

CODE OF CONDUCT FOR
SUPPLIERS AND CONTRACTORS
CAP GROUP

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I. Introduction

Building strong and long-lasting relationships requires all to act consciously and responsibly. Therefore, the way we interact with our suppliers and contractors must reflect our identity as CAP Group (hereinafter, the Group or the Company) and the shared responsibility we have in shaping the future.

A company with values and a firm and solid commitment to sustainability and integrity is the essential message of this document.

These values, along with excellence, are essential elements for establishing healthy and sustainable bonds over time, building trust, and developing a culture of "doing things right."

II. Objective

The purpose of this Code of Conduct for Suppliers and Contractors is to provide a framework that guides our business relationships with suppliers and contractors, to avoid any practices that may undermine our policies. We encourage our suppliers and contractors to adopt and bring this Code to life through their daily actions, especially in their commercial relationship with the Company.

Similarly, our suppliers and contractors should have their own codes of conduct to regulate their relationships with their own suppliers or extend all the provisions provided here.

III. Scope

This Code of Conduct applies to all suppliers and contractors of CAP Group, as any natural or legal person who provides goods or services to any of its companies, as well as those who act on their behalf within the framework of the commercial relationship.

Similarly, this Code is considered an integral part of the contracts that CAP Group maintains with its suppliers, and non-compliance may result in the application of the sanctions provided for in those contracts and the applicable legislation.

IV. Our Values

The values of CAP Group form the foundation upon which we build our organizational culture. These values guide our daily actions and allow us to determine which actions or behaviors are right. In this regard, we require our suppliers and contractors to be a true reflection of these values in their day-to-day activities.

Excellence

Integrity

Collaboration

Innovation

V. Key Areas

1. Environmental Care and Community Relations

As a Company, we are committed to operating our business in harmony with the environment and local communities, adhering to environmental standards. Therefore, we continuously work to make our operations sustainable, and we encourage our suppliers to do the same and contribute to:

- Comply with applicable environmental regulations for operations, always striving to minimize the impact of their activities.
- Protect the environment where contracted services are performed, contributing to the preservation of biodiversity and ecosystems.
- Promote energy savings, resource efficiency, appropriate water use, and recycling practices.
- Ensure proper waste management according to its nature and applicable regulations.
- Report any incidents that could have environmental impact.
- Implement practices and/or collaborate with the company in monitoring environmental performance, including metrics related to climate management, such as greenhouse gas emissions.
- Adopt relevant controls and mitigation actions to prevent and/or control any pollution events.
- Respect agreements with the communities where we operate and maintain an appropriate flow of information when necessary.

2. Occupational Health and Safety

The safety and health of the people is the primary focus of our operations. We are all responsible for protecting the lives and well-being of those working in our operations.

At CAP Group, we promote a culture of prevention and self-care, looking out for one another and prioritizing safety and health. Therefore, anyone working in the Company's operations must comply with occupational health and safety regulations, signage, given instructions, and current regulatory provisions.

To achieve this, our suppliers must:

- Comply with laws and internal regulations regarding occupational health and safety.
- Provide the necessary elements and conditions to perform work safely, minimizing associated risks.
- Promptly report any incidents that could pose a risk to the safety of the individuals working in or for our operations.

3. People and Human Rights

We support the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, and the fundamental conventions of the International Labor Organization (ILO).

As Grupo CAP, we are committed to respecting internationally recognized human rights in all our operations and throughout our supply chain. We require our suppliers and contractors to replicate this commitment by:

- Respect for human dignity, freedom of association, collective bargaining, the right to privacy, and fair working conditions.
- Prohibition of any form of forced labor, modern slavery, and human trafficking.
- Prohibition of child labor.
- Condemnation of behavior constituting harassment, whether sexual or workplace-related, discriminatory conduct, and unequal treatment.
- Strict adherence to labor regulations, particularly regarding hiring and termination, remuneration, working hours, unionization, and social security.
- Provide accurate information and safeguard confidential information: A key aspect of the commercial relationship involves sharing business information, which may or may not be confidential. In these processes, the transparent, truthful, and accurate provision of information is a fundamental criterion and a requirement of our relationships.

4. Integrity and Compliance

It is CAP Group's policy to conduct our business in an ethical and transparent manner. We have a zero-tolerance approach to corruption and are committed to acting professionally, impartially, and with integrity in all our activities.

To realize this commitment, there are certain topics and practices that we promote within the framework of developing and strengthening good practices in integrity and anti-corruption, which our suppliers and contractors must also adhere to in their context. These are:

- **Do not tolerate any form of corruption:** Our suppliers and contractors must commit to integrity in all activities within their value chain and their interactions with third parties, including authorities, suppliers, customers, or communities.
- Comply with current laws and regulations, particularly refrain from committing any of the offenses outlined in Law N°. 20,393.
- Promote integrity internally as a daily value.

- Define and implement measures to establish an ethical framework of expected behavior for their employees.
- **Avoid any conflict of interest:** Our suppliers and contractors must act professionally and always prioritize the best interests within the commercial relationship with CAP Group, ensuring the fulfillment of commitments and responsibilities associated with the contractual relationship, and avoiding any situation that may imply a conflict of interest.
- To not give or receive gifts that could affect or give the impression of affecting the impartiality and objectively with which we select and evaluate our business relationships.
- **Promote fair competition:** Fair competition ensures the right of every person or company to compete on equal terms. Therefore, our relationships with suppliers must be developed within the framework of respect for competition laws, avoiding any behavior that could be deemed anti-competitive.
- Provide accurate information and safeguard confidential information: A key aspect of the commercial relationship involves sharing business information, which may or may not be confidential. In these processes, the transparent, truthful, and accurate provision of information is a fundamental criterion and a requirement of our relationships.

VI. Integrity Channel

If you are aware of any situation that may be violating the provisions of this Code, other CAP Group regulations, and/or the law, you can report it anonymously, securely, and confidentially through our Integrity Channel.



<https://grupocap.ines.cl/grupocap/formulario/>