul style="list-style-type: none"> ● Simplification of Sections: Reduction of redundancies and reorganization of compliance content. ● Update of Terms: Review of terms and definitions to reflect legal changes. ● Procedural Adjustment: Modification of protocols to align with new legal provisions. ● Integration of Updated Standards: Alignment with recent legal changes. <p>These changes ensure the document is up-to-date and compliant with current legislation and the Company's context</p>	Fernando Valenzuela Rasmussen fvalenzuela@ravenlegal.cl	Sustainability and Compliance Officer smackenzie@ianta...	Sustainability and Compliance Officer	5 jun 2024

Proactive Implementation Note according to Law No. 20.393 and Amendments by Law No. 21.595: For the purposes of this document, reference is made to Law No. 20.393, amended by Law 21.595, which will be effective from August 2024. As part of our Crime Prevention Model and Compliance System, we have proactively initiated the implementation of these amendments. This anticipation ensures alignment with the new legal provisions without contravening current criminal legislation. We will continue to adjust our internal regulations to fully comply with current and future legal requirements, reaffirming our commitment to regulatory and ethical compliance.

Table of Contents

Anti Corruption Policy.....	1
1. Introduction.....	4
2. Purpose.....	5
3. Objective.....	5
4. Scope and Application.....	5
5. Guidelines and Comprehensive Protection.....	6
6. Management System for Corruption Prevention.....	6
a. Management of Corruption Risks.....	6
b. General Principles.....	6
i. Conducts.....	8
1. Fraudulent Practices or Deceptive Promises.....	8
2. Facilitation Payments.....	8
3. Political Contributions.....	9
4. Classified Information.....	10
5. Trade Secrets.....	10
9. Financial and Non-Financial Controls.....	11
10. Anti-Money Laundering and Counter-Terrorism Financing.....	12
11. International Trade.....	12
7. Control, Monitoring, and Supervision.....	13
8. Control, Monitoring, and Supervision.....	13
9. Approval, Validity, and Updating.....	13

Anti Corruption Policy

Política Anticorrupción

NOTE: The [Definiciones Generales en la Normativa Interna](#) includes the definitions of terms frequently used in the Company's Compliance Internal Regulations.

1. Introduction

Corruption and fraud not only represent serious obstacles to economic development and democratic stability but also undermine social justice and the rule of law, negatively impacting the economy and society. Furthermore, these illicit acts often facilitate the operations of organized crime. In this context, Empresas Taylor S.A., committed to the highest standards of ethics and honesty, plays an active role in combating corruption and fraud in all areas of its operations.

Empresas Taylor has implemented a Code of Ethics, approved by its Board of Directors, which, in its section 5.3, underscores the commitment to complying with laws and regulations at all times as a fundamental part of its ethical conduct.

The **Anti Corruption Policy** of Empresas Taylor (the "Policy" or "Anti Corruption Policy") is a clear expression of the Company's commitment to ethics and transparency in the fight against corruption, both in internal operations and external relations. This policy not only reflects the regulations that must be followed but also highlights prohibited actions, whether direct, indirect, or executed through third parties.

This Policy is a key element of the **Criminal Compliance System** (SDC, by its initials in Spanish) of Empresas Taylor S.A. and must be known and applied by all entities and persons associated with the Company. Its implementation and adherence are crucial both internally and in external relations, and it should be understood as an essential tool to prevent the Company and other individuals within the scope of this Policy from engaging in conduct that may violate not only legal provisions but also the fundamental principles of conduct. Therefore, this Policy regulates actions, indicating those prohibited, whether carried out directly or indirectly or through intermediaries.

2. Purpose

This policy conveys to shareholders, executives, employees, and third parties a clear message of rejection of fraud and corruption in all its forms. Empresas Taylor is committed to combating these practices by establishing communication and awareness mechanisms to foster a culture of honesty and corporate responsibility.

3. Objective

The objective of Empresas Taylor S.A.'s Anti Corruption Policy is to foster a culture of prevention and establish a zero-tolerance policy towards corruption and fraud. This policy sets the necessary criteria and principles for implementing organizational, technical, and disciplinary measures that ensure effective internal control in the fight against corruption and fraud in all areas of the Company. The goal is to ensure that all operations of Empresas Taylor are conducted within a framework of integrity, complying with applicable laws and regulations.

4. Scope and Application

The Anti Corruption Policy has a broad scope and application to ensure the effective prevention of criminal conduct within and outside the Organization. Its main areas of application include:

1. **Extension to the Entire Group:** The policy applies to all group companies, including those without operational autonomy and those under direct influence of the group due to ownership or participation relationships.
 - a. **Mandatory Compliance:** It is mandatory for all companies within the group. Each entity within the "Perimeter" must formally adhere to this policy and designate a Local Crime Prevention Officer (Local Compliance Officer, LCO) for local management.
 - b. **Flexibility for Entities Outside the Perimeter:** Entities outside the direct control of Empresas Taylor S.A. can develop their own policies against corruption or fraud, adapted to their specific contexts, as long as these are consistent with the principles of this Policy and the other policies of the SDC. Additionally, when other policies, standards, or specific sector principles or derived from national legislation apply to members of the Society and other companies in the Group, they must also comply with them, ensuring consistency with this Policy and be communicated to the Sustainability & Compliance Officer (**SCO**) of Empresas Taylor S.A. This flexibility extends to joint ventures and other associations where Empresas Taylor or its subsidiaries have management, promoting the adoption of these anti corruption principles where possible.
 - c. **Universal Applicability within the Organization:** All members of the group, in all roles, functions, or positions, are required to comply with this policy.
 - d. **Inclusion of Third Parties:** The policy also extends to third parties such as associated persons and stakeholders handling matters on behalf of the Organization, acting with or without official representation.
 - e. **Coverage of Activities and Processes:** It applies to all activities and processes carried out by Empresas Taylor and its related entities.
 - f. **Compliance Function:** The Compliance Function of Empresas Taylor will ensure consistency between the group's policies and practices with the standards established in the anti corruption policy.
 - g. **Promotion of Prevention Programs:** The implementation of crime prevention programs will be promoted both in group companies and in external entities.
 - h. **Applicability to Business Collaborations:** This policy also applies to business collaboration agreements in which Empresas Taylor participates, ensuring its compliance in all relevant operations and businesses.

5. Guidelines and Comprehensive Protection

The Policy establishes **principles and guidelines** to ensure compliance with applicable anti-corruption laws, both internally and in relations with third parties. The main objectives of this policy include:

1. Adopting a **zero-tolerance** stance towards any form of corruption.
2. Reinforcing the Company's **commitment** to integrity and adherence to high ethical and legal standards.
3. **Complementing** the existing Compliance System to prevent corruption.
4. Establishing **strong ethical standards** to protect the Company's reputation.
5. **Identifying, evaluating, and managing criminal risks** associated with corruption.
6. Implementing **control measures** to prevent and mitigate corruption.
7. **Prohibiting corruption** in all operations and business activities.
8. Fostering a **corporate culture of criminal compliance** through the implementation of best practices and standards of responsible business conduct.
9. **Protecting** the Company, its members, and associated third parties through the effective prevention, detection, and response to criminal corruption risks.
10. **Ensuring** that all business activities are conducted in accordance with this policy and in full compliance with relevant national and international laws.

6. Management System for Corruption Prevention

Empresas Taylor maintains a firm commitment to the highest ethical and legal standards, rejecting any form of corruption, whether direct or indirect, and avoiding any activity contrary to its Anti Corruption Policy and applicable

laws. The Company is committed to consistently applying the rules and principles of this Policy, aligned with its SDC and Code of Ethics. The Company commits to continuously monitoring the legislation in the jurisdictions where it operates and international anti-corruption standards to keep its policies updated. The Compliance Function is responsible for adapting these policies in response to any regulatory changes, both locally and globally, as appropriate.

a. Management of Corruption Risks

The Compliance Function of Empresas Taylor, as defined in the Compliance Function Regulation, plays a crucial role in proactively managing corruption risks. This function operates in line with the Control Environment established in the Criminal Compliance Policy. This approach ensures that the Company not only effectively identifies and mitigates corruption risks but also continually maintains and strengthens an adaptive internal control framework aligned with best practices and current legal and regulatory standards.

b. General Principles

1. Zero Tolerance for Corruption and Fraud

- a. Empresas Taylor adopts a zero-tolerance stance towards corruption and fraud, as explicitly stated by its Governing Bodies in this Policy. Organization Members are expressly prohibited from engaging in acts of corruption, including extortion, bribery, or fraud in any context of their professional activity, whether in interactions with public or private entities. This zero-tolerance principle is absolute and takes precedence over any economic or commercial benefit that may arise from irregular or illicit practices.
- b. The Company rejects the use of any inappropriate or improper practices to obtain illicit or irregular economic benefits or commercial advantages. This applies even if such actions could be considered beneficial to the Organization or personally to its members and/or related third parties. Additionally, the misuse of economic and/or commercial information for illicit or fraudulent purposes is prohibited, requiring strict confidentiality and protection of the secrecy related to such information.

2. No Acceptance or Offering of Gifts:

No member of Empresas Taylor is authorized to accept or offer awards, gifts, gratuities, hospitality, or special treatments intended to obtain an economic or commercial benefit, whether directly or indirectly. All such requests or offers must strictly comply with the company's Corporate Gifts and Hospitality Policy.

3. Proactive and Preventive Prevention

- a. Empresas Taylor implements a proactive prevention program focused on preventing, detecting, and responding to corruption and fraud risks, applying timely measures to prevent corrupt practices and fraud within the Group as established in the Compliance Function Regulation and the Compliance Policy. The Company will ensure that internal regulations, practices, and procedures comply with applicable anti-corruption regulations and will disseminate and inform about any relevant legislative updates that come into effect.
- b. Operational Management will be responsible for developing, implementing, and communicating the necessary procedures, processes, and controls for this purpose. Additionally, the Human Resources Unit will have the authority to apply the required disciplinary measures in case of non-compliance with this Policy.

4. Duty to Report

- a. It is the obligation of each member, as well as business partners and third parties with a direct relationship and a legitimate commercial or professional interest, to report any violation of this Policy or doubts about practices that may constitute acts contrary to the established norms. To make a report, the following Reporting Channels must be used:

1. **Email:** compliance@empresastaylor.com
2. **Postal Address:** Blanco 937, Office 601, Valparaíso, Chile.
3. **Phone:** +56994699147.
4. **Meetings:** Request a face-to-face or virtual meeting.
5. **As established in the MPDs, as applicable.**

- b. These channels ensure that all concerns are addressed confidentially and effectively, reinforcing the company's commitment to integrity and regulatory compliance. The information transmitted

through this Channel is confidential, and the identity of the whistleblower is protected to the extent possible and permitted by the relevant country's laws. The Organization appreciates the collaboration and guarantees the absence of reprisals. The person responsible for managing each Prevention Model locally must be aware of any potential violation of this Policy or applicable legislation to address the issue quickly and effectively; they may act on their initiative to investigate any indication of non-compliance with this Policy.

5. **Transparency and Legality:** Empresas Taylor S.A. commits to maintaining the highest possible transparency and adherence to legality in all its financial and accounting operations. Financial information, accounting, contracts, and all auxiliary documentation must strictly comply with current legislation, ensuring that all records accurately, integrally, and truthfully reflect the reality of the transactions and information presented. False or misleading entries or records will not be tolerated. Likewise, any records or documents from business partners or third parties that do not comply with current legislation and formal requirements will be rejected. Empresas Taylor insists on the importance of these practices not only to comply with regulations but also to foster a corporate environment of trust and ethics in all its activities.
6. **Compliance by All Third Parties**
 - a. Empresas Taylor establishes that all Organization Members must interact with Public and Private Institutions and Organizations lawfully and respectfully. According to this guideline, facilitating or expediting payments, in cash or otherwise, to any judicial body, public administration, or official organization is strictly prohibited.
 - b. The Company's policy also states that Empresas Taylor's financial resources cannot be used for political purposes, including supporting candidates or political parties of any ideology. However, donations to charitable organizations and sponsorship of legitimate events are allowed, provided they comply with the rules established in the **Corporate Donations and Sponsorship Policy** (Política Corporativa de Donaciones y Patrocinios), with the express agreement of the SCO.
 - c. Relations with authorities and public officials, as well as private entities, must strictly adhere to the **Corporate Relations Policy with Authorities and Public Officials and Private Entities** (Política Corporativa de Relaciones con Autoridades y Funcionarios Públicos y Entidades Privadas), ensuring compliance and integrity in all institutional interactions.
7. **Guarantee of Indemnity**
 - a. Empresas Taylor assures all those it relates to, including Organization members and third parties, that they will not face any reprisals or harassment, whether disciplinary or moral, for reporting incidents based on indications of the truth about illegal, illicit, irregular acts or those contrary to the principles of Empresas Taylor's Code of Ethics.
 - b. All communications made in good faith will be considered a valuable contribution to achieving the organization's objectives. On the other hand, in situations where communications are based on false or misleading data, the Organization will act according to the Corporate Ethical Channel Procedure, ensuring fairness and justice in handling these incidents. This policy reinforces Empresas Taylor S.A.'s commitment to transparency and ethics in all its operations.
8. **Training and Awareness**
 - a. Training in regulatory compliance is essential for Empresas Taylor. To foster a culture of compliance and integrity, general training and information programs will be implemented to disseminate and reinforce the principles established in this Policy, the Code of Ethics, and the company's Integrity Policies.
 - b. Additionally, specific training actions will be directed at job positions and areas of special sensitivity where the risks of regulatory and ethical non-compliance are more significant. These sessions will focus on the relevant regulatory and ethical aspects of each function, ensuring that all members of the Organization are well-informed and equipped to handle any situation that may arise in the context of their specific responsibilities.

i. **Conducts**

1. **Fraudulent Practices or Deceptive Promises**

Fraudulent practices involve dishonest and deceitful behavior aimed at exploiting situations for personal gain, causing negative impacts on other Organization members and the Company itself. Such practices can include acts like insider trading, manipulation of records, or embezzlement of funds.

Deceptive promises are characterized by being made without the necessary guarantees for fulfillment or by individuals lacking the authority or capacity to make binding decisions. These promises can create false expectations and result in internal damages and harm relationships with third parties.

To ensure integrity and transparency in all its operations, Empresas Taylor has established the following criteria:

1. **Transparency in All Operations:** The Company commits to acting transparently across all its geographic locations, ensuring clear and accurate disclosure of relevant information and consistent accountability.
2. **General Contracting Conditions:** Obligatory for both Organization members and suppliers, these conditions specify the terms and requirements for all commercial transactions, ensuring fairness and protecting the interests of all parties involved.
3. **Prior Authorization for Contracts and Operations:** Execution of contracts or operations without the company's due authorization is prohibited. This ensures that all actions align with company policies and objectives, avoiding legal, financial, or reputational risks.
4. **Channels for Concerns and Claims:** Specific channels are available for related third parties to safely and confidentially express their doubts, suggestions, complaints, and claims. These channels ensure proper management, timely responses, and implementation of necessary corrective measures.

2. Facilitation Payments

Empresas Taylor establishes a strict policy against facilitation and extortion payments, clearly defining actions and responsibilities to prevent and address these practices.

1. **Definition and Prohibition of Facilitation Payments:** Facilitation payments, also known as "grease payments" or "gratuities," are improper payments made to public officials to expedite routine procedures to which the payer is already entitled. These payments are a form of bribery and are strictly prohibited within our Organization.
2. **Definition and Handling of Extortion Payments:** Extortion payments involve delivering money under threat, force, or extortion, endangering the integrity, life, or freedom of those involved. Although these payments are also prohibited, exceptions are recognized in situations where an employee's physical safety is at risk.
3. **Conditions for Handling Exceptions:** In exceptional circumstances where an extortion payment is necessary to protect an employee's physical integrity or life, it must:
 - a. Be authorized in advance by the SCO or LCO, as appropriate, provided it is not prohibited by local legislation.
 - b. Be properly recorded in the company's books and accounting records.
4. **Procedures in Case of Payment Requests:**
 - a. **Facilitation Payments:** Upon a facilitation payment request, evidence of legitimacy and an official receipt must be requested. If sufficient proof is not provided, the payment must be rejected.
 - b. **Extortion Payments:** In cases of direct threats to safety or freedom, the payment should proceed only after the SCO or LCO authorizes it and records all event details.
5. **Recording and Reporting:**
 - a. All incidents related to facilitation or extortion payment requests must be reported immediately to the SCO or LCO.
 - b. A detailed record of any payments made under these circumstances must be kept.
 - c. If required by law, the payments must be reported to the relevant authorities.
6. **Internal Communication and Disciplinary Measures:**
 - a. The compliance function will communicate the measures adopted in cases where facilitation or extortion payments have been made, potentially including an internal investigation.
 - b. Actions taken could include disciplinary measures to ensure continued compliance with this policy.

3. Political Contributions

Empresas Taylor, along with its Organization Members and Associated Persons, adopts a strict stance regarding political contributions to ensure transparency and compliance with applicable legislation. This policy outlines guidelines for managing such contributions and the requirements for their proper execution.

1. General Guidelines

- a. **Prohibition of Contributions for Bribery Acts:** Organization Members and Associated Persons are prohibited from making monetary or other contributions to political parties, candidates, or individuals engaged in politics that could be perceived as a means to cover up acts of bribery.
- b. **Transparency and Legal Compliance:** All political contributions must be transparent and strictly comply with current legislation, ensuring they are not made to obtain favorable treatment for the Company.

2. Exceptions and Approval

- a. **Exceptional Circumstances:** In exceptional situations where the Company deems it pertinent to make political donations, these must:
 - i. Support and promote the democratic process without attempting to financially favor political parties.
 - ii. Obtain prior approval from the BOD, with recommendations from the SCO or LCO and the CEO or Country Manager, as appropriate.

3. Specific Requirements for Contributions

- a. **Review of Contributions:** Contributions must be carefully reviewed to ensure they are not used as a facade for corrupt acts.
- b. **Use of Charitable Donations and Sponsorships:** Charitable donations and sponsorships must not be used to cover up illicit acts. They must be transparent and comply with all applicable regulations.
- c. **Controls and Procedures:** Adequate controls will be established to prevent improper political or charitable contributions, especially in organizations involving prominent political figures or their associates.

4. Actions of Organization Members

- a. **Commitment to Transparency:** Members are expected to act transparently, avoiding any form of illegal payment or commission to political parties in all their activities.
- b. **Personal Contributions:** Members can make personal contributions to political parties or candidates, including voluntary services outside working hours and without using Company resources, provided these do not contravene established guidelines.
- c. **Donations to Affiliated Foundations:** Donations to foundations related to political parties will be limited to projects aligned with Empresas Taylor's strategy and duly authorized according to this policy.

4. Classified Information

Empresas Taylor is committed to protecting and adequately managing all classified information, including confidential, privileged, secret, and internal data, to safeguard the interests of the Company and its stakeholders.

1. Types of Classified Information

- a. **Confidential Information:** Includes data whose unauthorized disclosure, loss, or destruction could result in significant financial losses, reputational damage, or litigation. This encompasses strategic, financial, customer, and supplier information, among other sensitive data.
- b. **Privileged Information:** Characterized by its confidential nature and the fact that it provides a competitive advantage. Its handling is strictly regulated by securities market regulations.
- c. **Secret Information:** Highly confidential information whose disclosure could have severe consequences for the company's financial and competitive position.
- d. **Internal Information:** Although confidential, it has a limited impact compared to secret information but still requires appropriate protection measures.

2. Responsibilities and Handling

- a. **Confidentiality Obligation:** All Organization Members are obligated to maintain the confidentiality of classified information accessed during their duties.
- b. **Prohibition of Unauthorized Transactions or Disclosures:** Transactions or disclosures of classified information to third parties without the company's express authorization are prohibited.
- c. **Restricted Access:** Access to confidential and secret information is limited to individuals whose functions require it, as well as external collaborators under confidentiality agreements.

3. Protection Measures:

- a. **Implementation of Physical and Electronic Controls:** Measures to prevent unauthorized access to classified information.

- b. **Periodic Audits:** Conduct audits to ensure the integrity and security of information.
- c. **Clear Disciplinary Processes:** For those who violate information handling policies.

4. Transparency and Legal Compliance

- a. **Promotion of Transparency:** In internal and external relationships, respecting the limitations of sensitive information disclosure.
- b. **Strict Compliance:** With local regulations on the handling and disclosure of privileged information and other applicable regulations.

5. Disclosure and Transmission of Information: On revealing, transmitting, or disseminating classified information without company authorization, except under corresponding legal, administrative, or judicial disposition.

5. Trade Secrets

The policy aims to ensure the security of sensitive commercial information and prevent criminal acts related to its unauthorized disclosure or misuse.

6. Definition of Trade Secret¹: A trade secret is defined as any undisclosed information under the company's control used in productive, industrial, or commercial activities. This information must:

- a. Not be generally known or easily accessible.
- b. Have commercial value due to its secrecy.
- c. Be protected by reasonable measures to keep it secret.

7. Categories of Violations:

- a. **Intrusion:** Unauthorized access to a trade secret to disclose or economically exploit it. Intrusion includes:
 - i. Entering Company premises or using technical devices to capture visual or audio information inside the premises that would not be perceivable from outside without such devices or overcoming obstacles.
 - ii. Capturing visual or audio content of a conversation or activity where participants expect confidentiality concerning the Company.
 - iii. Unauthorized access to a computer system or exceeding authorized access and overcoming technical or security measures.
- b. **Disclosure of Trade Secrets (Confidentiality Breach):** Disclosure of a trade secret without the legitimate possessor's consent or allowing another person to access it through employment or professional relationship.
- c. **Exploitation of a Trade Secret Without Consent:** Using a trade secret for economic gain without the owner's consent, obtained through a duty of confidentiality or contractual or employment relationship with the affected Company or another service provider.
- d. **Exception:** Use of legitimately acquired experience and skills in knowing a trade secret does not constitute a breach.
 - i. **Protection Measures**
 - e. **Access Control:** Restrict access to sensitive information to those with a legitimate need to know.
 - f. **Security Measures:** Implement physical and digital security to protect secret information.
 - g. **Training and Education:** Regular training programs to educate employees on the importance of protecting trade secrets and the legal consequences of unauthorized disclosure.
 - h. **Obligations of Organization Members:** Employees must strictly adhere to this policy and avoid any form of trade secret violation. Any violation may result in severe disciplinary sanctions, including dismissal and legal actions under the new legislation.

¹To understand what is meant by a Trade Secret, the new Article 284 sexies of the Chilean Penal Code links it to the provisions of Law No. 19,039, which establishes rules applicable to industrial privileges and protection of industrial property rights. In this sense, this Economic Crimes Law states in its Article 86 that a "trade secret" shall mean:

"[...] any undisclosed information that a person possesses under their control and can be used in any productive, industrial, or commercial activity, provided that such information meets the following cumulative requirements:

"[...] It is secret in the sense that it is not, as a whole or in the precise configuration and assembly of its components, generally known or easily accessible to persons within the circles where such information is normally used [...]".

"[...] It has commercial value because it is secret [...]".

"[...] It has been subject to reasonable measures taken by its legitimate holder to keep it secret [...]"

8. Professional Secrecy

Violations by public officials seeking personal or third-party economic gain by using specific confidential information are considered particularly serious. If a Company member or related third party, especially if a legally recognized lawyer or law firm, uses this secret or confidential information to favor the company's position to the detriment of another client, or vice versa, harming any involved party, it will be grounds for dismissal and termination of the contractual relationship as per the terms established in the professional's relationship with Empresas Taylor.

9. Financial and Non-Financial Controls

Empresas Taylor implements robust financial and non-financial controls to ensure transparency, integrity, and regulatory compliance in all its operations. The key measures adopted to strengthen the management and supervision of the company's activities are described below. The Company commits to continuously maintaining and improving these controls, ensuring adherence to best practices and applicable legislation. This comprehensive approach not only reinforces internal operations but also strengthens third-party trust in Empresas Taylor's management and ethics.

1. Financial Controls

- a. **Regular Audits:** Conduct periodic and independent internal and external audits to verify the accuracy and integrity of financial records.
- b. **Record Maintenance:** Ensure all accounting records are complete, reliable, and maintained in accordance with accepted accounting principles and current legislation.
- c. **Segregation of Duties:** Implement the principle of segregation of duties to prevent conflicts of interest and errors, ensuring that no single person has complete control over a financial transaction.
- d. **Approval Controls:** Require multiple signatures for payment approvals, especially for high-value transactions, with clearly defined authority levels.
- e. **Cash Use Restrictions:** Limit cash use and strengthen cash controls to minimize the risk of embezzlement.
- f. **Documentation and Verification of Transactions:** Require appropriate documentation to support all payment authorizations and verify the legitimacy of beneficiaries and contracted services.

2. Non-Financial Controls

- a. **Procurement and Operations Management:** Implement competitive bidding processes to ensure transparency and fairness in contract awards.
- b. **Evaluation of Group Services:** Rigorously evaluate the necessity, legitimacy, and compliance of services provided by group entities.
- c. **Contract Participation and Approval:** Require the signature of at least two authorized persons on contracts and relevant documents to ensure proper oversight and prevent conflicts of interest.
- d. **Protection of Bid Integrity:** Limit access to sensitive information such as pricing to authorized personnel only to protect the integrity of bids.
- e. **Senior Management Oversight:** Actively involve senior management in overseeing high-risk transactions, including those with potential for bribery.
- f. **Tools and Support for Staff:** Provide tools and templates such as practical guides, approval scales, and IT workflows to support staff in their functions.

10. Anti-Money Laundering and Counter-Terrorism Financing

Empresas Taylor implements a proactive framework program that establishes the principles and guidelines all Group entities must follow regarding the prevention of money laundering and terrorist financing.

1. Definitions:

- a. **Money Laundering:** Involves activities aimed at concealing or disguising the nature, origin, location, disposition, movement, or ownership of assets known to be derived from criminal activity.
- b. **Terrorist Financing:** Includes any form of provision or collection of funds intended for use in terrorist acts.

2. Principles of Action:

- a. **Prohibition of Illicit Operations:** No operations involving assets of criminal origin will be allowed, nor will the nature or ownership of such assets be concealed.

- b. **Regulatory Compliance:** Absolute commitment to comply with all current laws on preventing money laundering and terrorist financing.
- c. **Communication with Competent Authorities:** Obligation to report suspicious operations to the competent authorities immediately.
- d. **Internal Procedures:** Maintain robust internal procedures to prevent and detect activities related to money laundering and terrorist financing.
- e. **Training and Education:** All employees and executives will receive appropriate training on relevant policies and procedures.
- f. **Active Collaboration:** Full cooperation with authorities in preventing these criminal activities.

11. International Trade

Applicable to all maritime agency operations of Empresas Taylor and its subsidiaries in Chile, Perú, Ecuador, Bolivia, and Colombia. **International trade** is understood as any physical and financial movement of goods and services between nations, including logistics, transportation, and financial transactions.

- 1. **Policy Dissemination:** The policy is widely disseminated and accessible to all Organization Members through the intranet and the corporate website.
- 2. **Expectation of Adherence:** All Organization Members are expected to be well-informed, respect, and adhere to the contents of this policy. Business Partners are also expected to adopt behaviors aligned with the established principles.
- 3. **Commitment from Third Parties:** Third parties, including associated persons and stakeholders, are also expected to adopt behaviors aligned with the company's ethical principles and commit via a Commitment and Adherence Letter (Carta de Compromiso y de Adhesión).
- 4. **Immediate Response to Non-Compliance:** Empresas Taylor ensures an immediate response to any non-compliance with this policy, acting according to its internal regulations and within the parameters of current legislation to maintain integrity and compliance throughout the organization.

7. Control, Monitoring, and Supervision

The SCO of Empresas Taylor S.A. plays a crucial role in supervising the adequacy and effectiveness of the measures implemented in the SDC globally by the SDO and the LCO in their local control and monitoring, along with other Compliance Function officers.

- 1. The policy is widely disseminated and accessible to all Organization Members through the intranet and the corporate website.
- 2. All Organization Members are expected to be well-informed, respect, and adhere to the contents of this policy. Business Partners are also expected to adopt behaviors aligned with the established principles.
- 3. Third parties, including associated persons and stakeholders, are also expected to adopt behaviors aligned with the company's ethical principles and commit via a Commitment and Adherence Letter.
- 4. Empresas Taylor ensures an immediate response to any non-compliance with this policy, acting according to its internal regulations and within the parameters of current legislation to maintain integrity and compliance throughout the organization.

8. Control, Monitoring, and Supervision

The SCO of Empresas Taylor S.A. plays a crucial role in supervising the adequacy and effectiveness of the measures implemented in the SDC globally by the SDO and the LCO in their local control and monitoring, along with other Compliance Function officers.

9. Approval, Validity, and Updating

This Policy will come into effect on the date of its approval by the Board of Directors of Empresas Taylor. It is crucial to keep this Policy updated to reflect any changes in context. The SCO is responsible for evaluating and implementing any proposed modifications. If the proposed changes are deemed significant, they must be presented to the Board for approval.

