



## DONATIONS, SPONSORSHIPS AND MEMBERSHIPS POLICY

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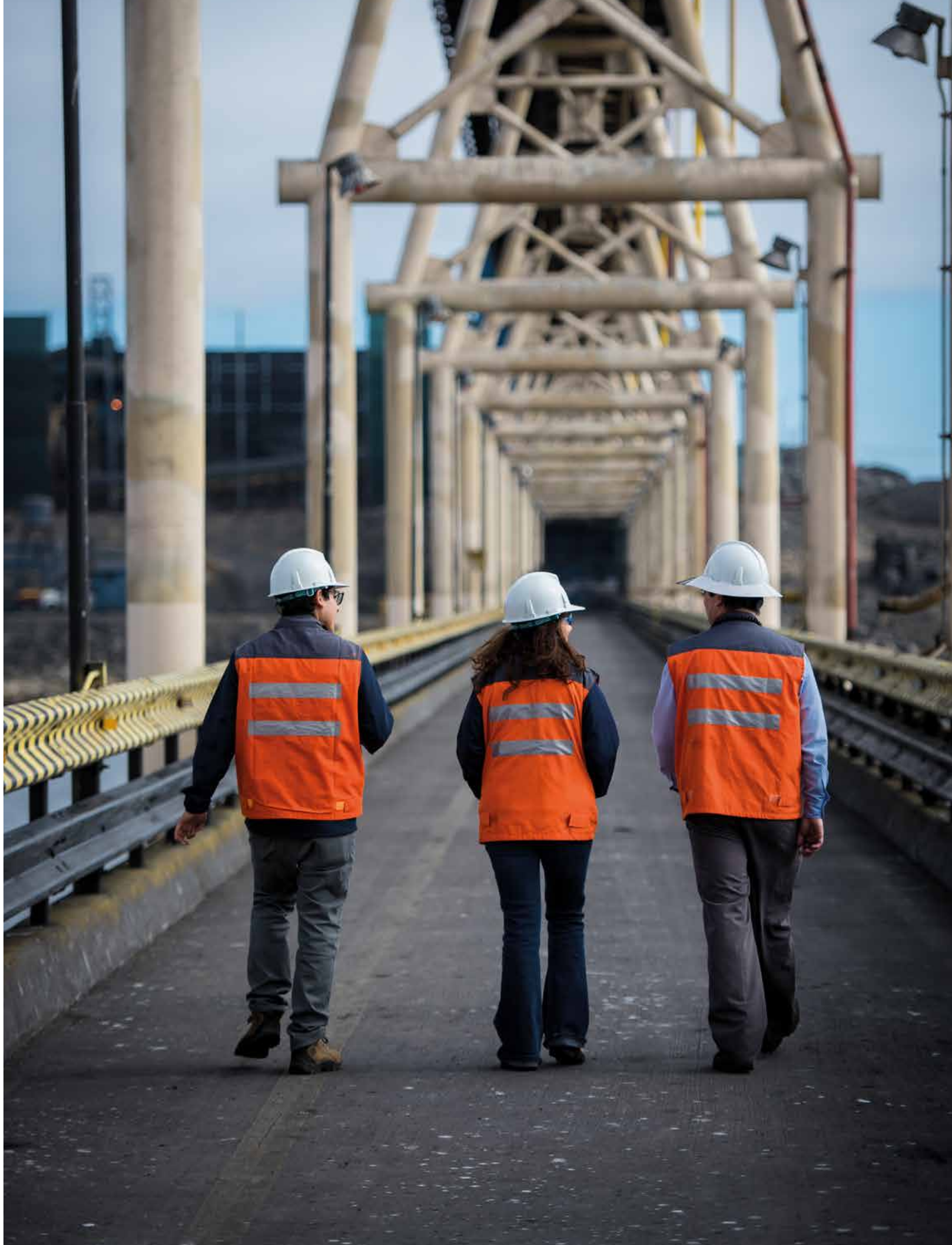
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## I. PURPOSE

Among the values of CAP Group, we find the commitment with the society in which it is involved, the interest in promoting the social, environmental and cultural development of the communities with which it interacts with, and sustainable development. All of the foregoing, in line with the provisions of the law and internal regulations developed by the Group.

This Policy establishes the general guidelines, from the perspective of compliance with the law and internal regulations, to specify the commitment of the companies of CAP Group with its environment, through donations, sponsorships and/or memberships, defining its scope and objectives.



## II. SCOPE

This Policy applies to all companies that comprise CAP Group (CAP S.A., Compañía Minera del Pacífico S.A., Imopac S.A., Compañía Siderúrgica Huachipato S.A., CINTAC S.A., CINTAC S.A.I.C., Promet Servicios SpA, Cleanairtech Sudamérica S.A., and Puerto Las Losas S.A.) and should be complied with by all persons who are part of the aforementioned companies at all levels, i.e., directors, managers, executives and employees.

This Policy shall apply to the application, processing, approval, execution and follow-up of donations, sponsorships and/or memberships.



### III. DEFINITIONS

**Contribution:** Any donation, sponsorship and/or membership, which is made or sought by any company of CAP Group.

**Sponsorship:** Material support, usually financial, given to a legal entity with the aim of obtaining a corporate benefit for the CAP Group company providing it, which is generally materialized in the presence of the corporate image of the Group or the company providing it, e.g., in large-scale events, congresses, conferences, or books, and/or any contribution whose benefit is brand positioning.

**Donations, Sponsorships and Memberships Committee:** Hereinafter “Committee”, internal entity in charge of hearing, qualifying and approving, as the case may be, the donation, sponsorship and/or membership requests, which shall be integrated by the Chairman of the Board<sup>1</sup>, the CEO and the Legal Manager or similar of the corresponding operating company<sup>2</sup>. The Committee shall not have a fixed schedule, but shall be especially established to this effect.

**Social Engagement:** Selfless social or economic contribution, whose objective is not framed in social investment, nor in the search for brand positioning, but in attending to social and economic needs in an exceptional manner, and which requires the participation of any of the companies of CAP Group.

**Donation:** Material support (financial, human or technical) given without direct consideration by the beneficiary to a natural or legal person, for the exercise of activities that serve the general interest, usually associated with cultural, social, recreational, academic or humanitarian purposes and that comply with the axes and guidelines set forth in this Policy, such as, e.g., educational, sports and foundation support programs, *inter alia*.

<sup>1</sup> The participation of the Chairman of the Board as a member of the Committee shall not be mandatory, being subject to the description and availability in each of the companies of CAP Group.

<sup>2</sup> In the case of Compañía Minera del Pacífico S.A. the Sustainability Manager shall be the one; Compañía Siderúrgica de Huachipato S.A. the Sustainability and People Manager; CINTAC S.A. and S.A.I.C the Sustainability and People Manager.



**Project Manager:** It is responsible for managing and carrying out the process of executing the donation, sponsorship or membership. Among its functions is the processing of projects, maintaining evidence of these and forwarding it to the Compliance Officer, ensuring the strict application of the provisions of this Policy at all times during the analysis, delivery and execution of the donation, sponsorship or membership.

**Social Investment:** Contribution delivered by any company of CAP Group for the development of relevant stakeholders (neighborhood associations, community development clubs, communities) in areas of direct or indirect influence of the activity of any of the companies of the Group, such as, e.g., commitments acquired within the framework of environmental impact assessment processes.

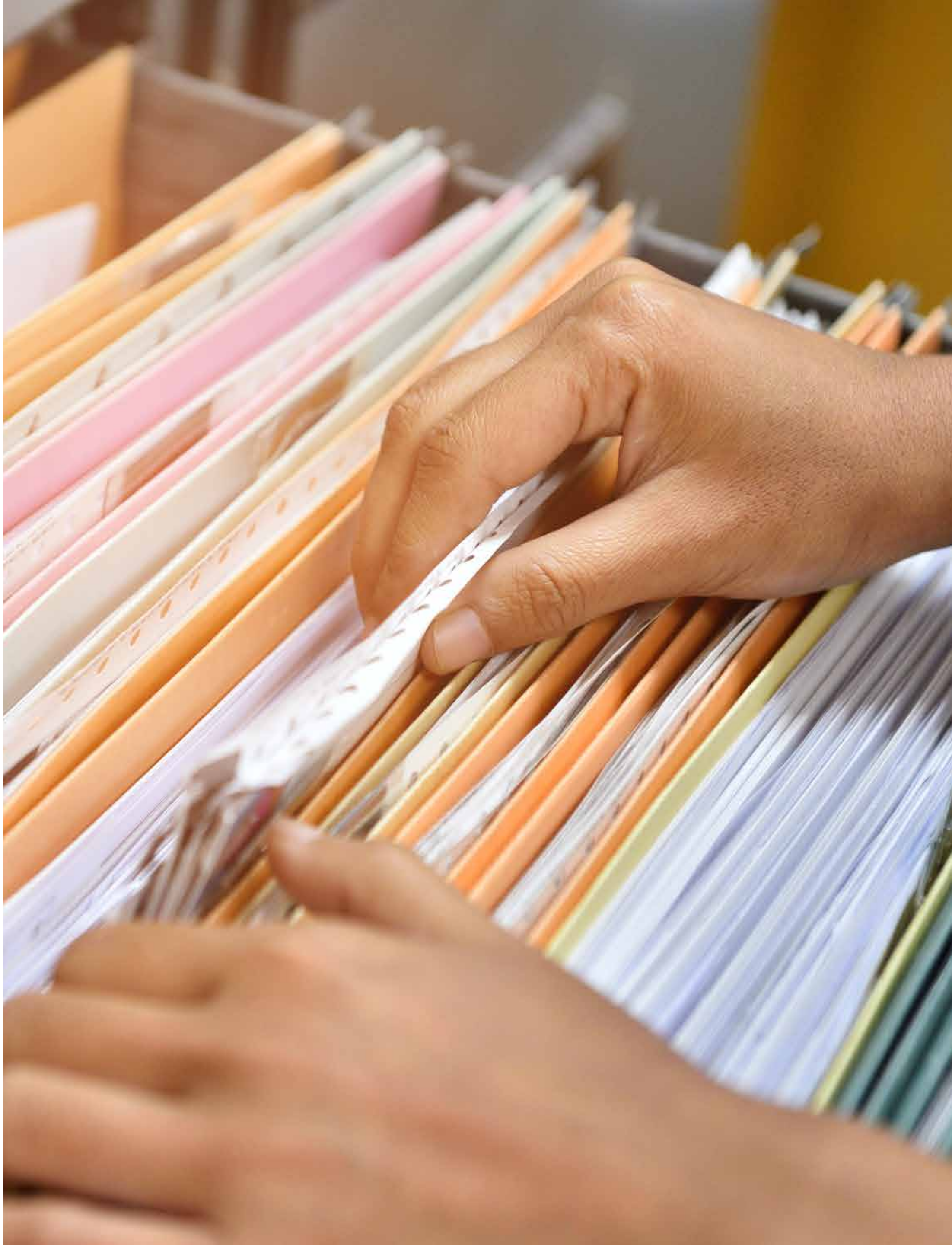
**Membership:** Material support which consists of the payment of a fee, to become a member of a given organization.

**Project:** Any proposal for donation, sponsorship or membership, referred to the assessment of the corresponding instance in each company of the Group, according to the value of the good or service to be delivered and the particular characteristics of the case, and which contains its aims and objectives, in addition to the work plan to achieve said purposes.



#### IV. REFERENCE MATERIAL

- Code of Integrity
- Crime Prevention Manual
- User guide: community projects
- Social Investment Management Policy



## V. OPERATIONAL PRINCIPLES

Through this Policy, CAP Group seeks to promote those activities that generate reciprocal value for its environment, ensuring the availability, opportunity and transparency of the benefits granted, as well as compliance with internal and external regulations.



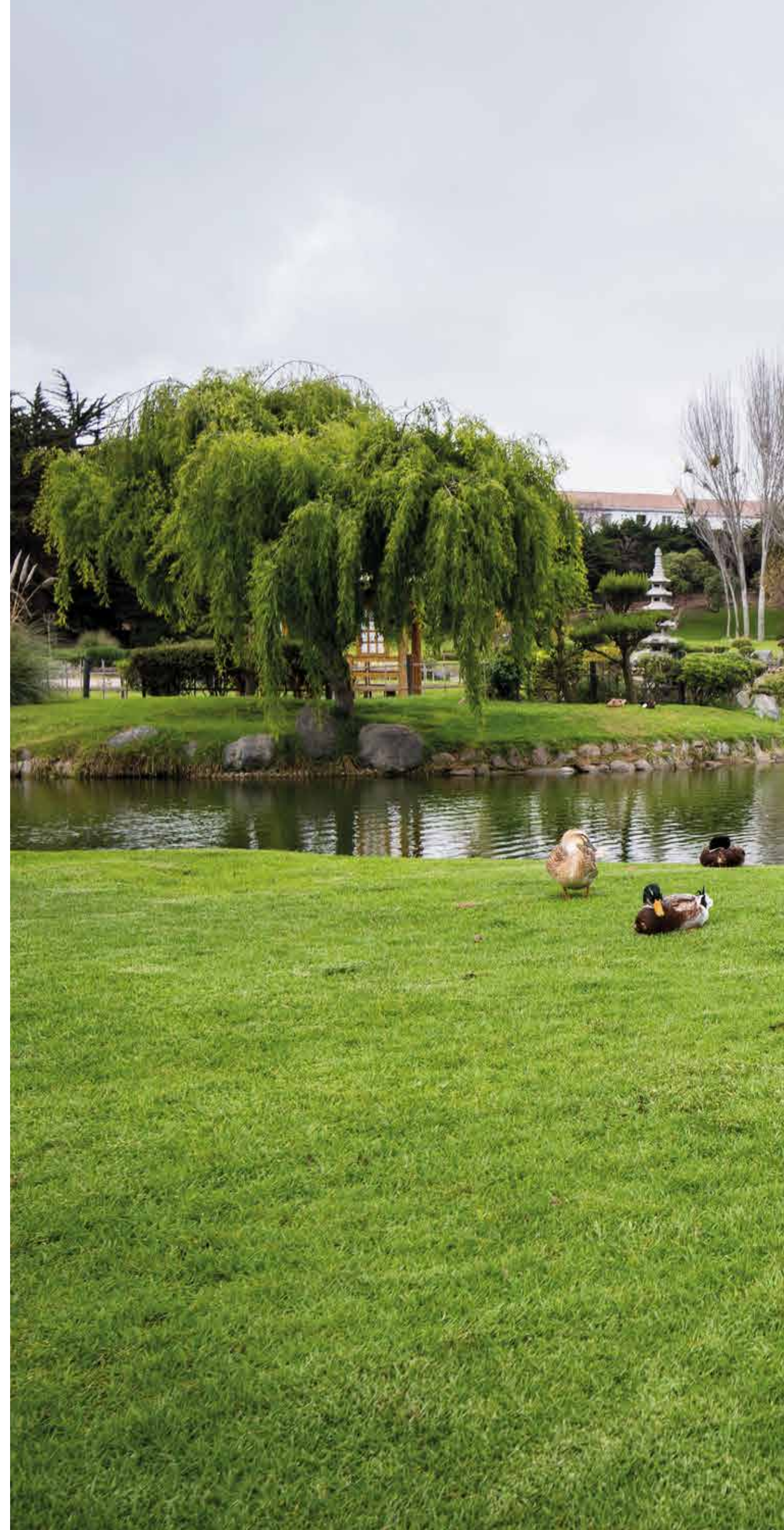
### i) *Pillars of the Policy*

CAP Group has defined that the contributions delivered shall always be framed in the following pillars:

- **Care for the environment.** CAP Group considers contributing to the opportunities and needs arising from the coexistence of the operation with the environment in general and the areas of direct or indirect influence as part of its social investment strategy.
- **Social and/or cultural interest.** CAP Group considers its contribution to society to be essential, through the development of projects in the field of education, culture and the promotion of sports activities.
- **Business development.** CAP Group shall contribute to projects associated with the strengthening of its business model, the adoption of the best practices for its development, and the promotion of productive activities associated with those carried out by the companies within the Group.
- **Sustainable development of the environment and communities it interacts with.** It is one of the foundations of the social investment strategy of CAP Group, and includes contributions for the maximization of opportunities generated by our operations, within a framework of sustainability, independence and self-sufficiency, fostering the development of knowledge and skills for the management of community development projects.

All these aspects shall be implemented and executed under a suitable control environment, respecting the internal and external regulations, and always keeping the documentation and rationale of the actions carried out.

Any contribution, whether it be a donation, sponsorship and/or membership shall be linked to the pillars outlined in this Policy and shall be supported by a project previously submitted by the applicant. An explanation of the cause shall be provided in the project behind it.

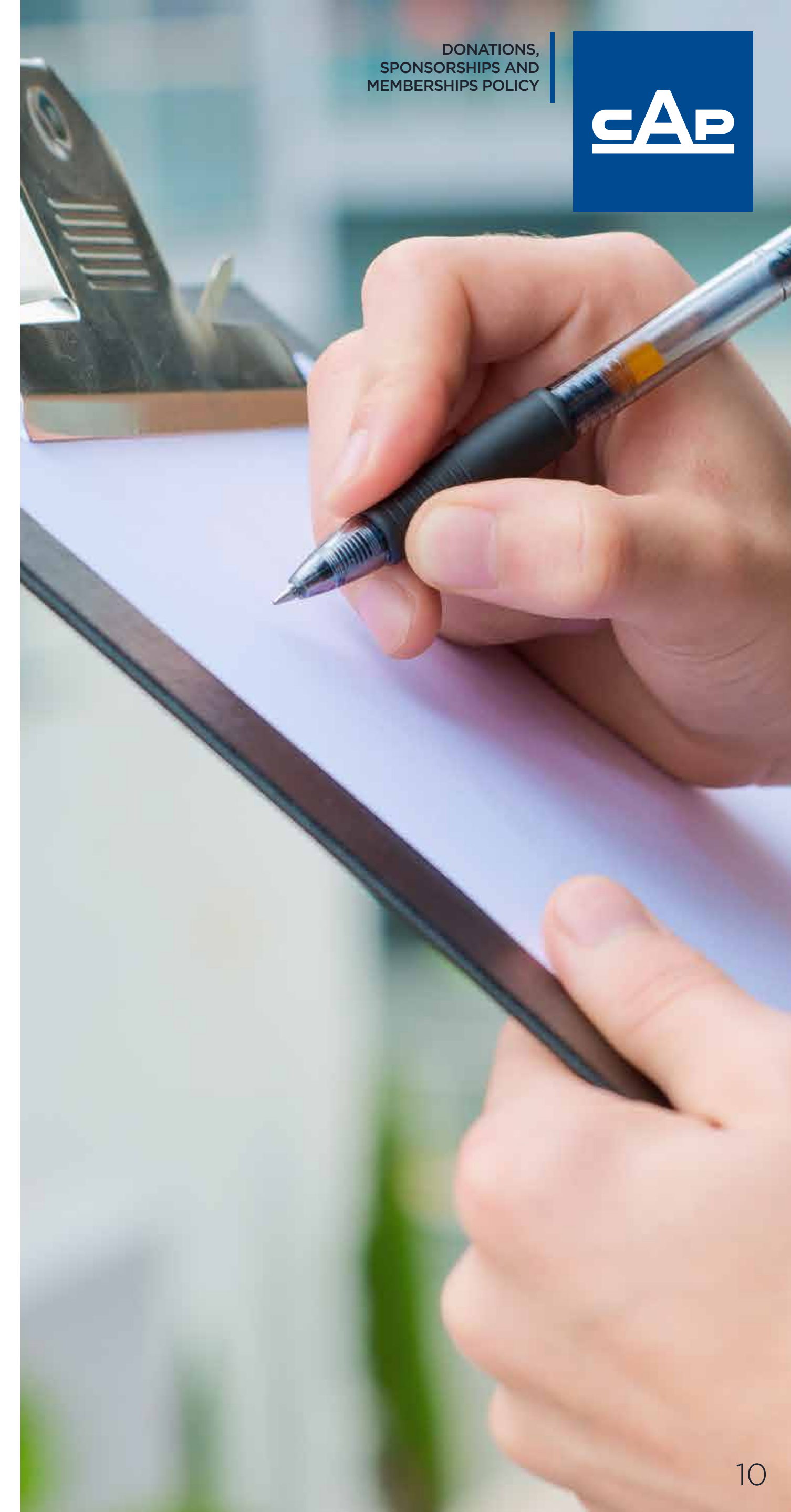


## ii) *Potential beneficiaries*

The beneficiaries of the contributions approved and granted by companies of CAP Group shall be legal entities, whose purpose and reputation shall not pose any risk to the Group, whether in the financial, reputational and/or legal sense. Exceptionally, they may be granted to natural persons, provided it is an emergency situation and is authorized in the respective instances specified by each company.

In this context, the following guidelines should be considered for the assessment of potential beneficiaries:

- The delivery of any contribution, direct or indirect, to those who have been convicted of any of the crimes set forth in Law No. 20.393, which regulates the criminal liability of legal entities, is forbidden.
- It is forbidden to make contributions in cash, i.e., the physical delivery of money which may be made through wire transfer (prior identification and validation of the account of the applicant), check, sight draft or others that ensure the traceability of the contribution.
- Any contribution of movable or immovable property, or services shall have a monetary appraisal, and the value of the contribution shall be deemed to match such appraisal.
- Any contribution intended, directly or indirectly and by any means, to finance political activities of any kind, including campaigns for elected office, is forbidden.



· No contributions may be made to public institutions which are in a legal period of election campaign for positions of popular election and within three months prior to the beginning of such period. The foregoing, without prejudice to the contributions whose delivery is pending, i.e., that have been committed, approved and executed (if applicable), prior to said period.

· Donations or sponsorships may be arranged with social or political thought entities (think tanks), upon presentation of a project that represents a contribution to public policies, always in accordance with the guidelines established in this Policy. These contributions may only be made with the prior approval of the relevant Board.

The foregoing does not preclude the execution of agreements for the provision of services of limited duration, which aim at R&D in matters of interest to the company, provided that they meet the requirements of suitability and technical experience required in each case.

· Donations may be made to public bodies and/or entities, in compliance with the regulations governing each case.

· The delivery of contributions to public institutions required to grant relevant permits or authorizations (i.e., excluding routine permits that are usually requested) to projects of CAP Group companies is forbidden while the delivery thereof is pending and during the three months following the obtainment of the permit or authorization. This prohibition includes public entities that must submit their opinion in environmental impact assessment processes.



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