



EMPRESAS **TAYLOR**

Code of Ethics

Código de Ética

Version No. 02, June 2024

Ref.: SDC-CE-202405

IMPORTANT INFORMATION ABOUT THIS DOCUMENT

- **Document Identification:** Code of Ethics
- **Author:** Fernando Valenzuela Rasmussen / Raven Legal
- **Reference:** SDC-CE-202405
- **Date of Approval of the Current Text:** 02 November 2023
- **Title of the Standard:** Code of Ethics
- **Date of Application:** 01 June 2024
- **Geographical Scope of Application:** Global
- **Approving Body:** Board of Directors
- **Standards Developed:**
 - Criminal Compliance System
 - Whistleblowing System
 - Code of Ethics
 - Global Anti-corruption Compliance Policy
 - Crime Prevention Models of Chile, Peru, Ecuador, Bolivia, and Colombia.
- **Published and Accessible:** Extranet and Intranet
- **Standards Replaced and Repealed:** Not applicable.
- **Current Version:** No. 2
- **Review Date:** Every 6 months or in the event of significant internal or external changes.
- **Category of Internal Standards:** Not applicable.
- **Responsible for Review and Oversight:** Sustainability and Compliance Officer.
- **Proposing Body or Department:** Sustainability & Compliance Area.

Document Change Control
Document Name: Code of Ethics

Document Code: SDC-CCP-202405

Current Version: 2.0

Date of Last Update: 14 May 2024

Version History

Version	Date	Description of Changes	Author	Reviewed	Approved	Date
1 CE 1-20231102	2 nov 2023	Creation of the initial document. Original document link: 20231102 Code of ethics - Empresas Taylor y relacionadas.pdf	Fernando Valenzuela Rasmussen	Sustainability and Compliance Officer smackenzie@iantaylor....	Directorio	30 may 2023
2.0	2 may 2024	The document was updated in accordance with Law 21.595 on Economic Crimes and internal changes to the company's organisational structure. The main adjustments include: <ol style="list-style-type: none"> 1. Simplification of Sections: Reducing redundancies and reorganising compliance content. 2. Update of Terms: Revising terms and definitions to reflect legal changes. 3. Adjustment of Procedures: Modifying protocols to align with new legal provisions. These changes ensure that the document is up-to-date and in compliance with current legislation and the company's context.	Fernando Valenzuela Rasmussen fvalenzuela@rav...	Sustainability and Compliance Officer smackenzie@iantaylor...., junto con Autor y SCA,	Sustainability & Compliance Officer	6 jun 2024
	6 jun 2024 12:00					

Proactive Implementation Note according to Law No. 20.393 and amendments by Law No. 21.595: Empresas Taylor, in compliance with Law No. 20.393, as amended by Law No. 21.595, has initiated the proactive implementation of these amendments to ensure alignment with the new legal provisions.

Table of Contents

Code of Ethics.....	.1
Document Change Control.....	2
Version History.....	2
1. Introduction.....	4
2. Commitment and Standards for Responsible Conduct.....	4
2.1. Universal Business Ethics.....	4
3. Ethical Principles and Commitments.....	5
3.1. Fundamental Company Principles.....	5
3.2. Ethical Principles of Empresas Taylor.....	5
3.3. Ethical Commitments and Social Responsibility of Empresas Taylor.....	5
3.3.0. Compliance with the Law.....	5
3.3.0.1. Relationship with Public Administrations or Authorities.....	6
3.3.0.2. Anti-Corruption Laws.....	6
3.3.0.3. Human Trafficking (Modern Slavery / Forced Labour).....	7
3.3.0.4. Anti-Money Laundering and Counter-Terrorist Financing Laws.....	7
3.3.0.5. Fair Competition.....	7
3.3.0.6. Criminal Liability of Legal Entities and Crime Prevention.....	8
3.3.1. The Company's People as the Essential Core.....	8
3.3.1.1. Respect and Dignity.....	8
3.3.1.2. Human and Labour Rights.....	9
3.3.2. Protecting Relationships.....	9
3.3.3. Care and Protection of the Environment.....	9
3.3.4. Protection of the Company.....	10
3.3.4.1. Protection of Company Assets and Property.....	10
3.3.4.2. Information Security and Confidentiality.....	10
3.3.4.3. Guidelines for Protecting Intellectual and Industrial Property in the Company.....	11
3.3.4.4. Importance of Corporate Image and Reputation.....	11
3.3.4.5. Protecting Corporate Image and Reputation in Digital Environments.....	11
3.3.4.6. Responsible Freedom of Expression and Safeguarding Corporate Reputation.....	11
4. Corporate Ethics Leadership.....	11
4.1. Fundamental Roles: Governance and Ethical Leadership.....	11
4.2. Ethical Leadership: Key Responsibilities.....	12
4.3. Personal Responsibility: Acting with Integrity.....	12
4.4. Ethical Compliance Function: Responsibilities.....	12
4.4.0. Ethics and Compliance Committee.....	13
4.4.1. Responsible for the Compliance Function (RFC).....	13
5. Ethical Whistleblowing Channel.....	14
7. Group Code of Ethics and Compliance: Guidelines for Harmonisation of Related Entities.....	14
8. Availability and Commitment to the Code of Ethics.....	15
9. Disciplinary Measures and Legal Actions for Non-Compliance with the Code of Ethics.....	15
10. Awareness and Training in Corporate Ethics.....	15
11. Evaluation, Control, and Supervision of the Code of Ethics.....	15
11.1. Responsibilities of the SCO or LCO and Evaluation of the Code of Ethics.....	15
11.2. Periodic Review of Compliance with the Code of Ethics by the Ethics and Compliance Committee.....	15
12. Approval and Update Process of the Code of Ethics: Sustained Commitment to Responsible and Ethical Business Conduct.....	16

Code of Ethics

Código de Ética

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

1. Introduction

This Code of Ethics, a cornerstone of the Criminal Compliance Management System (SDC, by its initials in Spanish), promotes ethical values and principles in all operations and relationships of Empresas Taylor, both internal and external. All members and related entities are expected to be familiar with this Code, whose latest version is accessible on the websites of Empresas Taylor and its associated entities.

2. Commitment and Standards for Responsible Conduct

This Code of Ethics:

1. Demonstrates the Company's **commitment** to business ethics, promoting values and principles for ethical and responsible conduct.
2. Seeks to **positively influence** both internal behaviour and that of related third parties.
3. Acts as a **guide** for ethical behaviour, serving as guiding principles for decision-making rather than a rigid set of rules.
4. Is **universal**, applicable to all business relationships, maintaining a common standard despite local legal differences.
5. Establishes a **minimum commitment to society**, inspired by the Company's values and in line with Corporate Governance recommendations.
6. Requires **effective communication and dissemination** at all levels of the Company and linguistic adaptation as necessary.
7. Includes **continuous training and measures** to increase ethical awareness.
8. Designates a **body responsible for its interpretation**, application, and oversight, integrated into the SDC.
9. Integrates a **channel for reporting ethical breaches**, aligned with the Whistleblowing System.
10. Defines a **disciplinary regime** for breaches of the Code.
11. Stipulates clear **obligations** for members of the organisation and related third parties.
12. Is a key **component of the Company's SDC**.

2.1. Universal Business Ethics

The Code of Ethics is mandatory for everyone in the Company, covering Empresas Taylor S.A. and all Group entities (Empresas Taylor), regardless of location or activity. Its purpose is to unify the compliance of ethical principles, requiring formal adherence from each Group company or through an aligned or adapted existing Code.

- All members, without exception, must adhere to these ethical values and principles in all their actions and relationships, both internal and external. Adherence to this Code may also be required of third parties linked to the Company, such as suppliers and customers, to promote transparency and responsibility in all interactions.
- The extension of these principles to stakeholders is aligned with international standards and social responsibility practices, supporting the promotion of an ethical supply chain.
- Compliance with the Code must not contravene applicable legal provisions and must be adjusted in case of discrepancies. More stringent internal regulations or practices will prevail over the Code.

All involved will receive electronic notification of the Code, assuming the obligation of compliance in writing, ensuring their knowledge and effective application.

Specific exceptions to the Code can only be authorised by the Sustainability and Compliance Officer (SCO) or Local Compliance Officer (LCO), who will inform the Board of Directors (BOD).

3. Ethical Principles and Commitments

3.1. Fundamental Company Principles

The essential corporate principles guiding the Company and its members towards achieving strategic objectives include:

- **Transcendent Sense of Work:** Recognising that our actions and efforts transcend time, allowing us to leave a lasting legacy.
- **Social Sense of Work:** Understanding that our work goes beyond individual benefit, contributing to the common good and benefiting society as a whole.
- **Commitment to Excellence:** Striving for the highest quality in every task, reflecting our passion and daily dedication.
- **The Company as a Family of Families:** Valuing our organisation not only as a group of individuals but as a community composed of diverse families, providing stability and recognising the crucial role of family in human development.
- **Daily Conduct Based on Values:** Our actions are grounded in values such as honesty, proactivity, responsibility, innovation, collaboration, respect, and rigour, guiding our daily conduct.

3.2. Ethical Principles of Empresas Taylor

Empresas Taylor firmly adheres to integrity, guiding its decisions by the distinction between right and wrong and maintaining its commitments with honesty. It values human life and dignity, respecting applicable laws and regulations. In the Company:

- In its **pursuit of excellence**, it commits to continuous improvement, innovating and anticipating the needs of its stakeholders to achieve quality, responsible, and safe outcomes.
- **Respect is essential** in all interactions, considering diverse sensitivities and protecting both its own image and reputation as well as that of its collaborators.
- Individuals are responsible for their own actions and are aware of the consequences of those actions, as well as those carried out on its behalf or in interaction with it, whether by its members or associates. Actions are taken within the scope of freedom, acknowledging the impact of decisions.
- **Passion** motivates daily work, fostering professional and personal growth and generating value.
- **Safety** is a priority, adopting best practices and proactive attitudes to protect life, the environment, and the communities where it operates.
- **Honesty** and ethics prevail in all relationships, with a commitment to sustainability and community well-being.
- Guided by **justice**, rejects deceit and inappropriate means to achieve its objectives, promoting reasoned and fair decisions.
- It fosters collaboration and teamwork, based on mutual trust and the interest in establishing long-lasting and beneficial relationships for all parties involved.

3.3. Ethical Commitments and Social Responsibility of Empresas Taylor

The principles, values, and virtues of Empresas Taylor foster a constant commitment to ethics, integrating these guidelines into its internal regulations and corporate practices. The key commitments arising from this approach include:

1. **Compliance with the Law:** Absolute commitment to adhering to all laws and regulations in its activities.
2. **People as the Essential Core:** Recognising the fundamental value of its collaborators, promoting a safe and conducive environment for personal and professional development.
3. **Protection of Relationships:** Maintaining relationships based on trust, transparency, and collaboration with clients, suppliers, and other strategic partners.
4. **Environmental Care:** Commitment to sustainability and minimising the environmental impact of its operations, ensuring resource conservation and environmental care.
5. **Protection of the Company:** Safeguarding the organisation's reputation, assets, and interests by implementing measures against fraud and abuse.

3.3.0. Compliance with the Law

Empresas Taylor is dedicated to being **a model of good corporate citizenship**, grounding its business culture in compliance and respect for its principles, values, virtues, and all applicable laws where it operates, including its internal regulations according to its SDC. This commitment involves:

1. **Compliance with Legislation and Regulations:** Strictly adhering to all applicable laws, regulations, and standards in every country and jurisdiction where we operate, including the temporary activities of our members. This entails respecting both the letter and the spirit of these regulations, ensuring that our practices are not only legal but also ethical and aligned with the principles these laws aim to promote.

2. **Strict Adherence to Internal Standards and Codes of Ethics:** Abiding by the Organisation's internal standards and any applicable codes of ethics or conduct. In cases where more stringent standards exist, these are given precedence over less rigorous ones. A similar commitment to corporate ethics is expected from all related parties, requiring alignment with Empresas Taylor's values.

3. **Integrity in Conduct:** All members of the Organisation must act with integrity, ethics, and professionalism, adhering to laws and regulations, always seeking the common good. Any violation of these standards is prohibited, with no exceptions for reasons of efficiency or quality of service.

4. **Promotion of an Ethical and Compliance Culture:** The entity takes responsibility for fostering this culture at all organisational levels, making this commitment a cornerstone of its corporate responsibility.

Empresas Taylor reflects its ethical and legal compliance commitment in various critical aspects of its operations:

3.3.0.1. Relationship with Public Administrations or Authorities.

3.3.0.2. Anti-Corruption Laws.

3.3.0.3. Human Trafficking (modern slavery / forced labour).

3.3.0.4. Anti-Money Laundering and Counter-Terrorist Financing Laws.

3.3.0.5. Fair Competition.

3.3.0.6. Criminal Liability of Legal Entities and Crime Prevention.

Each of these aspects is developed further below:

3.3.0.1. Relationship with Public Administrations or Authorities

In the territories where it operates, Empresas Taylor maintains close relationships with Public Administrations or Authorities, which are crucial for its operations. The Company values **direct, open, and transparent communication** with these entities, respecting their administrative, judicial, or legislative functions, and emphasises that all interactions must adhere to legal and ethical standards. Those affected by this document are expected to:

1. **Promotion of Interests:** In interactions with public institutions, the interests of Empresas Taylor must be promoted respecting the relevant authorizations.
2. **Accuracy and Compliance in Communications:** Communications with Public Administrations, whether directly or through intermediaries, must be accurate and comply with all applicable laws and regulations.
3. **Prohibition of Illicit Benefits:** It is strictly prohibited to offer cash payments or any other type of benefit to unduly influence official procedures.
4. **Transparent Collaboration:** Empresas Taylor collaborates transparently with authorities, providing complete, accurate, and timely information, always through legal channels and in accordance with the law.

3.3.0.2. Anti-Corruption Laws

The Company commits to adhering to all applicable laws and rejects any form of corruption, bribery, or unethical practices, implementing principles and controls to ensure ethical conduct. This includes:

- **Integrity in Business:** Not accepting or offering, directly or indirectly, advantages, gifts, or benefits of questionable origin and of any nature to obtain economic gains or undue business advantages.
- **Conflict of Interest:** Maintaining impartiality, objectivity, and loyalty, avoiding any conflict between personal and professional interests, and prohibiting involvement in matters that compromise the Company or unauthorised access to confidential information¹.
- **Business Opportunities:** Prohibiting the use of Company opportunities for personal or third-party benefit, establishing policies to ensure integrity in contracts and prevent fraud.
- **Due Diligence:** To ensure proper recording and control in all business activities, it is essential that these are conducted in accordance with the law, in an expected and required manner, and with common sense in the specific circumstances of each case. This involves conducting a thorough analysis before

¹ Objective No. 1 of the Gifts and Hospitality Policy. [Política de Regalos y Hospitalidades](#)

This document is for the exclusive use of the Company. External reproduction and use are permitted only with explicit authorisation. Empresas Taylor S.A. is not responsible for the content or implications of the use of this document by third parties.

starting projects, transactions, or any business activity, extending this diligence to all members of the organisation, associates, and third parties. This analysis should consider aspects such as gifts, hospitality, sponsorships, donations, and any interactions with the public sector.

- **Financial and Non-Financial Controls:** Implementing necessary controls to prevent and detect improper conduct, ensuring transparency and compliance in all operations.

3.3.0.3. Human Trafficking (Modern Slavery / Forced Labour)

The Company adopts a zero-tolerance stance against slavery, forced labour, and human trafficking in all its spheres of influence, committing to:

1. **Prohibition of Slavery and Forced Labour:** No activity of the Company will permit forms of slavery, forced labour, or human trafficking.
2. **Rejection of Child Labour:** Strict prohibition of the employment of child or forced labour in all operations.
3. **Compliance with Local Legislation:** Observing relevant laws that combat human trafficking and protect equivalent rights.
4. **Extension of Standards to Third Parties:** Requiring all Associates, Stakeholders, and Third Parties to comply with and promote these ethical standards.

3.3.0.4. Anti-Money Laundering and Counter-Terrorist Financing Laws

Empresas Taylor firmly adheres to laws against money laundering and terrorist financing, committing to:

1. **Compliance with Laws:** Observing all local legislation prohibiting money laundering and terrorist financing.
2. **Prohibition of Illicit Practices:** Rejecting any relationship with entities or individuals involved in money laundering or terrorist activities, whether direct or indirect.
3. **Due Diligence:** Executing a verification process before establishing business relationships to ensure the legality and legitimacy of counterparts, as well as during and after.
4. **Reputable Associations:** Maintaining relationships only with entities and individuals of legitimate origin and good reputation, establishing mechanisms to detect and manage suspicious transactions.
5. **Reporting Suspicious Transactions:** Informing relevant authorities of any activity potentially related to money laundering or terrorist financing when appropriate.
6. **Reporting Violations:** Requires Members of the Organization and Associated Persons to report breaches of these standards, either through the whistleblowing channel or directly to compliance officers.
7. **Internal Policies and Controls:** Establishing and maintaining internal policies and procedures to prevent illicit activities.

3.3.0.5. Fair Competition

Empresas Taylor firmly adheres to laws combating money laundering and the financing of terrorism, committing to:

1. **Prohibition of Strategic Information Exchange:** Avoid sharing strategic information such as prices, commercial conditions, bids, discounts, profits, costs, market shares, customer lists, and market trends with competitors or customers.
2. **Maintaining Price Competition:** Abstaining from discussing prices or commercial conditions with competitors to preserve fair competition.
3. **Rejection of Anti-Competitive Agreements:** Not participating in agreements that restrict free competition, such as market allocation, price fixing, or customer and territory allocation.
4. **Fair Selection of Suppliers:** Ensuring the selection of suppliers and business partners is based on technical, economic, and legal criteria without unjustified exclusions.
5. **Confidentiality of Information:** Protecting sensitive Company information, avoiding its disclosure that could benefit competitors.
6. **Non-Tolerance of Unfair or Deceptive Practices:** Adopting a firm stance against any conduct that distorts competition or harms other market actors.
7. **Avoiding Abuse of Dominant Position:** Not engaging in predatory practices that may harm competition or consumer interests.
8. **Prevention of Conflict of Interest:** Promoting a clear separation of roles to avoid conflicts of interest, especially in executive positions of competing companies.

3.3.0.6. Criminal Liability of Legal Entities and Crime Prevention.

Given the legal context of the Organisation, the Crime Prevention Model or Criminal Risk Model (hereinafter, MPD) and the SDC aim to reinforce compliance with the requirements of current legislation on the criminal liability of legal entities. In Chile, this aligns with Law 20.393 and Law 21.595, and in other countries where the Company operates, it aligns with equivalent laws recognising such liability. This commitment includes:

1. **Objective of the SDC and MPD:** Aiming to prevent specific crimes that generate criminal liability for each entity, its purpose is to achieve exemption in case a certain crime occurs.
2. **Autonomous Compliance Body:** Assigning a Responsible for the MPD with independent initiative and control powers, as established in the Compliance Function Regulations, equipped with necessary resources and direct reporting access, appointed directly by the BOD, to supervise its operation and compliance.
3. **Management of Criminal Risks:** Managing all behaviours susceptible to constitute a crime. This determines possible behaviours that could lead to crimes linked to the company's activities, operations, or processes, aiming to prevent, detect, and react. Applied as follows:
 - a. **Corporate Group:** Includes all Group entities and those under its direct influence, particularly when there are ownership or participation relationships.
 - b. **Universality:** Affects all Group members in any function, position, or role.
 - c. **Applicable Entities:** Extends to both Empresas Taylor S.A. and all its related entities without exception.
 - d. **Personal Scope:** It is the responsibility and obligation of all individuals within and from the Organization and third parties acting on its behalf, with or without representation.
 - e. **Activities and Processes:** Encompasses all Company operations, processes, and activities.
 - f. **Exclusion:** It does not consider crimes committed exclusively against the legal entity itself.
4. **Implementation of Protocols and Procedures:** Establishing strategic, organisational, and operational guidelines.
5. **Administration and Audit of Resources:** Administering and auditing financial and non-financial resources to prevent their use for illicit purposes.
6. **Reporting Procedures:** Implementing procedures for reporting possible infractions through the Whistleblowing System.
7. **Dissemination and Training:** Conducting periodic dissemination and training.
8. **Adequate Resources:** Allocating sufficient resources to ensure effective supervision and control.
9. **Obligation to Inform:** Establishing the obligation to inform about potential risks and non-compliance to the body responsible for supervising its operation and compliance.
10. **Internal Disciplinary System:** Implementing an internal disciplinary system that adequately and proportionally sanctions non-compliance with established measures.
11. **Continuous Evaluation, Review, and Monitoring:** Continuously evaluating, monitoring, and improving.

3.3.1. The Company's People as the Essential Core.

People are at the **heart of the Company**, and their dignity is deeply valued. We respect the values of the Universal Declaration of Human Rights and adhere to international human and labour rights standards, provided they align with the law and our principles and values, in that order. We are committed to a culture of mutual respect, rejecting any form of harassment and discrimination. Our actions are guided by the UN Guiding Principles on Business and Human Rights. All disrespectful behaviour is prohibited, maintaining an environment based on respect and ethics.

3.3.1.1. Respect and Dignity

The Company recognises human dignity as an essential and inalienable quality, committing to maintaining a respectful work environment, repudiating any abuse, discrimination, or harassment. We value and respect all cultures and conduct ourselves with integrity in our public interactions, supporting personal independence in political and social spheres. We strive to foster relationships of mutual respect and require our leaders to promote these values, combating any disrespectful or abusive behaviour.

3.3.1.2. Human and Labour Rights

The Company adheres to global principles of human and labour rights, including the Universal Declaration of Human Rights, OECD principles, the United Nations Global Compact, and ILO standards, provided they align with the law and our principles and values, in that order, committing to:

1. **Eliminate child and forced labour**, respect freedom of association, and prohibit discrimination.

2. **Promote equal opportunities** in employment and professional development, basing decisions on objective merits.
3. **Ensure a workplace free** from harassment, intimidation, or offensive behaviour.
4. Provide a safe and **respectful work environment**, resolving differences professionally, objectively, and impartially.
5. **Prohibit weapons of any kind** at work unless legally authorised and, due to the nature of the work, permitted.
6. **Support victims** of domestic violence within the Organisation.
7. Hold employees accountable for their work, ensuring fair compensation.
8. **Promote workplace safety and health**, complying with local legislation and providing safe tools.
9. **Respect employees' personal privacy**, without affecting the Company's reputation.
10. **Enforce health and safety standards**, promoting responsible use of equipment.
11. Manage personal data of employees with strict **security and confidentiality measures** in accordance with the law.

3.3.2. Protecting Relationships

Empresas Taylor is dedicated to establishing ethical and legal relationships, promoting trust, compliance, and quality in its services. Key commitments include:

1. Building trust through integrity, transparency, and quality.
2. Fulfilling commitments and resolving conflicts of interest before assuming them.
3. Knowing with whom we engage.
4. Associating with individuals and entities that reflect our ethical standards.
5. Acting truthfully and providing accurate information.
6. Maintaining effective and accessible communication.
7. Promoting sustainability and long-term relationships.

The Code of Ethics applies to all those related to Empresas Taylor, requiring adherence to this code or an aligned one. To mitigate ethical and legal risks, appropriate due diligence is conducted on existing or future relationships, evaluating:

- a. Existence of a Code of Ethics.
- b. Compliance with legal obligations.
- c. Crime Prevention.
- d. Absence of criminal records in the company, its management, and key positions, provided it does not infringe on the principle of social reintegration, unless deemed intolerable under the Company's risk policies.

Empresas Taylor commits to ethical and legal management, ensuring integrity in all operations. **Contracts will include clauses**, at a minimum, against unethical practices, ensuring:

1. Conduct that is integral, responsible, and diligent.
2. Compliance with fair competition and labour rights standards.
3. Confidentiality of information.
4. Prevention of conflicts of interest.
5. Maintenance of safety and hygiene standards.
6. Compliance with environmental and legal regulations.
7. Prevention of crimes under corporate criminal liability law.

3.3.3. Care and Protection of the Environment

The Company commits to **sustainable and responsible management**, focusing on environmental protection and community well-being. This includes:

1. Conservation of biodiversity and aquatic life to maintain ecological balance in accordance with current regulations.
2. Reducing the ecological footprint through energy efficiency, resource optimisation, and sustainable technologies.
3. Integrating sustainable environmental practices across all operational areas.
4. Promoting recycling and circular economy practices.

Moreover, the Company seeks to generate a positive impact on communities, respecting rights and promoting sustainable development. It fosters environmental awareness and participation in sustainable initiatives among its employees and establishes strategic alliances for sustainable change.

3.3.4. Protection of the Company

3.3.4.1. Protection of Company Assets and Property

Company assets and property, both tangible and intangible, must be used professionally, diligently, and efficiently for their designated purposes within the Company, avoiding any form of damage. This principle includes:

1. **Proper Use of Assets:** Assets must be used professionally and efficiently for the objectives assigned by the Company, avoiding any damage or loss.
2. **Prohibition of Unauthorised Disposal:** It is strictly forbidden to dispose of, encumber, transfer, assign, or conceal Company assets without express authorization, especially if intended to evade contractual or other responsibilities.
3. **Prevention of Loss and Damage:** Each member is responsible for taking measures to prevent the loss, damage, misuse, or sabotage of Company assets, both physical and digital.
4. **Justified Expenses:** Expenses must be justified and necessary for the development of work, commercial activities, or other Company needs.

3.3.4.2. Information Security and Confidentiality

The Company is committed to maintaining the confidentiality and security of all information related to its activities, adhering to ethical and legal practices to protect both physical and digital data. This includes:

1. **Data Protection:** Safeguarding the information of the Company, employees, stakeholders, and third parties, ensuring privacy and confidentiality.
2. **Authorization for Disclosure:** Only disclose information with prior authorization or legal requirements, with the Chief Legal Officer's approval, informing immediately through established channels of any requests from judicial or administrative entities.
3. **Professional Secrecy:** Maintaining the confidentiality of any non-public information acquired during professional duties, applicable both during and after the employment or service relationship. Misuse of professional secrecy for personal or third-party benefit will result in dismissal, contract termination, or legal action in accordance with Company policies and the Anti-Corruption Policy and/or the law.
4. **Trade Secrets:** Intrusion, disclosure, and misuse of trade secrets, both of the Company and third parties, are prohibited. This aims to ensure the confidentiality of sensitive commercial information, aligned with the Company's Anti-Corruption Policy. Trade secrets include:
 - a. **Intrusion:** Unauthorised access to trade secrets.
 - b. **Disclosure:** Disclosure without the owner's consent.
 - c. **Misuse:** Unauthorised use of trade secrets known through confidentiality or contractual/employment relationships.
5. **Use of Information:** Limit the use of data and information to professional purposes, sharing only with authorised personnel.
6. **Respect for Privacy:** Protect the personal and family privacy of individuals and legal entities, ensuring data security.
7. **Cybersecurity:** Implement rigorous measures against cyber threats, conducting regular security audits to reinforce information system protection.
8. **Prohibition of Misuse:** Avoid using Company confidential information for personal or third-party benefit, covering all types of non-public data.
9. **Informational Integrity:** Ensure the accuracy and truthfulness of provided information, avoiding misleading others.
10. **Financial Information Handling:** Ensure that financial information accurately reflects the Company's assets and financial situation, following accounting and tax regulations.
11. **Collaboration with Audits:** Facilitate the work of internal and external auditors, maintaining the integrity and independence of audit processes.

3.3.4.3. Guidelines for Protecting Intellectual and Industrial Property in the Company

The Company prioritizes the respect and protection of its own and third-party intellectual and industrial property, establishing clear guidelines:

1. **Safeguarding Intangible Assets:** Protecting knowledge, ideas, methodologies, and other intangible assets of the Company and third parties.
2. **Compliance with Laws and Contracts:** Adhering to all relevant laws, regulations, and contractual

agreements, respecting intellectual and industrial property rights.

3. **Prohibition of Unauthorized Reproduction:** Avoiding unauthorized copying, adaptation, or publication of copyrighted materials.
4. **Appropriate Technology Use:** Ensuring the use of Company systems and equipment does not infringe on intellectual and industrial property rights, including avoiding illegal reproduction of protected materials.
5. **Intellectual Property Registration:** Properly and systematically registering all intellectual and industrial property rights belonging to the Company.
6. **Information Security:** Respecting the Company's information security policies, protecting access to and appropriate use of information systems and technologies.
7. **Licenses and Authorizations:** Avoiding the installation or use of software without the necessary legal licenses or authorizations, following Company homologations.

3.3.4.4. Importance of Corporate Image and Reputation

Corporate image and reputation are crucial for the Company, underpinning trust and reflecting corporate values in economic activities. Thus, any conduct that may damage these valuable assets is prohibited, which are constantly cultivated.

3.3.4.5. Protecting Corporate Image and Reputation in Digital Environments

Protecting corporate image and reputation in digital environments is crucial given the ease of information access on digital platforms. To safeguard these critical assets, technical security measures must be adopted, considering:

1. **Digital Risks:** Recognizing threats such as cybercrime, cyberbullying, and online defamation, and taking action to mitigate them.
2. **Security Measures:** Implementing proportional, justified, appropriate, and necessary controls to prevent the misuse of digital media.

3.3.4.6. Responsible Freedom of Expression and Safeguarding Corporate Reputation

Empresas Taylor respects the freedom of expression of its members, associates, and collaborators, emphasizing responsible exercise:

1. **Constructive Dialogues:** Encouraging the use of digital platforms for constructive dialogue. Personal opinions should be clearly distinguished from the Company's official stances.
2. **Protection of Confidential Information:** Prohibiting the sharing of internal data, practices, or operational procedures in public forums without explicit written authorization.
3. **Confidentiality:** Maintaining confidentiality regarding sensitive Company matters. Any external communication related to the Company must be previously reviewed and approved.
4. **Reputation Preservation:** Avoiding online activities that may damage the Company's reputation. Awareness of the impact of actions and statements on corporate image is essential.

4. Corporate Ethics Leadership

4.1. Fundamental Roles: Governance and Ethical Leadership

The Board of Directors (BOD), the Chief Executive Officer (CEO), and each Country Manager (CM) are pillars in promoting the company's ethical culture and ensuring the continuity of our values and ethical principles. The BOD is responsible for approving and overseeing the Code of Ethics, appointing an individual responsible for ethical compliance, and managing potential infringements. The CEO and each CM drive this ethical culture, integrating the code throughout the company, and providing the necessary resources for its execution.

The synergy between the BOD, the CEO, and the CM is fundamental for governance and committed leadership, ensuring that business ethics are implemented promptly and efficiently.

4.2. Ethical Leadership: Key Responsibilities

Company leaders have key responsibilities in promoting ethics, including:

1. Knowing, disseminating, understanding, complying with, supporting, and promoting the Code of Ethics, ensuring its adherence.
2. Integrating ethical standards into the policies and procedures they are responsible for or participate in.

3. Promoting ethical training and ensuring conduct aligned with the Code within their team or area and with third parties they interact with, directly and indirectly.
4. Encouraging the use of communication channels to report conduct contrary to the Code, ensuring a retaliation-free environment.
5. Immediately reporting any ethical non-compliance to the SCO or LCO and/or their team through established channels.
6. Refraining from conducting independent investigations related to this Code and directing all reports as specified in the previous point.
7. Collaborating in investigations, reviews, and audits.
8. Disseminating and promoting knowledge of the Code among stakeholders and associates.
9. Participating in the identification and evaluation of ethical risks.
10. Ensuring compliance with external codes of ethics aligned with the company's principles.

4.3. Personal Responsibility: Acting with Integrity

Each member of the organisation assumes personal responsibility for acting with integrity at all times and in any situation, even when these are complex or critical. The main responsibilities assigned to each individual include:

1. Familiarising themselves with and strictly complying with the provisions of this Code in all actions and decisions, as well as adhering to the laws, regulations, and internal policies of the company governing their business unit, region, and/or function.
2. Adhering to the obligations, policies, procedures, and processes of ethical compliance established by the company, fully assuming responsibility for their conduct.
3. Reporting immediately, according to the Whistleblowing System, any concerns, problems, or conduct contrary to this Code, as well as potential violations of laws, regulations, norms, or breaches of policies, standards, or internal procedures, especially those related to the SDC.
4. Appropriately managing any known Code breaches.
5. Within the scope of their competence, they must refrain from conducting investigations on their own and must refer to any news or report they receive or become aware of, directly or indirectly, in accordance with the provisions outlined in point 3 above.
6. Fully collaborating and being truthful in internal and external investigations, reviews, and audits.
7. Actively contributing to disseminating and promoting knowledge and understanding of the Code among stakeholders, associates, and third parties they interact with.
8. Participating, if requested, in the processes of identifying, analysing, and evaluating ethical risks.
9. Understanding and complying with the codes of ethics and policies of stakeholders, associates, and third parties when applicable, as long as they align with this Code and the other policies comprising the SDC.
10. Raising concerns and making inquiries about ethical issues to their direct supervisor, the human resources department, the legal area, and/or compliance function, as appropriate, according to the Whistleblowing System.

4.4. Ethical Compliance Function: Responsibilities

The Ethical Compliance Function, according to the Compliance Function Regulations of Empresas Taylor, is crucial in ensuring adherence to laws, regulations, and ethical standards. Its goal is to foster and implement a culture of integrity and ethics in daily business operations and decisions.

The company's organisational structure defines clear roles to support this function:

1. The BOD **leads by example**, strengthening the ethical culture and overseeing the implementation of the Code of Ethics, while managing and directing the company towards ethical compliance.
2. Operational Management **plays a significant role in ethical leadership**, promoting the knowledge, adherence, and effective application of the Code of Ethics within their teams and areas, and with third parties they engage with.
3. All Members of the Organization **have the responsibility to act with integrity**, adhere to ethical compliance policies, and report any concerns or violations.
4. The Compliance Function of the Empresas Taylor S.A. **is the primary authority responsible for the global application of the Code**.
 - a. Each LCO, or designated individual, is responsible for its local application as appropriate.
 - b. The Ethics and Compliance Committee supports and advises the SCO.
 - c. The Sustainability & Compliance Area (SCA) manages global and local tasks in Chile as entrusted by the SCO.

4.4.0. Ethics and Compliance Committee

The Responsible for the Compliance Function (RFC) at the global level is the SCO of Empresas Taylor S.A., in accordance with the provisions of the SDC and the Compliance Function Regulation. Each **LCO is responsible at the local level**, as applicable. The responsible officer must ensure the correct interpretation and supervision of the application of the Code of Ethics, promoting familiarity with and adherence to the Code, with access to the necessary resources for an autonomous and independent function.

1. Resolving queries regarding the Code.
2. Advising on ethical reports.
3. Proposing and directing corrective actions.
4. Supporting ethical investigations.
5. Managing resources for compliance and prevention.
6. Communicating and educating about corporate ethics.
7. Managing risks.
8. Continuously evaluating and improving ethical compliance.

Members, including the SCO, Chief Legal Officer (CLO), and Chief Financial Officer (CFO) of Empresas Taylor S.A., may be supplemented by external experts as needed. They are subject to a special disciplinary regime to ensure compliance with their ethical responsibilities as defined in the Compliance Function Regulations.

4.4.1. Responsible for the Compliance Function (RFC)

The Responsible for the Compliance Function (RFC) globally is the SCO, as stipulated in the SDC and the Compliance Function Regulations, with each LCO holding responsibility at the local level as applicable. The RFC is tasked with ensuring the correct interpretation and supervision of the application of the Code of Ethics, promoting familiarity and adherence to the Code, and having access to necessary resources for an autonomous and independent function.

Globally, the SCO may request and demand information from the LCOs to represent and manage ethical compliance in specific areas, with delegated powers from the highest authority of each entity. The LCOs fulfill the responsibilities and powers assigned to them locally by their respective highest authority.

These LCOs must regularly report on the effectiveness of the Code of Ethics and adapt to specific regulations where applicable, applying these supplementarily as stipulated in the respective MPD.

The RFC's main responsibilities include:

1. Promoting knowledge and compliance with the Code of Ethics.
2. Assisting in identifying ethical obligations.
3. Integrating ethical obligations into corporate policies.
4. Developing ethical compliance initiatives.
5. Documenting and reporting on ethical compliance.
6. Defining indicators to evaluate ethical compliance.
7. Responding to queries and managing investigations of potential Code violations.
8. Acting on alleged violations, whether ex officio or in response to reports.
9. Investigating and resolving ethical irregularities.
10. Aligning ethical policies with the SDC.
11. Presenting at least an annual report to the BOD on ethical compliance and related activities.
12. Maintaining the confidentiality of data and information, except in response to a legally issued judicial or administrative request.

5. Ethical Whistleblowing Channel

Through the Whistleblowing System, anyone can report ethical irregularities, ensuring transparency, confidentiality, and protection for whistleblowers acting in good faith. This system includes a whistleblowing channel accessible to both internal and external members of the organization, available via an online platform, phone, and email, allowing secure and anonymous reporting without fear of retaliation.

To report inappropriate conduct or violations, please communicate via the following email address. Additionally, a postal address is provided for those who prefer to send their reports by mail, ensuring multiple channels for communicating concerns related to ethical breaches or internal regulatory violations:

- **Email:** compliance@empresastaylor.com

This document is for the exclusive use of the Company. External reproduction and use are permitted only with explicit authorisation. Empresas Taylor S.A. is not responsible for the content or implications of the use of this document by third parties.

- **Postal Address:** Blanco 937, Office 601, Valparaíso, Chile.
- **Contact Phone:** +56994699147
- **Meetings:** Request for a face-to-face or telematic meeting.

This is established without prejudice to each MPD additionally implementing a local whistleblowing channel managed by the respective LCO.

6. Conflict between Codes of Ethics

To ensure ethical relationships, the Company establishes clear criteria for evaluating and managing risks associated with third parties, prioritising alignment with its principles and values. In case of conflict between codes of ethics or red flags identified during due diligence, the following measures are taken:

1. **Entities without a Code of Ethics:** If the third party is small or medium-sized and lacks an ethical code, they may be asked to adhere to the Company's code. For large companies without this alignment, the relationship will be avoided unless a favourable report from the Compliance Function is provided based on the specific case.
2. **Differences in Ethical Codes:** If there are minor discrepancies with the counterparty's ethical code, descriptive clauses could be integrated to resolve them, as long as they do not contradict the Company's fundamental values.
3. **Opposing Principles and Values:** Relationships will not be established with third parties whose ethical principles are contrary to those of the Company.
4. **Lack of Transparency:** If the counterparty refuses to provide necessary information for due diligence, or if an adequate level of transparency and trust cannot be guaranteed, the relationship will not be established.
5. **Non-Compliance with Own Codes:** If a third party does not act according to its own ethical code, an attempt will be made to correct the situation. If this is not possible, the relationship will be terminated.

7. Group Code of Ethics and Compliance: Guidelines for Harmonisation of Related Entities.

To foster cohesion and avoid conflicts between ethical codes within the Group, guidelines are established for harmonisation, focusing on adaptability to local regulations without compromising universal ethical principles:

1. **Minimisation of Conflicts:** Conflicts between codes should be limited to differences imposed by specific regulations or jurisdictions of each entity requiring mandatory compliance.
2. **Unification of Principles:** Ethical codes should consolidate a set of principles, values, and virtues that guide both the entity and its members, establishing ethics and legal compliance as fundamental pillars of the Group.
3. **Joint Interpretation and Application:** This Code should be interpreted and applied in conjunction with the internal regulations of each Group entity, respecting the corporate frameworks approved for their integration or adaptation.
4. **Adoption and Responsibility:** Each entity must adopt this Code and, through its highest authority, approve the necessary internal regulations to implement the Code's provisions, with minimal adaptations required to align with applicable norms and regulations.
5. **Guarantee of Coherence:** Ensure that necessary adaptations maintain coherence with the Code of Ethics and the Group's SDC, promoting an environment of integrity, shared responsibility, and regulatory security.

8. Availability and Commitment to the Code of Ethics

The Code of Ethics is accessible to all members of the Organization and Group entities via the intranet and corporate website, ensuring wide dissemination and understanding. Each member is required to personally receive the Code in digital format and sign a declaration of receipt, adherence, and commitment.

Additionally, the Code is made available to third parties on the corporate website, promoting transparency and ethical commitment beyond the boundaries of the Organization.

For those in roles with high exposure to ethical risks, a periodic declaration of knowledge and adherence to the Code and specific policies related to the risks identified in their areas of responsibility is required.

9. Disciplinary Measures and Legal Actions for Non-Compliance with the Code of Ethics

In the event of any non-compliance, a thorough internal investigation will be initiated. Proven non-compliance with

the Code of Ethics may result in the following disciplinary measures according to the Company's internal regulations and legal actions:

1. **Verbal Warning:** The first measure for minor infractions, seeking immediate correction.
2. **Written Warning:** For recurrences or more serious violations, a written warning will be issued.
3. **Economic Penalties:** Depending on the severity and impact of the non-compliance, economic sanctions may be imposed or benefits (bonuses) not granted.
4. **Dismissal or Enhanced Measures:** In cases of extreme severity or recurrence, dismissal of the individual or stricter measures towards the responsible entity will be considered.
5. **Termination of Contractual Relationships:** If third parties breach the Code, terminating contractual relationships will be evaluated, and necessary legal actions will be taken to protect the Organization's interests.

Non-compliance with this Code will be considered a serious offence, unless expressly indicated otherwise, as established in the internal regulations and/or the respective employment contract.

10. Awareness and Training in Corporate Ethics

The Company is committed to promoting awareness and training in corporate ethics among all its members, as well as Interested Parties, Associated Persons, and Third Parties. This initiative aims to:

1. **Manage Ethical Risks.**
2. **Commitment to the Code of Ethics:** It is expected that all those under the scope of this Code are not only fully informed about its content but have also received specific training related to it, committing to follow the principles, virtues, and ethical values that define corporate conduct.

11. Evaluation, Control, and Supervision of the Code of Ethics

11.1. Responsibilities of the SCO or LCO and Evaluation of the Code of Ethics

The SCO and the LCOs have key responsibilities in the global and local evaluation and supervision of the Code of Ethics, respectively:

1. **Periodic Evaluations:** They will carry out evaluations when the context changes. Regardless, if the context has not changed, it must be evaluated at least once during a calendar year.
2. **Reporting to the BOD:** The results of these evaluations will be reported directly to the BOD and may be disclosed internally and externally as determined, ensuring transparency and accountability.
3. **Continuous Supervision:** They will be responsible for the continuous supervision of the implementation of the Code's provisions, ensuring that they are respected and effectively implemented in all areas of the Company.

11.2. Periodic Review of Compliance with the Code of Ethics by the Ethics and Compliance Committee

The Ethics and Compliance Committee will support the SCO, at the global level, in the continuous evaluation of the Code of Ethics:

1. **Periodic Review:** Organise regular reviews to analyse both the adequacy and effectiveness of the Code of Ethics within the Company's operations.
2. **Collaboration with the SCO:** Work closely with the SCO to ensure effective oversight and make informed decisions on possible improvements or necessary adjustments to the Code.
3. **Comprehensive Evaluation:** This review covers all aspects of the Company's activities to ensure full alignment with the established ethical principles.

12. Approval and Update Process of the Code of Ethics: Sustained Commitment to Responsible and Ethical Business Conduct.

The approval and update process of the Empresas Taylor S.A. Code of Ethics reflects its commitment to corporate responsibility and ethical integrity. This process includes:

1. **Formal Approval:** The Code was formally approved by the Board of Directors of Empresas Taylor S.A. on May 30, 2023, during its Session No. 74, and its approval was recorded in a Public Deed on July 04, 2023.
2. **Commitment to Ethical Conduct:** The Code establishes the ethical principles and values that should guide the conduct of all members of the organisation and its related entities.

3. **Adhesion of Entities:** Each Group entity, through its highest authorities, is required to formally commit to the Code's guidelines.
4. **Periodic Updates:** To ensure its relevance and alignment with best practices, the Code is regularly updated based on proposals from the Ethics and Compliance Committee.
5. **Development of Specific Policies:** The SCO or LCO may develop specific policies necessary for the proper compliance with the Code, informing these actions to the Board or SCO, respectively.
6. **Confirmation of Adherence:** All members of the organisation and third parties must confirm their knowledge and commitment to the Code after receiving the pertinent training.