



Corporate Anti-Corruption Policy



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1. Objective

This Corporate Anti-Corruption Policy (hereinafter, the “Policy”), applicable to Cencosud Shopping S.A. and all its subsidiaries (hereinafter collectively referred to as “Cenco Malls”), aims to establish the necessary guidelines for compliance with the applicable regulatory framework regarding anti-bribery and anti-corruption matters, as well as the obligations, objectives, and framework of action required for the development of Cenco Malls processes and activities within a context of business ethics and integrity.

In general, this Policy supports Cenco Malls commitment to conducting its operations in accordance with regulations that prevent, prohibit, and sanction corruption in all its forms and in its broadest sense, whether in the public or private sector, as well as other illegal or inappropriate behavior in business dealings. Accordingly, Cenco Malls expects all its members and third parties to reject any act of corruption, illegality, or actions that may appear unlawful, as well as any form of improper or dishonest behavior, whether involving public officials or third parties. Additionally, all individuals subject to this Policy must commit to carrying out their duties with the highest levels of integrity.

2. Scope

Cenco Malls Policy applies to all entities under its control, including subsidiaries, affiliates, and any other entity operating on behalf of Cencosud Shopping S.A. This Policy covers all activities and operations conducted by Cenco Malls, both nationally and internationally.

All Cenco Malls employees, including staff members, directors, contractors, consultants, agents, and suppliers, as well as any individual holding a position, function, or role within Cenco Malls, are subject to this Policy. Additionally, third parties acting on behalf of Cenco Malls, such as business partners and representatives, are expected to comply with the ethical principles and standards established herein. This also includes service providers and suppliers managing Cenco Malls affairs with third parties, whether or not they act as official representatives.

This Policy also extends to all business transactions and relationships with entities in both the public and private sectors, ensuring that all interactions are conducted transparently, ethically, and legally, with zero tolerance for corruption in any form.

Cenco Malls actively promotes the adoption and enforcement of this Policy through training programs, appropriate internal controls, and effective mechanisms for reporting and managing potential violations.



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4. Applicable Regulatory Framework

This Policy takes into consideration the applicable regulatory framework governing Cenco Malls activities, which includes, among others, the following regulations:

- Chilean Criminal Code.
- Law No. 20,393 on Criminal Liability of Legal Entities.
- Law No. 21,595 on Economic Crimes, which introduces various innovations in the socio-economic framework.
- U.S. Foreign Corrupt Practices Act ("FCPA").

In the event of a legislative amendment imposing stricter guidelines than those set forth in this Policy, such provisions shall prevail over this document. If any questions arise regarding the interpretation of the applicable regulations and their content, the matter should be referred to the Crime Prevention Officer.

5. Definitions

1. **Improper Benefit:** Any object or item, regardless of its nature, quantity, or economic value, that is offered, promised, or delivered without compensation to someone who is not entitled to it, or with the intention of influencing, inducing, or omitting an action or decision, including among others: cash, gift cards, donations, sponsorships or political, economic, or other contributions, employment or consultancy positions, discounts, debt forgiveness, stock transfers, bonuses, gifts, services, travel, entertainment, as well as offers and favors of any kind or nature.

2. **Corruption:** Any act carried out personally, directly, or through an intermediary and/or on behalf of or for the benefit of Cenco Malls, consisting of:

a. Giving, offering, or consenting to give an Improper Benefit to a public official, for their benefit or that of a third party: (i) due to the official's position or function (i.e., without compensation); (ii) to induce the public official to perform or for having performed an act inherent to their position for which they are not entitled to compensation; (iii) to induce the public official to omit or for having omitted a required act of their position, or to perform or for having performed an act in violation of their official duties; (iv) to induce the public official to commit any crime or offense applicable to public officials as established in the Chilean Criminal Code.



b. Offering, promising, giving, or consenting to give to a foreign public official: (i) an economic or other benefit for the advantage of the official or a third party due to the official's position; (ii) an economic or other benefit to omit or perform, or for having omitted or performed, an act inherent to their position, or in violation of their official duties.

c. Requesting or accepting an economic or other benefit for oneself or a third party, in order to favor or for having favored one bidder over another, or giving, offering, or consenting to give an economic or other benefit to a third party, for oneself or a third party, with the purpose of favoring or for having favored the selection of one bidder over another.

3. **Public Entity:** Includes any entity, institution, organization, or agency of the Chilean State, whether in the Executive, Legislative, or Judicial branches, at the national, provincial, municipal, or communal levels (or their equivalents or counterparts abroad), as well as international public organizations (e.g., World Bank, United Nations, etc.). This concept also includes public companies created by law, state-owned enterprises, and corporations in which the State holds equity participation or appoints board members.

4. **Public Official:** Any of the following persons:

a. Employees and officials of the Government of Chile or other countries, at the national, provincial, municipal, or communal levels (or their equivalents or counterparts abroad), whether part-time or full-time, elected, appointed, or hired, whether or not they receive compensation, and regardless of whether it is their sole occupation.

b. Any individual who sporadically or permanently exercises public functions, whether by popular election or appointment by a competent authority.

c. All individuals performing public functions at all levels and hierarchies, either permanently or temporarily, by popular election, direct appointment, competitive process, or any other legal means. Public function refers to any temporary or permanent activity, paid or unpaid, performed by a person on behalf of or in service of the State or its entities, at any hierarchical level and in any of its branches.

d. Any official serving in a public function or position, whether in central administration or semi-fiscal, municipal, or autonomous institutions, or in agencies created by or dependent on the State, even if not appointed by the President of the Republic or not receiving State compensation.

e. Any foreign public official or any official of a territorial entity recognized by Chile, including any individual appointed or elected to fulfill a public function at any governmental level or division, or in any agency, organization, or state-owned company where the government exercises direct or indirect influence.

f. Any individual who is an employee, contractor, agent, representative, official, member, or affiliate of, or who acts in relation to, on behalf of, in the interest of, or for



the benefit of, under the instruction or request of, or paid by, any part of one or more international public organizations (e.g., United Nations, World Bank).

g. Any individual who is an employee, contractor, agent, representative, official, member, or affiliate of, or who acts in relation to, on behalf of, in the interest of, or for the benefit of, under the instruction or request of, or paid by, any part of one or more local or foreign governments (regardless of whether they serve full-time or part-time, temporarily or permanently, by popular election or appointment, and whether or not they are remunerated).

h. Any candidate for public office in one or more local or foreign governments and any candidate for office in any international public organization.

i. Any individual who qualifies as a local or foreign public official or as an official of an international public organization, according to the applicable regulations in each case.

5. **Third Party:** Any individual or legal entity with whom Cenco Malls interacts commercially or seeks to do so, either regularly or sporadically, and who presents a certain level of risk due to the nature of their commercial activity. This includes—but is not limited to—the following individuals: customers, suppliers, vendors, agents, intermediaries, contractors, consultants, distributors, attorneys, advertising agencies, customs agents, business partners, among others.

Any terms used in this document that have not been expressly defined shall be interpreted in accordance with the definitions contained in the policies, protocols, and procedures that form part of Cenco Malls Crime Prevention Model and Corporate Anti-Corruption Policy.

6. General Prohibitions

Cenco Malls employees are responsible at all times for complying with all applicable laws and regulations in the countries, states, provinces, municipalities, and localities where the company conducts business. Ignorance of the applicable regulatory framework shall never be considered a valid excuse.

Failure to comply with the applicable regulatory framework can have extremely severe consequences for Cenco Malls, as it may face significant fines, disqualifications, and immeasurable damage to its reputation. Not only could Cenco Malls be affected, but its employees and collaborators individually as well, as they may be subject to criminal penalties, including imprisonment and fines.

Cenco Malls will never have any interest in violating this Policy or any applicable law. Compliance is mandatory, and any person failing to comply will be subject to the corresponding disciplinary measures, including termination of employment contract.



6.1 Payments, Promises and Offers

All Cenco Malls employees and Third Parties acting on behalf, for the benefit, or in representation of Cenco Malls are strictly prohibited from:

- (i) Offering, giving, or consenting to give an Improper Benefit to a Public Official to which they are not entitled, for themselves or a third party. It must be noted that any Improper Benefit offered to a Public Official or accepted by them may constitute a criminal offense, regardless of intent or whether a quid pro quo is proven. The mere act of offering or accepting the benefit, without requiring any specific action or omission by the Public Official as compensation, is sufficient to constitute an offense.
- (ii) Offering, giving, or consenting to give rights exceeding those legally granted to a Public Official due to their position, or an Improper Benefit, for themselves or a third party, to perform or for having performed an act inherent to their position for which they are not legally entitled to compensation.
- (iii) Offering, giving, or consenting to give an Improper Benefit to a Public Official, for themselves or a third party, to omit or for having omitted a required act inherent to their position, or to perform or for having performed an act in violation of their official duties.
- (iv) Offering, giving, or consenting to give an Improper Benefit to a Public Official, for themselves or a third party, to commit any of the ministerial crimes or misdemeanors established in the Criminal Code.
- (v) Offering, promising, giving, or consenting to give an Improper Benefit to a Foreign Public Official to obtain or maintain, for themselves or a third party, any business or advantage in the context of international transactions or any economic activity conducted abroad.
- (vi) Offering, promising, giving, or consenting to give an Improper Benefit to a Foreign Public Official to induce or for having induced the official to omit or perform an act inherent to their position or in violation of their official duties.
- (vii) Offering, giving, or promising a Public Official or another Third Party an Improper Benefit to induce them to perform or omit acts inherent to their position, either in violation of their duties or without breaching them.



In general, any payment, transaction, agreement, operation, or contract with a Public Official or any other individual or legal entity that serves as a conduit or means to facilitate, disguise, conceal, or obscure Improper Benefits or acts of Corruption is strictly prohibited.

It is also important to note that willfully ignoring reasonable suspicions regarding the conduct of an intermediary may constitute a violation of applicable regulations.

6.2 Facilitation or Expediting Payments

Under this Policy, Cenco Malls strictly prohibits its employees and Third Parties from making any payment to a Public Official to expedite or secure the execution of a routine act or administrative procedure within their responsibilities. These payments, known as facilitation or expediting payments, are considered a form of bribery and are strictly prohibited, regardless of the amount or frequency.

If a Cenco Malls employee or a Third Party acting on behalf of Cenco Malls is pressured to make such a payment, they must refrain from doing so and report the incident immediately. Any facilitation payment must be properly and promptly reported to the Crime Prevention Officer or through the established reporting channels at Cenco Malls. The report should include all relevant details of the incident, such as the date, the amount requested or paid, the name of the Public Official involved, and any other relevant information.

Cenco Malls is committed to thoroughly and confidentially investigating all reports of facilitation payments and taking appropriate disciplinary measures if a violation of this Policy is confirmed. Additionally, the company will implement corrective actions to prevent the recurrence of such behaviors.

Strict adherence to this Policy is essential for maintaining Cenco Malls integrity and reputation in all its operations and business relationships. Cenco Malls will provide ongoing training to its employees on the risks and legal implications of facilitation payments, reinforcing the company's commitment to ethical and transparent business conduct.

This Policy is available on the company's website: www.cencomalls.com.

6.3 Private Sector Corruption

In Chile, corruption is not only considered a crime when it involves Public Officials, but also when it occurs between private parties. Therefore, it is strictly prohibited for Cenco Malls employees or Third Parties to request or accept an Improper Benefit, for themselves or a third party, in order to favor or for having favored one bidder over another; to give, offer, or consent to give an economic or other benefit to a third party, for themselves or a third party, in order to favor or for having favored the selection of one bidder over another; to induce a person or entity to improperly favor or assist



Cenco Malls in obtaining or retaining business; or to gain any business-related advantage.

Principles for preventing private sector corruption in contracting include, as a way of illustration, the following, to which Cenco Malls fully adheres:

a. **Prohibition of Bribery and Improper Payments**

It is strictly prohibited to offer, give, receive, or request bribes, improper payments, or other Improper Benefits between private parties at any stage of the contracting process. This prohibition extends not only to the act of giving or receiving money, but also to any form of benefit or advantage, including gifts, favors, services, travel, discounts, employment promises, or any other form of compensation that is not legally and ethically justified. Furthermore, any attempt to influence contracting decisions through improper means is considered a serious violation of this Policy.

All individuals involved in the contracting process must act with integrity and transparency, ensuring that decisions are based on merit rather than undue influence.

b. **Fair Competition**

All parties involved must commit to competing fairly and ethically, avoiding corrupt practices to gain an unfair advantage in contracting processes. This means refraining from manipulation, deception, collusion, or any other practice that distorts competition and provides an undue advantage. Fair competition ensures that all bidders are evaluated under equal conditions, based solely on the quality of their proposals, their ability to meet contract requirements, and their history of ethical and legal compliance. Additionally, all parties must respect the rules and procedures established for the contracting process, ensuring transparency and fairness. Any attempt to improperly influence contracting decisions through bribery, favors, or the exploitation of personal or professional relationships is strictly prohibited and will be subject to disciplinary and legal sanctions. Promoting fair competition not only protects the integrity of the hiring process but also fosters a fairer and more sustainable business environment for all participants.

c. **Transparent Record-Keeping**

All transactions and agreements related to contracting must be accurately and transparently recorded, facilitating internal and external audits. This includes detailed documentation of every stage of the process, from requests for proposals to contract award decisions, and the execution of contractual terms. Records must contain complete and accurate information on bidders, evaluations, decisions, and any relevant communications. Maintaining updated and accessible records allows for efficient review by internal and



external auditors. Transparency in registration helps identify and prevent irregularities, ensuring that all actions and decisions can be verified and justified. Cenco Malls is committed to implementing control systems that ensure the integrity of recorded information and to fostering a culture of transparency and accountability among employees and business partners. Any omission, falsification, or manipulation of records will be considered a serious violation of Cenco Malls policies and may result in disciplinary and legal consequences.

d. **Confidentiality and Non-Collusion**

Participants must maintain the confidentiality of sensitive information and refrain from any form of collusion or anti-competitive collaboration. This means that all information obtained during the contracting process (including proposals, evaluations, negotiations, and other relevant data) must be treated with the highest level of confidentiality. Participants must not disclose, use, or exploit this information to gain undue advantages or harm other competitors. Additionally, any form of collusion—including agreements between competitors to manipulate contract outcomes, fix prices, divide markets, or engage in other anti-competitive practices—is strictly prohibited. Collusion and lack of confidentiality not only undermine the integrity of the hiring process but can also lead to severe sanctions, both internal and legal. Cenco Malls is committed to monitoring and preventing these practices through strict controls and a strong compliance culture. Employees and Third Parties must understand the severe consequences of violating these policies and act with integrity at all times.

e. **Objective and Non-Discriminatory Evaluation**

Contracting decisions must be based on objective and non-discriminatory criteria, excluding any undue influence that could favor one party over another. All proposals must be evaluated impartially, using clear, measurable, and relevant parameters, such as: quality, price, experience, technical capability, legal compliance, and any other relevant aspect that ensures the best choice for Cenco Malls. The evaluation process must be free of bias, favoritism, or discrimination based on race, gender, religion, sexual orientation, nationality, or any other legally protected characteristic. To ensure transparency and fairness, Cenco Malls will implement review and oversight mechanisms to detect and correct any irregularities. Adhering to these principles not only promotes a fair and equitable business environment but also strengthens Cenco Malls reputation as an entity committed to integrity and social responsibility. Any deviation from these standards will be treated with the utmost seriousness, potentially resulting in disciplinary and legal measures.



f. **Disclosure of Prior Relationships**

In accordance with Cenco Malls Code of Ethics, all individuals involved in the contracting process must disclose any prior relationships—whether family, financial, or otherwise—that could affect their impartiality. This disclosure must include any connection that could create an actual or perceived conflict of interest, ensuring transparency and compliance with ethical standards. Cenco Malls employees and Third Parties must immediately inform their supervisors or the relevant department of any prior relationship that could affect their ability to make objective and fair decisions. This includes, but is not limited to, relationships with family members, close friends, business partners, competitors, or any other connection that could influence the hiring process. Timely and complete disclosure of these relationships is crucial to maintaining the integrity of the process and ensuring that decisions are made in the company's best interest, free from undue influence. Failure to disclose personal, professional, or financial ties may be considered a serious violation of company policies, leading to disciplinary actions, including contract termination and legal consequences. Cenco Malls is committed to promoting a culture of transparency and accountability, ensuring that all participants understand the importance of disclosure and act accordingly.

7. Foreign Corrupt Practices Act (FCPA) Rules

7.1 Scope of the FCPA

The FCPA applies to the following individuals and legal entities:

- U.S. nationals and residents, as well as companies whose primary place of business is in the United States or that are incorporated under U.S. laws.
- Company officers, directors, employees, or agents, including shareholders acting on behalf of the aforementioned companies.
- Companies registered with the U.S. Securities and Exchange Commission (SEC) and therefore required to submit periodic reports to this regulatory body, including their officers and employees.

In light of the above, it is mandatory for Cenco Malls, its Directors, Senior Executives, and all its employees to comply with the FCPA and Cenco Malls Code of Ethics.



7.2 Prohibitions Under the FCPA

The FCPA prohibits the payment, offering, promising, or authorizing the payment of money or anything of value, including gifts or services, directly or indirectly, to:

Any non-U.S. Public Official or any department, agency, or instrumentality thereof; any non-U.S. political party, an official of such a party, or a candidate for public office outside the United States; any United Nations official or other public international organization employee; or any representative of a non-U.S. public official.

When such actions are intended to:

- Influence any act or decision of a Public Official.
- Induce a Public Official to perform or omit an act in violation of their duty to obtain an undue advantage.
- Persuade a Public Official to use their influence to affect an act or decision of a foreign government or international public organization.

These actions are prohibited whenever they are intended to secure an improper advantage or help Cenco Malls obtain, retain, or conduct business.

Additionally, reaffirming Cenco Malls commitment to preventing such conduct, Cenco Malls Code of Ethics strictly prohibits offering, promising, authorizing, or accepting any type of gratuity or gift, whether in cash or in-kind, to government authorities for the purpose of gaining any advantage.

Furthermore, the Code of Ethics emphasizes Cenco Malls commitment to honesty and transparency, urging vigilance against and prevention of activities related to money laundering, terrorist financing, and other crimes under Law No. 20,393. It also mandates reporting any suspected criminal activities within Cenco Malls through the company's official reporting channels, as recognized in this Policy.

7.3 Exceptions to the FCPA

The FCPA permits the payment, gift, offering, or promise of anything of value to Foreign Public Officials under the following circumstances:

- **Legitimate Business Expenses:** Payments for reasonable and bona fide expenses, such as travel and lodging costs, directly related to the promotion, demonstration, or explanation of a product or service, or the execution of a contract with a foreign government or public agency. Cenco Malls commits to ensuring that all such expenses are carried out ethically and in compliance with corporate policies.
- **Legal Under Local Laws:** Payments expressly permitted by the laws of the foreign country where the transaction occurs, without prejudice to Cenco Malls internal ethical standards. Regardless of local laws, Cenco Malls internal rules take precedence if they impose stricter requirements.



- Routine Government Actions (Facilitation Payments): Payments made to facilitate or expedite routine governmental actions by a Foreign Public Official, a foreign political party, or an official of such a party. "Routine governmental actions" include processing licenses, permits, visas, work authorizations, or providing public services such as electricity or water. However, Cenco Malls maintains a strict anti-facilitation payments policy: No payments, offers, or promises of money or anything of value to expedite government actions are accepted or permitted.

Regardless of FCPA exceptions, Cenco Malls Code of Ethics clearly states: "Cenco Malls has a strict policy against offering, promising, authorizing, or accepting any type of gratuity or gift, whether in cash or in-kind, to competent authorities to gain an advantage."

Any hospitality benefits offered to Public Officials—such as meals, transportation, or minor expenses—must comply with the procedures and policies of each business unit.

8. Payments to Public Officials

Notwithstanding that the acts mentioned in section 6.3 above are not prohibited by the FCPA, Cenco Malls employees must comply with the principles established in the Code of Ethics, this Policy, the Policy on Relations with Public Officials, and the Policy on Gifts and Invitations to Third Parties. It is imperative that all employees make every effort to avoid and minimize expenses or offerings to Public Officials and refrain from providing gifts, covering entertainment expenses, travel, or accommodation for such officials. These actions must be avoided as they may contravene the provisions of Cenco Malls Code of Ethics.

If it is not possible to avoid giving gifts or covering certain expenses for Public Officials, compliance with the general corporate or local procedures in effect, as well as the provisions of the Code of Ethics, is required. These procedures will define the necessary registration and control requirements to prevent any action that may conflict with the Code of Ethics and the applicable regulatory framework.

In case of any doubts or inquiries, employees must refer to the provisions of Cenco Malls Code of Ethics and applicable procedures, and/or consult the Crime Prevention Officer and/or the Legal Counsel of each country, who will act as Compliance Officers at the local level.

9. Receiving Gifts, Gratuities, and Invitations to Events

In accordance with Cenco Malls Code of Ethics and the Policy on Gifts and Invitations to Third Parties, a policy is established prohibiting employees from receiving gifts, presents, gratuities, incentives, commissions, or any form of



payment that could influence their impartiality or decision-making in their duties or constitute an Improper Benefit.

This policy aims to uphold integrity and transparency in all business relationships and prevent any conflicts of interest.

If an employee receives an offer of a gift, gratuity, or invitation to an event from a current or potential client or supplier, they must follow these procedures:

- a. **Immediate Notification:** The employee must immediately notify their direct manager about the received gift. The report must include the nature of the gift or gratuity, the name of the client or supplier, the relationship between the client/supplier and Cenco Malls, and the reason for the gift.
- b. **Formal Registration:** The manager must notify the Crime Prevention Officer in writing (via email). The notification must include full details of the client or supplier, the nature of their relationship with the company, and the reason for the gift or gratuity.
- c. **Symbolic and Promotional Gifts:** If a supplier provides symbolic or promotional gifts (merchandising) or gifts on special occasions such as Christmas, they must be reported to the direct manager. This notification must be made in accordance with the policies established by the Corporate Human Resources Management, which specify the limits and conditions under which such gifts may be accepted.
- d. **Additional Policies and Procedures:** Employees must adhere to any additional policies that may be implemented by the Corporate Human Resources Management and stay updated on the current guidelines regarding the acceptance of gifts and gratuities.
- e. **Inquiries and Doubts:** For any doubts or questions, employees should refer to Cenco Malls Code of Ethics. Additionally, they may contact the Crime Prevention Officer, the Corporate Human Resources Manager, or the Legal Manager for further guidance and clarification on how to handle specific situations.

10. Political Contributions / Support for Political Parties and Candidates

In accordance with applicable regulations, political contributions are strictly prohibited. While Cenco Malls recognizes the right of its employees to exercise their political rights, company resources, space, and image must not be used to promote or serve personal or political party interests.



Therefore, Cenco Malls employees who wish to exercise their political rights by participating in the country's political life and supporting a political organization or candidate of their choice must ensure that their statements and support are strictly personal and do not, in any way, represent or involve Cenco Malls institutional position.

11. Internal Records and Controls

Cenco Malls develops and maintains an internal accounting control system to ensure that transactions, payments, and any contributions made in connection with the matters covered in this Policy are duly authorized, recorded, and periodically audited. This includes books, accounts, financial records, accounting documents, and electronic storage devices, among others. The purpose of these controls is to ensure that Cenco Malls resources are not misused or allocated for improper or illegitimate purposes. Additionally, Cenco Malls will implement appropriate plans and programs to prevent, detect, and control any potential misconduct outlined in this Policy.

12. Third-Party Due Diligence

Cenco Malls acknowledges the commercial, economic, legal, and reputational implications that may arise from the actions of Third Parties it interacts with, in accordance with the applicable regulatory framework. In this regard, Cenco Malls seeks to engage only with qualified Third Parties that uphold specific standards of integrity and business ethics, particularly in transactions involving a Public Entity, whether national or international.

To ensure that Cenco Malls collaborates exclusively with Third Parties that meet these standards, the following measures will be implemented:

- a. **Evaluation and Reporting:** Conducting an integrity and background assessment of Third Parties by reviewing their history, reputation, business practices, and compliance with applicable regulations. If any incident or behavior is identified that may compromise these standards, a report will be made to enable a swift and effective response to potential irregularities.
- b. **Compliance Verification:** Ensuring that Third Parties have internal policies and procedures that guarantee compliance with relevant laws and regulations, as well as ethical and business conduct standards.
- c. **Continuous Monitoring:** Implementing a continuous monitoring system to assess the performance and conduct of Third Parties, ensuring they maintain integrity and ethical standards throughout the business relationship.



d. **Training and Awareness:** Providing training and awareness programs for Third Parties regarding Cenco Malls policies and applicable legal and ethical requirements to ensure their understanding and compliance.

e. **Contractual Clauses:** Including contractual clauses requiring Third Parties to comply with all applicable laws, regulations, and ethical standards in their operations. Additionally, they must immediately inform Cenco Malls of any situation, event, or behavior that could impact integrity and ethics in the business relationship.

It is essential to consider that under Law No. 20,393 (amended by Law No. 21,595 on Economic Crimes), Cenco Malls is exposed to risks stemming from activities carried out by individuals holding positions, roles, or functions within the company, as well as those providing services on its behalf when managing affairs with third parties, with or without formal representation.

Following the amendments introduced by Law No. 21,595 to Law No. 20,393, corporate liability has been expanded to include cases where a crime is committed by a second legal entity or by an individual associated with that second legal entity. This applies when (i) the legal entity to which the individual belongs provides services for managing the affairs of another legal entity with third parties, or (ii) when the legal entity lacks operational autonomy in relation to the other and there are ownership or participation ties.

Examples:

- For the situation described in (i): One of Cenco Malls subsidiaries hires a law firm to manage its legal affairs with third parties. If a lawyer from the firm commits a bribery offense in the course of their work, Cenco Malls could be held criminally liable, provided that all other elements of corporate criminal liability are met.
- For the situation described in (ii): One of Cenco Malls companies holds a majority stake in a subsidiary that lacks operational autonomy. If an employee of the subsidiary commits a bribery offense, Cenco Malls could be held criminally liable, provided that all other elements of corporate criminal liability are met.

13. Partnerships, Business Restructuring, and Asset Transfers

In compliance with applicable regulations, any partnership or collaboration agreement (e.g., joint ventures, associative agreements, or similar commercial arrangements) and business reorganization transactions (e.g., mergers, spin-offs,



acquisitions) and asset transfers involving Cenco Malls must undergo a due diligence review and must follow internal policies before final approval.

This is crucial because Cenco Malls could be held liable for past violations or sanctions of any company it acquires, merges with, or partners with for business development.

In particular, under Law No. 20,393, certain provisions apply when a legally convicted entity undergoes transformation, merger, or dissolution. In case of a confiscation (comiso), if a convicted legal entity is transformed, merged, or dissolved, any confiscation orders apply to the successor entity or its shareholders. In case of fines, the successor entity may be jointly and severally liable for fines imposed before the transformation; and if a for-profit entity is dissolved, fines may extend to shareholders or partners. Additional sanctions may be imposed on either individuals or legal entities, depending on the court's ruling. The scope of joint liability may be limited if it results in disproportionate harm to an innocent party. When a convicted entity transfers assets, confiscation and fines may extend to the acquiring entity up to the value of the assets transferred.

Consequently, it is an imperative policy for Cenco Malls to conduct due diligence processes that incorporate crime prevention criteria in accordance with this policy, including but not limited to the review of its activities and relevance of interaction with public officials, record-keeping policies and accounting analysis and compliance, its organizational structure and/or composition, recruitment policies, existence of past or present sanctions and/or investigations, among others. This review will initially indicate whether the target company has any weakness in relation to its accounting, record-keeping, and/or internal control and prevention procedures.

Any red flag or risk identified in such review or due diligence processes must be reported to the Crime Prevention Officer, as this will prevent Cenco Malls from being held liable for the actions or omissions of third parties.

14. Training

The Crime Prevention Officer, in coordination with the Legal Departments in each country where Cenco Malls operates, is responsible for training employees on this Policy.

15. Guidance

Whenever there is uncertainty regarding compliance or possible non-compliance with this Policy or the policies and procedures that are part of the Crime Prevention Model, the Crime Prevention Officer should be consulted, requesting their opinion on the matter without the need for it to be formally issued or sent.



For cases not explicitly covered in this Policy, the policies and procedures that are part of the Crime Prevention Model, or those involving the use of Cenco Malls resources and Public Officials, the Crime Prevention Officer must be consulted for further guidance before making a decision or carrying out the corresponding operation or activity.

16. Inquiry and Whistleblowing Procedure

Cenco Malls has a procedure in place for handling reports that can be submitted by employees, suppliers, and third parties regarding situations that may constitute or appear to be irregularities, questionable practices, non-compliance, or violations of Cenco Malls Code of Ethics, internal regulations, policies, procedures, and other internal rules.

This procedure is available to anyone who wishes to file a report through the company's designated channels until it is officially registered in the whistleblowing management platform provided by the Ethics Line Service Provider. The goal is to ensure that all reports are handled effectively and confidentially, in accordance with the procedures established to protect integrity and ethics within the organization.

The Crime Prevention Officer, in coordination with the Corporate Internal Audit Department, is responsible for analyzing reports received through the formal whistleblowing channels. The management and handling of reports will be conducted in accordance with Cenco Malls whistleblowing management procedure.

Cenco Malls has established the following formal whistleblowing channels:

- TOLL-FREE TELEPHONE LINE: Freephone number available for both employees and external parties during office hours: 800 914 601.
- WEBSITE: Whistleblowing Portal: Canal de Denuncias – Cenco Malls (<https://www.eticacencomalls.com>).
- EMAIL: Corporate email address where Cenco Malls employees and external parties can send reports, which will be reviewed exclusively by an independent third party: linea.etica@cencomalls.com. Additionally, reports or inquiries can be directed to Cenco Malls Compliance Department at: prevención.dedelitos@cencomalls.cl.
- WHATSAPP: Phone number for submitting reports via WhatsApp: +56 2 3215 0270.
- VIRTUAL MEETINGS: Confidential, one-on-one virtual meetings can be requested via linea.etica@cencomalls.com.



These formal whistleblowing channels are the only methods authorized by Cenco Malls for employees and Third Parties to report violations of internal policies, including this Policy and Law No. 20,393.

17. Disciplinary Actions and Measures

Any violation of this Policy may have serious consequences for Cenco Malls, its employees, and Third Parties, affecting them economically, commercially, legally, and reputationally. Employees of Cenco Malls who are found to have violated this Policy or any other applicable company policies may be subject to disciplinary action in accordance with internal company regulations. These internal sanctions are in addition to any civil or criminal penalties prescribed by local legislation.

18. Registers

› Review History, Changes, and Validity

Version	Effective date version/revision release date	Start and time of version/revision (*)	Description
No. 2	07/29/2024	5 years from 07/29/2024	Updated in accordance with the requirements of Law No. 21,595 on Economic and Environmental Crimes



> Approvers Register

Version	Effective date version/revision release date	Full Name	Position
No. 2	07/29/2024	Macarena Riquelme	Compliance Officer and Crime Prevention Officer..

> Referral Register

Version	Effective date version/revision release date	Full Name	Position
No. 2	07/29/2024	Macarena Riquelme	Compliance Officer and Crime Prevention Officer..