

1. PURPOSE

The company has implemented this Anti-corruption Policy to provide guidelines for all the employees of Toromiro to conduct pursuant to these principles and according to what the company expects and requires from its employees in their relationships with third parties, business partners, their coworkers, and particularly, public officers.

2. ANTI-CORRUPTION POLICY

4.1 Principles to conduct our work

We share the widely recognized idea that corruption is a serious hindrance to contemporary society's development as it undermines the rule of law and threatens the proper operation of free markets.

For this very reason, any expression or form of bribery or corruption is strictly prohibited in Toromiro. It is specifically prohibited, but without being limited to the following:

4.1.1. Regarding national or foreign public officers

- Give, offer, or accept giving undue/inappropriate benefits of any nature:
(Because of his/her public officer position)
- Wield improper influence on a public officer with whom the employee has a personal relationship (relative, friend, business partner, political bonds, etc.) in the expectation to obtain an advantage or beneficial result for Toromiro S.A. interests.
- Ask for or accept an advantage or any kind in return to improperly influence a public authority or officer.
- In any event, giving or offering gifts, favors, or services that, because of their value, exceptional features, exclusivity, or any other circumstances, can be considered outside the low-value and occasional present boundaries within the usual courtesy and common usage within the company social activities scope.

- Contribute in any actions for the public officer to take or deviate funds the public officer is accountable for.

4.1.2. Regarding business partners and third parties running or performing in private companies:

- Ask for gifts, advantages, or favors for oneself or a third party in connection with customers or suppliers with whom the company holds a business relationship.
- Offer, give or accept undue advantages of any nature expecting he/she breaches his/her function-inherent duties, make or abstain from making a decision that benefits the company, or cause detriment to any third parties.
- In any event, give or offer gifts, favors, or services that because of their value, exceptional features, exclusivity, or any other circumstances, that can be considered in excess of low value and occasional present within the normal courtesy and common usage within the company's social activities scope.

4.2 Main Anticorruption Processes, Policies, and Procedures

4.2.1 Interaction with Public Officers and Lobbying

The permanent interaction with public administration, state-owned companies, and different public officers is a day-to-day activity in Toromiro S.A. The company is geared towards promoting transparent interactions where any conflict of interest must be avoided, as well as any conduct that may be construed as an attempt to obtain undue considerations.

4.2.2 Facilitation Payment

A facilitation payment is understood as any payment made to a public officer to speed up public actions or routine procedures such as visa paperwork, permits, customs proceedings, etc. Facilitation payments are illegal in Chile; consequently, facilitation payments are prohibited at any place and time.

4.2.3 Interaction with other offerors or bidders amid a purchasing process between private entities

Toromiro S.A. is committed and promotes transparency and expects its employees to conduct accordingly within the applicable local laws. Consequently, any conflict of interest and conducts that may be construed as an attempt to obtain inappropriate consideration must be preempted/ruled out.

4.2.4 Conflict of interest

Toromiro has enforced a transparency policy in connection with the relationship the company develops with public and private business sectors in order to preempt and avoid any conflict of interests as defined in the Code of Ethics, thus guaranteeing the company's business decisions are exclusively the result of professional excellence in the company performance.

Gifts, Invitations, and Trips

As a general rule, Toromiro shall accept its employees to receive gifts or invitations and take part of trips provided that the following conditions are met:

- a) Receiving or giving gifts or invitations in certain times of the year, such as feasts or celebrations, may be considered a reasonable tradition; however, Gifts or invitations shall never be offered when a decision-making process is in progress.
- b) Never give any gifts or invitations which value exceed USD 20 (if of a higher value, the express authorization from the General Manager must be obtained)
- c) Gifts and invitations must have an exceptional nature.

Never accept, offer, or receive a gift or invitation which, for any reason, makes you feel uncomfortable or that could make the other person or his/her near circle feel uncomfortable. Under no circumstances shall any Toromiro's employee ask for gifts, invitations, or trips neither directly nor indirectly.

4.2.5 Donations and Sponsorships

It is prohibited to make any donations in cash as well as any donation or collaboration aimed at supporting political parties or campaigns or political activities of any kind, neither directly nor indirectly through any modality.

4.2.6 Fair Competition and Antitrust Regulations

We believe everyone benefits from a free, fair, and open market; consequently, it is strictly prohibited to carry out any action against the regulations ruling the free competition in our country.

- It is strictly prohibited to make agreements or enter into partnerships with other companies with the aim to fix sale or purchase prices or to set a formula to determine prices or any other similar practice.
- Predatory or unfair competition activities aimed at obtaining, maintaining, or increasing a controlling position in the market are not allowed.
- It is not allowed to take advantage nor unfairly use a predominant position, by fixing prices, imposing a product or service, or any alike activity.

4.2.7 Claims/Complaints, Investigation, and Sanctions

Any employee witnessing a breach of what is established in this policy or any other policies, processes, and related procedures is entitled to report such infringement through the Toromiro Claim Forum (<http://www.manuka.cl/escucha.activa>) or by e-mail at escucha.activa@manuka.cl.