

	CORPORATE ANTI-CORRUPTION AND ANTI-BRIBERY POLICY	CODE: COR-I-PO-CI-10 PAGE: 1 de 10 DATA VERSION: 25/06/2026 VERSION: 5
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1 Purpose

This Anti-Corruption and Anti-Bribery Policy (hereinafter the "Policy") of SONDA and its Affiliates (hereinafter "SONDA") aims to establish guidelines to prevent, detect, and sanction acts of corruption and bribery; to serve as a guide on how to conduct negotiations ethically and with integrity; to encourage employees in the fight against corruption and bribery; and to create spaces for knowledge on this matter.

This Policy complements SONDA's Code of Ethics and Conduct and establishes the obligation to comply with anti-corruption and anti-bribery regulations in each subsidiary. Subsidiaries that, due to legal or regulatory requirements, must have their own policy, must align it with this corporate policy.

This policy aims to lay the groundwork for:

1. Prohibit bribery in all its forms.
2. Comply with legislation related to bribery and the fight against corruption.
3. Align our Anti-Bribery Management System with the organization, its plans, and its context.
4. Establish, review, and verify compliance with our anti-bribery objectives through context analysis, organizational plans, and monitoring by the Governing Body, Senior Management, the Compliance Function, and other relevant stakeholders.
5. Provide the resources to meet the requirements of the Anti-Bribery Management System and continuously improve its operation.
6. Promote a culture of ethics and transparency in decision-making and relations with third parties.
7. Encourage and promote the raising of concerns, whistleblowing, and actions against corruption and bribery without fear of retaliation, provided that such actions are based on a reasonable belief or good faith.
8. Continuously improve the Anti-Bribery Management System.
9. Ensure the independence, autonomy, and authority of the Anti-Corruption and Anti-Bribery Compliance Function, without interference from other areas or interests, so it can effectively perform its duties without conflict.
10. Identify and assess the bribery risks to which the organization may be exposed and implement the necessary mitigation measures.
11. Establish clear rules and procedures to prevent and detect any form of bribery within the organization.

12. Train and raise awareness among employees and collaborators about the ethical and reputational legal implications of bribery.

13. Conduct periodic audits and reviews to ensure policy compliance and effectiveness of established controls.

14. Demonstrate the organization's commitment to integrity and social responsibility, which can enhance its reputation and strengthen its position in the field.

15. Take measures, including filing appropriate reports and imposing suitable sanctions, in response to any violation of this policy.

2 Scope

The policy applies to all persons who are part of or directly or indirectly relate to SONDA, such as collaborators, directors, executives, suppliers, and contractors

3 Related Processes

Not applicable

4 Related Documents

- Code of Ethics and Conduct
- Corporate Gifts and Entertainment Policy
- Corporate Government Relations Policy
- Corporate of Donations Policy
- Corporate Policy on Sponsorships, Endorsements, and Social Contributions
- Crime Prevention Model (Chile)
- Corporate Due Diligence Procedure for SONDA and Its Subsidiaries' Clients
- Corporate Due Diligence Procedure for Suppliers of SONDA
- Corporate Due Diligence Procedure New Collaborators
- Corporate Whistleblowing and Complaints Handling Procedure
- Conflicts of Interest Corporate Policy SONDA and subsidiaries

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5 Responsibilities

5.1 Policy Approval Officer

The person responsible for approving this policy is the Directory of SONDA S.A.

5.2 Responsible For Implementing Policy

- **Directors:** Promote the Anti-Corruption and Anti-Bribery Policy. Appoint the Compliance Officer and ensure their independence and autonomy.
- **General Manager:** Allocate sufficient and appropriate resources to support the Crime Prevention Officer, promote a culture of integrity and compliance in the organization, and encourage the use of the whistleblowing channel.
- **Ethics Committee:** Address issues and conflicts related to ethics and integrity and implement appropriate disciplinary actions when necessary.
- **Compliance Officer:** Ensure adherence to the policy, develop and oversee the Crime Prevention Model and report on compliance performance to the Board of Directors.
- **Collaborators:** Participate in compliance training programs, adhere to SONDA's Anti-Corruption and Anti-Bribery Policy and Code of Ethical Conduct and comply with all related requirements. Report and encourage the reporting of actions that violate the policy. Proactively support the Compliance Officer work by granting access to meetings, documents, relevant information, follow-up activities, etc.

6 Anti-corruption and Anti-Bribery Attribution

The Anti-corruption and Anti-Bribery Function at SONDA is performed by the Compliance Officer, who is formally appointed by the Company's Board of Directors. This position reports directly and independently to the Board of Directors and is provided with the autonomy, resources, and authority necessary to carry out its responsibilities without interference from operational areas.

In carrying out its responsibilities, the Anti-corruption and Anti-Bribery Function is responsible for:

- Ensuring that the Anti-Bribery Management System is designed, implemented, maintained, and continually improved in accordance with the requirements established by applicable regulations and this Policy;
- Reporting periodically, at least annually and whenever necessary, to the Board of Directors and Senior Management on the performance, effectiveness, and status of the Anti-Bribery Management System;
- Independently overseeing the design, implementation, and operation of the Anti-Bribery Management System throughout the organization;
- Providing advice, guidance, and support to personnel and relevant stakeholders regarding compliance with the Anti-Bribery Management System and the management of bribery risks;
- Promoting a culture of integrity and compliance throughout the organization by fostering the prevention, detection, and response to bribery-related situations;
- Having direct access to the Board of Directors to report significant matters, including instances of non-compliance or significant bribery risks;
- Safeguarding the confidentiality of information received and ensuring the proper management of the whistleblowing reporting channel.

7 Policy Description

SONDA categorically prohibits any act of corruption including any type of bribe, facilitation payment or other improper benefit, against national or foreign public officials or in commercial relations with the private sector.

Regarding third parties, SONDA will only conduct business with people or companies after a background verification on their probity is performed by the Compliance Department.

The policy defines SONDA's corporate guidelines. However, the branches will be able to add applicable, specific local standards that are considered necessary to incorporate, in accordance with their own commercial activities. In any case it can be less strict than the present policy.

7.1 Principles of Action

Regarding bribery and facilitation payments

Collaborators shall not receive, offer, or deliver directly or indirectly payments in cash, in kind, commissions or any other undue benefit for the service of public or private entities, political parties, public offices or candidates for public office, with the intention of illegally carrying out or maintaining financing, investments, negotiations, undue advantages and any other that could be interpreted as a possible crime of bribery and corruption.

On Gift and invitations

It is prohibited to give, receive, or agree to gifts or invitations, except for those permitted under the specific policy for such matters.

Regarding donations

It is established that SONDA does not authorize donations.

Regarding Representation Expenses

All requests must be made in accordance with the guidelines indicated in the Expense Policy and Procedure.

Corporate Policy on Sponsorships, Endorsements, and Social Contributions

SONDA will promote initiatives of contributions to the community that promote social, environmental and cultural development through formally constituted institutions duly authorized to receive such grant by virtue of current legislation. In no case should these be used for acts of bribery or corruption.

Regarding conflicts of interest

SONDA's collaborators may be exposed to conflicts of interest, which does not necessarily mean acts of negative connotation, to the extent that they are previously dealt with and resolved in a timely and appropriate manner.

Conflicts of interest arising from financial interests of a SONDA collaborator with third parties (suppliers, contractors, customers, business partners), must be analyzed and evaluated by the Compliance Area. If the case involves a director, chief executive, or related company, it shall be submitted to the Committee of Directors for consideration.

Conflicts of interest between current collaborators or that may arise after the entry of the collaborator, will be treated, and resolved by the People Management area.

Regarding public officials

Due to the nature of SONDA's operations, the relationship with public officials is recurrent and necessary for the continuity of the business.

To ensure effective compliance with the principles of objectivity, impartiality, neutrality and transparency, any offer to a public official should be understood as a manifestation of courtesy

and good manners. Therefore, you may only offer, accept, or consent to gifts or invitations that are institutional in nature and within reasonable limits.

When interacting with a public official, employees must be aware of and strictly comply with the following policies and procedures:

- Code of Ethics and Conduct
- Corporate Gifts and Entertainment Policy
- Corporate Government Relations Policy
- Corporate of Donations Policy
- Corporate Policy on Sponsorships, Endorsements, and Social Contributions

7.2 Regarding Business Partner and Manager or Workers of Private Companies

SONDA does not allow the following misconduct in relations with business partners and private companies:

- Request gifts, benefits, or favors for yourself or for a third party with whom the company has business relationships.
- Offer, accept or consent to undue benefits of any nature.

Misconduct with business partners cannot be carried out even when it facilitates business, management, or operations, allows global or individual goals to be achieved, improves the position of the company to access authorities or officials, or is ordered by a boss, manager or a third party.

Agreements or concerted practices that prevent, restrict or hinder free competition are not permitted.

7.3 Trainings

Every employee who joins SONDA must undergo mandatory training in the Code of Ethics and Conduct.

The training will be conducted via e-learning and must be completed annually whenever there are significant updates to the Code of Ethics and Conduct.

On a monthly basis, the Compliance Officer will monitor the level of compliance of this and other requested trainings in matters of corruption.

Failure to complete this mandatory training will be considered a breach of corporate provisions and will result in the application of disciplinary measures according to the following stages:

1. Initial Notification:

A reminder email will be sent to employees who have not accessed the course. This notification will be sent monthly as long as the noncompliance persists.

2. Notification to the Manager:

If the employee remains non-compliant despite the notification sent by email, beginning in the third month, the situation will be reported to their direct manager.

7.4 Report Investigation and no Retaliation

Employees who have information about real intentions or suspicions of corruption, bribery, or violations of the anti-corruption and anti-bribery policy or the anti-bribery management system, must report them immediately on the Reporting Channel, in accordance with the Corporate Reporting Procedure.

Complaints about real intentions or suspicions of bribery or violations of the anti-bribery policy will be investigated in a timely and appropriate manner, and the complainant will be informed about the result of the investigation.

SONDA will ensure that investigations are carried out confidentially and that measures are taken to protect the complainant from any retaliation or disciplinary measure.

If it is determined that a member of staff has taken retaliation against a whistleblower.

7.5 Audit

Internal Audit Management, within the scope of its independent assurance function, will conduct periodic reviews of the organization's relevant operations to evaluate compliance with this policy and the Anti-Bribery Management System.

The results of these reviews will be reported directly to the SONDA Board of Directors, demonstrating independence in this matter.

The auditors, in compliance with their role, must act in an integral, impartial and independent manner, thus demonstrating the ethical compliance that the organization establishes in application of this Policy.

It is the duty of all SONDA collaborators to grant the facilities and provide the required cooperation to the audit activities or investigations related to bribery that the organization is developing and not to miss the truth or obstruct the execution of these activities.

7.6 Anti-Corruption and Anti-Bribery Objectives

The following anti-bribery objectives have been defined for the purpose of measuring the performance of the anti-bribery management system:

- Monitor training completion rates to ensure required levels are met
- Ensure compliance with the company's current policies and procedures regarding bribery prevention
- Prevent and detect instances of bribery within SONDA
- Ensure employees are familiar with SONDA's anti-corruption and anti-bribery policy.

These objectives will be reviewed quarterly by the Compliance Officer and presented to General Manager once a year.

7.7 Consequences of Non-Compliance

Violation of anti-corruption laws applicable to SONDA can lead to severe civil and criminal penalties, as well as significant damage to the company's reputation. Employees who breach these laws may also face severe civil and criminal consequences, including imprisonment. The prohibition against bribery is incorporated into the SONDA Internal Regulations (applicable to relevant subsidiaries), meaning a violation of this policy may also result in disciplinary actions under these regulations, up to and including termination of employment.

8 Terminology

- **Corruption**: Abuse of positions of power or trust for personal benefit to the detriment of collective interest, carried out through offering or requesting, giving or receiving goods or money, whether in kind, services, or benefits, in exchange for actions, decisions, or omissions.
- **Bribery**: Offering or agreeing to offer a public or private official an economic benefit or other kind of advantage, directly or indirectly, for oneself or a third party, in order for the official to commit an omission or expedite the performance of an action within their duties.
- **Facilitation Payments**: Any payment or gift made to a public official or private to obtain or expedite the performance of an action that is within his or her scope of work.
- **Undue Advantage**: Any object or benefit consisting of an economic or other benefit, which is used to gain the will of the bribed party. These include assistance or support to family members, scholarships, meals, contributions to political parties or campaigns, concessional

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credits, discounts on products, money, entertainment invitations, travel payments, job offers, debt payments, business participation, gifts, and personal or sexual benefits.

- **Conflicts of Interest:** Potential situations, real or apparent, in which a private matter or personal motivation may unduly influence the proper exercise of their functions and the making of objective decisions.
- **Public official:** Any public sector manager or employee who serves in a government, municipal, or public international organization tax or semi-fiscal service.
- **Business partners:** Any person or organization external to the company with which it is established, or plan to establish, some form of business relationship. It includes customers, suppliers, contractors, consultants, subcontractors, advisors, representatives, or others.

9 Change Control

Version	Description of the change	Author	Date
3	Version 03	Valeria Salazar	01/08/2024
4	Unification of Anti-Corruption and Anti-Bribery Policies	Valeria Salazar	01/03/2025
5	• The objectives of the Anti-Bribery Management System are modified. • The anti-bribery compliance function is modified. • Disciplinary measures for failure to complete mandatory training courses have been updated.	Fredy Cifuentes	09/06/2026

Documentary Approval

Review	Mónica Varela	Approval	Directory SONDA S.A.
Role	Compliance Officer	Role	Directors
Date	09/06/2026	Date	25/06/2026

Validity of the document	1 year from the release date
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