

CORPORATE PEOPLE POLICY  
**CAP GROUP**

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## 1. Our Purpose:

*We create well-being and shared progress by transforming resources with Chile and the world.*

At CAP Group, we foster a work environment that enhances personal development, ensuring fair, safe, and inclusive conditions that promote talent, integrity, well-being, and the sustainability of our operations. This policy outlines the principles under which the Group's People Management teams strive to bring this purpose to life, providing a guiding framework for the development of specific policies within each operating company, along with procedures that ensure consistent implementation in alignment with the strategy and culture of each organization.

## 2. Policy Objective

To establish corporate guidelines that ensure a common framework for all CAP Group companies in matters related to people and organizational development, fostering a modern, safe, sustainable, and inclusive management approach that advances corporate strategy, enhances productivity, and promotes the well-being of people.

## 3. Scope

This Policy applies to CAP S.A. and all group companies in which it holds, directly or indirectly, more than 50% ownership or control over financial and operational decision-making, and to all levels, including boards of directors, management, departments, processes, sub-processes, and/or activities related to people management and/or organizational development.

With respect to indirect subsidiaries in which CAP S.A. holds a lower ownership interest than indicated above or lacks such control, CAP S.A.'s People area will serve in an advisory capacity regarding the definition of policies, people-related risk management, and decision-making mechanisms for incentive systems and talent development, as adopted by the subsidiaries controlled by CAP in relation to the aforementioned indirect subsidiaries.

Each company within the Group must incorporate these principles into its policies, manuals, methodologies, procedures, and practices issued by their respective People management areas. Any significant deviations from this policy must be agreed upon and submitted to CAP S.A.'s People area and/or the corresponding corporate governance bodies.

People management areas must align their internal policies and procedures with this Corporate Policy, without prejudice to the specific legal, regulatory, or labor union considerations faced by each subsidiary.

## 4. Key Definitions

- **Organizational Development:** Processes, tasks, or procedures that involve (and are not limited to) one or more of the following actions: recruitment, selection, onboarding, training, performance management or evaluation, talent management, engagement management, diversity and inclusion initiatives, compensation, benefits, and the allocation of short- and long-term incentives for an organization's employees.
- **People Management:** Any action that directly or indirectly impacts organizational development processes, employee engagement and retention, and the management strategies adopted as the development framework for leadership teams.
- **Risks:** Events that may impact organizational development processes, potentially affect the continuity of an employee's role and/or influence the quality of life and overall well-being of employees at both the

individual and organizational level.

- **TNA (Training Needs Assessment):** Process through which the organization identifies employee training requirements, drawing on key inputs such as strategic planning, performance evaluations, competencies to be developed, and appropriate learning methodologies to address those needs.
- **Impact Assessment:** Mechanism used to evaluate the success or progress of one or more people development initiatives, based on the four-level Kirkpatrick methodology. It should include one or more of the following evaluations: learning outcomes (e.g., sample test at the end of a training or onboarding program), application checklists to verify behavioral changes in the workplace, and improvements in key business indicators (e.g., reduction in monthly accident rates after a training program, or higher retention of critical roles following a recognition program).
- **Recruitment and Selection:** Process that begins with identifying a vacancy and defining the requirements, competencies, and experience expected from potential candidates, who are then evaluated through a structured selection process with predetermined stages validated by the organization's management team.
- **Onboarding:** Process through which a new employee (or an existing employee assuming a new role) formally learns about the legal, procedural, technical, and/or cultural requirements associated with their position.
- **Training:** Mechanism for developing competencies—whether technical, interpersonal, or distinctive—that enable employees to meet the current or future requirements of a given role. Training may be delivered internally or externally and should include defined objectives, allocated hours, and evaluation mechanisms when deemed necessary in line with this policy's requirements.
- **Incentives:** Short- and long-term rewards designed to recognize both individual and organizational performance. Incentives are established based on strategic objectives approved by the Board of Directors and consider employee performance evaluations, which assess and rate both the achievement of goals ("what" was accomplished) and the demonstration of competencies ("how" it was accomplished).
- **Performance Management:** Formal process through which organizational leaders, supported by People Management teams, set performance objectives and competency development goals, provide timely feedback on progress, and evaluate their direct reports using all available evidence.

## 5. Foundations for Policy Development

This policy is grounded in the principles of legality, respect for human dignity, operational efficiency, and sustainability. Its foundation rests on: (1) compliance with applicable regulations, (2) alignment with international sustainability standards, and (3) the incorporation of industry best practices. Together, these elements provide a triple-impact framework for the operations of each of our companies.

- 1.1 **Legal Requirement:** Policies must guide the tasks and processes implemented within each organization to ensure compliance with applicable legal frameworks on people management, human rights, and occupational health and safety. These requirements translate into a series of actions (e.g., training and procedures) for personnel in various regulatory areas that organizations are obliged to meet. Nevertheless, CAP aims to go beyond legal compliance by adopting the best practices and people management standards that support the achievement of its strategic objectives.

**1.2 Sustainability Standard:** The Group's strategy is centered on sustainability and is therefore subject to national and international standards (e.g., SSIIndex and DJSI) that validate both its policies and stakeholder perception regarding social, environmental, and corporate governance matters, benchmarking their effective implementation in day-to-day operations. These standards go beyond the legal requirements established in the countries where the Group operates.

**1.3 Best Practices:** Organizations evolve and require continuous learning from the experiences of their employees in the workplace. Incorporating best practices from leading companies in sustainability and people management within similar industries enables the Group to address complex and global challenges through shared solutions.

## 6. Objectives in People and Organizational Development

- Foster a fair, respectful, inclusive, and safe work environment.
- Ensure business sustainability by developing strategic capabilities.
- Align people processes with organizational strategy, risk management, and culture.
- Measure the impact of people policies on business performance, workplace climate, and ESG outcomes.

## 7. Contents

### 7.1 Talent Attraction and Selection

The recruitment and selection process at CAP will be conducted under the principles of equity, transparency, merit, and traceability:

#### A. Profile Definition and Predictive Methods

- Profiles will be defined based on the requirements of the role and the business strategy, avoiding non-essential criteria that could result in indirect exclusion.
- Valid, reliable, and predictive evaluation methods will be applied to minimize bias and conflicts of interest, such as structured interviews, situational assessments, and standardized tools to measure leadership and potential.
- Specific psychological evaluations may only be used when the nature of the role justifies it, and always in compliance with applicable regulations.

#### B. Diversity, Inclusion, and Local Focus

- Priority will be given to candidates from historically underrepresented groups (women, people with disabilities, minorities, and local communities), as well as to the identification of internal talent.
- The recruitment order will be: (i) internal talent within the company and/or CAP Group, (ii) neighboring communities, and (iii) external talent.
- Concrete actions will be promoted to foster the inclusion of these groups, such as:
  - Ternas paritarias de género.

- Programas de atracción temprana y desarrollo de talento interno.
- Limitación de datos demográficos innecesarios en las postulaciones para evitar sesgos.

### **C. Training and Awareness**

- All individuals involved in selection processes must receive periodic training on unconscious bias, diversity, and inclusion.

### **D. Traceability and Auditability**

- Recruitment processes must include auditable records that allow for the evaluation of their traceability, compliance with inclusion criteria, and predictive effectiveness.
- The participation of multiple evaluators is recommended to reduce the risk of bias in the final decision.
- The hiring of Executive Committee members constitutes a process of high strategic and corporate governance relevance. Therefore, prior to the final hiring decision, the candidate shortlist and evaluation results must be reported to the Boards of Directors, ensuring that the selection aligns with the company's criteria of independence, suitability, and sustainability.

### **E. Transparency of Processes**

- All stages, criteria, and responsibilities of the process shall be documented and communicated to the relevant stakeholders.
- Applicants shall have access to clear information regarding job requirements, selection stages, and estimated timelines.
- Decisions must be based on previously defined criteria, applied consistently, and free from favoritism or conflicts of interest.
- The results of the process may be audited at any time by competent internal or external bodies.
- Internal referral programs may be implemented as a complementary mechanism for attracting talent, provided that referred candidates participate in processes under the same evaluation criteria, equity, and transparency as all other applicants. Every referral must undergo the established evaluations, and any hiring decision shall remain subject to the outcomes of the process.

## **7.2 Hiring**

Hiring shall be governed by the applicable legal framework, and it will be the responsibility of the People Management Department to ensure compliance. It is also their duty to verify the candidate's suitability for the position and the absence of any impediments (ethical, financial, etc.). Subcontracting must be duly justified and approved by the corresponding corporate governance body.

## **7.3 Onboarding**

Every new hire must undergo an onboarding process that enables effective integration into the organization

during their first 12 months. It is a shared responsibility of the People Management Department and the receiving area to ensure that the employee becomes familiar with internal regulations, corporate policies, and the specific functions of their role.

For critical positions, the onboarding process shall be more comprehensive and include additional actions such as:

- Integration sessions with key people in the organization.
- Visits to company facilities and relevant sites.
- Role-specific onboarding instances, such as coaching programs, mentoring, or accompaniment through a buddy system.

## **7.4 Competency Development and Learning**

The design of training programs shall be based on a systematic process of assessment of needs, aligned with the organizational strategy, legal requirements, and, when applicable, employees' career development plans. All training with strategic purposes must be evaluated according to its impact on organizational outcomes, considering operational, financial, cultural, and reputational dimensions.

The People Management Department shall be responsible for coordinating and ensuring the delivery of mandatory training, such as the prevention of workplace and sexual harassment, as well as training in diversity and inclusion. Furthermore, it must anticipate and support the development of employees at risk of automation or approaching retirement, strengthening their employability and future sustainability.

The training program shall incorporate a focus on future skills, sustainability, and adaptability to change. Funding will be defined by each company within the Group, ensuring in all cases the possibility of individual applications to training programs, whose relevance shall be evaluated and recommended as appropriate.

Impact measurement must include indicators before and after the training, assessing at least three levels—individual, organizational, and strategic—in accordance with recognized models such as Kirkpatrick or equivalent.

## **7.5 Benefits**

Benefits shall be aimed at promoting employees' physical, emotional, and cognitive health, as well as parental co-responsibility. This implies offering flexibility and support during critical moments in personal and family life, with an emphasis on the prevention and mitigation of risks. Each company is responsible for implementing mechanisms for the dissemination, training, and promotion of these tools, as well as for periodically evaluating their perception, use, and effectiveness. Such adjustments must be based on evidence of impact, socioeconomic context, and international standards of workplace well-being.

It is recommended to design benefit packages that take into account gender, cultural, and sociodemographic diversity.

## 7.6 Diversity, Equity, and Inclusion

CAP promotes and ensures equal opportunities and fair treatment for all individuals through its policies, statements, and actions. Diversity and inclusion are principles that strengthen employee engagement and talent attraction. People management actions must consider gender equity, the inclusion of persons with disabilities and/or those belonging to historically excluded groups (such as those recognized by international organizations: Indigenous peoples, migrants, the LGBTIQ+ community, among others), work-life balance, and intergenerational connections within the Group.

Each company shall report, within a maximum period of two years, on diversity indicators, pay gaps, and the participation of underrepresented groups, in accordance with DJSI standards or GRI 405. These actions must be aligned with internationally recognized corporate governance best practices.

## 7.7 Prevention of Workplace and Sexual Harassment

CAP maintains a zero-tolerance policy toward any form of workplace or sexual harassment, committing to create safe, inclusive, and respectful work environments. To this end, the following guidelines are established, going beyond legal requirements by integrating prevention, leadership, investigation, support, and follow-up.

### A. Prevention and Training

- Mandatory periodic training programs shall be implemented for all staff, focused on:
  - Raising awareness about workplace and sexual harassment.
  - Identifying inappropriate behaviors and associated risks.
  - Rights and responsibilities of employees and employers.
  - Tools for early intervention.
- Specific programs shall be developed for leaders and middle management, strengthening the CAP leadership profile with a focus on:
  - Prevention of abusive behaviors.
  - Ethical team management.
  - Active promotion of cultures of respect and equity.

### B. Communication and Reporting Channels

- Confidential, secure, and accessible communication channels shall be guaranteed, such as:
  - Ethics hotline and digital mailbox.
  - Designated offices for receiving complaints.
  - Direct contact with the People Management Department or the Ethics/Compliance Committee.
- These channels must:
  - Safeguard the confidentiality and protection of the whistleblower and the parties involved.

- Allow anonymous reporting when applicable.
- Provide timely information regarding the process and response timelines.

### **C. Investigation and Responsibilities**

- Every report shall be investigated promptly, impartially, and thoroughly.
- The People Management Department, in coordination with the Ethics Committee and Legal Affairs, shall be responsible for:
  - Conducting or overseeing the investigation.
  - Ensuring protective measures are applied throughout the process.
  - Recommending corrective actions and sanctions, if the allegations are substantiated.

### **D. Support and Post-Process Management**

- CAP commits not only to resolve the case, but also to addressing the subsequent consequences for all parties involved.
- A support period should be implemented, which may include:
  - Psychological support and guidance for the victim.
  - Workplace reintegration measures, when applicable.
  - Preventive follow-up to avoid retaliation or revictimization.
- The People Management Department shall be responsible for coordinating these actions and reporting to the Ethics Committee on the fulfillment of the support measures.

### **E. Leadership and Organizational Culture**

- CAP leaders have the duty to act proactively in preventing harassment, fostering a climate of trust where issues are addressed at an early stage.
- Ethical behavior and climate management indicators shall be included in leadership evaluations, as part of the CAP leadership profile.

### **7.8 Compensation and Incentives**

Compensation and incentives shall be defined by General Management and the People Management Department, based on market studies (e.g., GGS, HAY, IPE) and validated by the corresponding committee or Board of Directors. Structures must be updated at least every two years, using the 50th percentile of the market—or the benchmark determined by each company—as a reference. Short- and long-term incentives shall be linked to the achievement of corporate, company, and individual objectives, including financial, operational, ESG, safety, and competency results. Weightings will depend on each company, seeking a balance that prevents misalignments or counterproductive incentives. All incentive systems must be aligned with the corporate goals approved by CAP and audited annually, incorporating sustainability and ethical criteria where applicable.

### **7.9 Critical Positions and Succession**

Companies shall identify critical positions and maintain replacement plans on an annual basis, including internal or external successors, as well as mitigation plans when there is a risk of vacancy.

## A. Criteria

A position shall be considered critical if it is essential for operational or strategic continuity and entails a high replacement cost or talent scarcity. In addition, a contingency plan must be in place for the replacement of the CEO or key executives in the event of unforeseen departures, with due reporting to the relevant corporate governance bodies.

## B. Individualized Development Plans

- Identified employees shall have personalized development plans that include actions such as:
  - Rotations and challenging assignments.
  - Participation in strategic projects.
  - Mentoring, coaching, and leadership programs.
- These plans must be documented and subject to annual follow-up.

## C. Promotion of Diversity and Inclusion in Talent Development

- Succession and development plans shall incorporate specific objectives to promote diversity, ensuring that women, individuals from historically excluded groups, and employees from local communities have equal access to growth opportunities.

### 7.10 Occupational Health and Safety (OHS)

Group companies shall continuously identify the risks associated with occupational health and safety in their operations, establishing plans with objectives, indicators, and assigned responsibilities. These plans must implement policies, training, and recommendations to ensure safe working environments. In cases of high health impact (e.g., pandemics), the guidelines of national and international organizations must be applied.

Furthermore, CAP is committed to international OHS standards, including:

- Consultation and participation of workers and their representatives.
- Risk assessment and quantifiable action plans.
- Emergency response.
- Internal and external evaluations (e.g., ISO 45001).
- Incident investigation and continuous training.
- Inclusion of OHS criteria in procurement and contracts.

### 7.11 Performance and Talent Management

Performance management processes, talent matrices, and career plans must be aligned with the organizational strategy and consider evaluation results and competency development.

Each company shall establish annual objectives validated by its Board of Directors and manage continuous feedback processes (ideally digital), with final evaluations calibrated to ensure fairness and alignment across areas and companies within the Group.

For incentive purposes, evaluations shall be comprehensive, including financial, operational, ESG, safety, and competencies. Weightings must prevent imbalances and remain aligned with CAP's corporate strategic objectives.

## 7.12 Work Modality

Each company shall define its work modality, seeking a balance between organizational cultural development and individual well-being, in compliance with applicable legislation. These policies must be periodically updated based on internal evidence, generational trend studies, and work valuation hierarchies, ensuring flexibility while maintaining cultural cohesion.

It is recommended to establish principles of workplace flexibility, including agreed-upon schedules with flexibility arranged in coordination with the immediate supervisor.

## 7.13 Measurement of Culture and Workplace Climate

Companies should monitor the employee experience through quantitative tools (e.g., pulse surveys) and qualitative tools (e.g., focus groups, interviews), aligned with strategic objectives. This information will enable the anticipation of talent needs, the definition of future profiles, the adjustment of people processes, and compliance with regulatory requirements.

At least one continuous listening tool must be integrated into these processes, including ESG dimensions. Each company shall conduct an annual measure using an externally implemented tool that ensures validity and certifies ESG standards in line with the Group's objectives.

Any deviations in timing or content of this measurement must be agreed with the corporate center and approved by the corresponding company's Board of Directors.

## 7.14 Staffing Increases and Reductions

Staff reductions or terminations involving critical positions must be reported in advance to the Board of Directors, together with the rationale, associated risks, and mitigation measures.

Proposals for changes in the organizational structure that imply significant modifications to the organizational chart must be previously validated by the Board of Directors and the corresponding Committee.

In the event of any employee departure, the People Management Department shall:

- Coordinate the exit process with the relevant area.
- Ensure the return of equipment, credentials, and any company assets.
- Guarantee the cancellation of physical and digital access, as well as the safeguarding of corporate information according to the criticality of the position.

## 7.15 Labor Transition and Exit Value Proposition

CAP recognizes that the end of the employment cycle must be managed with respect and responsibility. Therefore, in cases of employment termination not associated with justified legal causes, the organization shall offer a minimum program of professional and emotional support to facilitate job reintegration, the development of employability skills, and preparation for future challenges.

The duration and scope of this support shall depend on the context and the financial situation of the company, applied on a case-by-case basis. Extended support should not be expected. This practice reflects CAP's commitment to sustainable labor relations, consistent with its sustainability strategy, reputation, and purpose as a responsible employer.

## 8. Responsibilities for the Application and Monitoring of the Policy

- **Board of Directors:** Approve and monitor the implementation and overall results of the policy.
- **Executive Senior Management:** Ensure its effective implementation within each company.
- **People Management Departments:** Operationalize and update management instruments.
- **All Managers and Supervisors:** Apply the principles and practices, model expected behaviors, and promote participation.

## 9. Approval and Update

This policy was approved by the Board of Directors of CAP S.A. in August 2025. It shall be reviewed at least every two years, or earlier if required by regulatory or strategic conditions.

## 10. Publication and Dissemination

The Corporate People Management Department is responsible for the dissemination, training, and accessibility of this policy through formal channels, onboarding processes, and leadership training.

## 11. Policy Availability

This policy shall be available through corporate digital channels and must be known by all managers, People Management areas, and employees of the CAP Group.