



CODE OF CONDUCT FOR SUPPLIERS

2024

Creation: June 2022

Last update: June 2024

I. INTRODUCTION

One of the main values that guide the behavior of CMPC (hereinafter and interchangeably "the Company") is respect for people. This is manifested, for example, in the promotion of close connections and by treating our suppliers in a fair and dignified manner, always making sure that relationships are based on impartiality, objectivity, transparency and accountability. Selecting and/or awarding suppliers and any other commercial and/or technical decision are always based on objective, general and uniform criteria, without permitting any arbitrary or discretionary actions, preferential treatment or undue advantages.

The Company bases its operations on a strong culture of integrity, responsibility and excellence, building relationships with suppliers that adhere to its policies, practices and standards of ethics and sustainability, thereby helping achieve company objectives. For CMPC, managerial excellence includes the integral, responsible and loyal conduct of every collaborator and all of our suppliers. Ethical conduct and strict observance of the law favors the establishment and maintenance of relationships based on trust, respect and credibility with our counterparts, including suppliers, customers, communities, investors and other Company stakeholders.

II. OBJECTIVE

Through this Code of Conduct for suppliers (hereinafter and interchangeably "the Code"), supplementary to the provisions of the respective contracts and agreements in force, CMPC hereby sets out the guidelines that must govern supplier conduct and behavior, which must be observed at all places and times within the framework of the relationship they maintain with the Company.

III. SCOPE

This Code is applicable to all suppliers without exception regardless of size, country or subsidiary status of the CMPC group they are connected to, without prejudice to the corresponding local contractual, legal and regulatory requirements.

IV. GENERAL PRINCIPLES

a. Compliance with the Law

The suppliers must strictly comply with all the laws and regulations in force in the countries where they pursue business dealings and/or operations, including those of a labor, environmental and tax nature, inter alia. They must also cooperate in a timely, proactive and transparent manner with local authorities.

b. Ethical Remuneration

The Company requires suppliers to pay their workers who provide services to the Company no less than the amount that CMPC has set as the common minimum wage for its operations or jobsites, and must make all reasonable and possible efforts to ensure that employees who provide services to CMPC receive remuneration above that amount.

c. Respect for Human Rights

The suppliers will conduct their businesses with full respect for and protection of the fundamental human rights of individuals (internationally recognized and enshrined in the Guiding Principles of the United Nations Organization), allowing them to develop their talents, knowledge and skills without any discrimination, harassment or unequal treatment based on category, be it political, gender, religion, ethnic origin, disability, or sexual orientation, promoting the principle of equal treatment, as indicated in the Company's Human Rights Policy (available at www.cm³pc.cl). In addition, the suppliers undertake not to engage in acts that qualify as abuses against Human Rights or the Right to Equality and Non-Discrimination, either directly or by omission.

The suppliers must respect the right of workers to bargain collectively and to form, without prior authorization, such trade union organizations as they deem appropriate in whose incorporation and operation the applicable legal norms shall be fully respected. The suppliers must also refrain from using child labor and all forms of forced labor.

d. Health and safety

The suppliers must inform and train their workers about the elements, products and substances to be used in production processes or on the job, and with respect to the identification and handling of hazardous items and products, their permissible exposure limits, health hazards, and paying very close attention to the control and prevention measures required to mitigate such risks, thereby preventing any harm to health and safety from occurring.

At CMPC, no work shall be undertaken without safety being fully respected first and foremost, for which purpose all suppliers must adhere to the values, regulations and critical health and safety procedures in force.

e. Environmental Protection

The suppliers must use the utmost diligence and care to protect the environment in the areas where their businesses and operations are pursued. They also undertake to apply what is known as the "Precautionary Principle" in any situation where the potential environmental impacts of their actions are unknown, as established in the document "Universal Minimum Standards for the supplier of Goods and Services" or any other that may come to replace it.

The suppliers must comply with all the environmental standards that CMPC has signed on to, through its commitments and various international certifications to which it adheres.

Suppliers must actively work to reduce greenhouse gas emissions and energy consumption in their operations. They should implement measures to improve energy efficiency, promote the use of renewable energy sources and adopt environmentally friendly practices to minimize their carbon footprint.

In addition, suppliers must have robust pollution prevention and waste management systems. This includes implementing measures to prevent pollution, properly manage and dispose of waste, and promote recycling and reuse practices.

In addition, suppliers must strive to achieve efficiency in the use of resources, minimizing their consumption of natural resources, optimizing the consumption of materials, and implementing strategies for the sustainable management of resources in all of its operations.

The suppliers must prevent all manner of environmental harm and, in the event that anything of such nature were to occur, whether or not in connection with the services and or products they provide, they must immediately notify the Company and execute all of the mitigation measures to reduce any impacts.

Suppliers must not deforest or degrade the forest and native vegetation, and they must promote biodiversity conservation.

The suppliers must foster commitment to the Sustainable Development Goals promoted by the United Nations.

Our suppliers must have a sustainable procurement policy for their own suppliers.

V. INTEGRITY AND COMPLIANCE

a. Corporate Probity

CMPC has a Corporate Probity – Integrity Policy (available at www.cm3pc.cl) that sets out the minimum standards of behavior that the Company expects and requires from its collaborators, suppliers and other partners to handle the potential risks of corruption to which the development and operation of its business dealings may be exposed. Furthermore, CMPC expressly rejects and prohibits rejects and expressly, absolutely and categorically prohibits all forms of corruption, bribery and other conduct contrary to the principles and values of the Company.

The suppliers must administer their business dealings while refraining from any conduct that constitutes or may constitute an act of corruption or bribery, as well as any other form of undue influence through which they would seek to obtain undue advantages or preferential treatment.

b. Free Competition

CMPC has an Integrity Policy – Free Competition (available at www.cmpc.cl), which establishes the minimum standards of behavior that the Company expects and demands from its collaborators, suppliers and other partners to prevent the commission of anti-competitive conduct in the different markets in which it participates.

Therefore, CMPC expressly rejects and prohibits any act or conduct contrary to the laws and norms that regulate and protect free competition.

The suppliers must administer their businesses autonomously and independently, in total respect of the laws and norms that regulate and protect free competition, adopting their decisions based on general, objective and uniform criteria.

c. Crime Prevention Model (applicable to Chilean subsidiaries)

In accordance with the provisions of Law No. 20,393 and in the exercise and fulfillment of its duties of management and supervision, CMPC has designed, adopted and implemented a Crime Prevention Model (available at www.cmpc.cl whose purpose is to prevent the commission of the crimes indicated in the aforementioned law.

d. Conflict of interests

Behavior that is in line with an interest other than that of the Company's, be it personal or that of a third party, that could seriously affect CMPC's assets, reputation and/or business objectives.

In the event that a supplier identifies a situation that gives rise to a conflict of interest with CMPC directors, executives and/or collaborators, be it existing, potential or apparent, it must be immediately, expressly and formally declared to the Company prior to taking any action while refraining from participating in decision-making on matters affected by the conflict and/or exerting influence over the persons responsible for making them.

e. Economic sanctions

CMPC conducts its business around the world with strict observance of economic sanctions and other international trade restrictions imposed by the United Nations (UN) Organization and other countries in which it markets its products. The Company expects and requires from its suppliers full compliance with said sanctions and restrictions, thereby guaranteeing full indemnity of its liability, assets and reputation.

f. Data Protection

CMPC complies without restriction with all applicable laws and regulations that safeguard and regulate Personal Data protection in all jurisdictions where it operates or maintains business relationships, including international best practices in the matter. Thus, the Company expressly rejects and prohibits any act contrary to said laws, regulations and practices.

The suppliers undertake to use the personal information to which it has access in accordance with the laws and regulations in force, in particular Law No. 19,628 on the Personal Data Protection (subsidiaries in Chile), as well as in keeping with the best international standards and practices in this matter, obliging itself to its due care and protection with the utmost diligence, being liable for compensating the owners of the respective data for any pecuniary losses and moral damages that may arise from the improper treatment of the personal data, as defined in said law.

g. Whistleblower Hotline

CMPC has a whistleblower mechanism, directly accessible at <https://lineadenuncia.cmpc.cl/> or through CMPC's corporate website. This tool is available to collaborators, suppliers and third parties in general. Complaints may be made anonymously (where permitted by local legislation) and due confidentiality will be maintained throughout the investigation process.

The supplier must report via this mechanism any occurrence, action, conduct or circumstance that constitutes or may constitute an infringement of this Code and, in general, the principles and values of CMPC, as well as all laws and regulations in force.

VI. INFORMATION CONFIDENTIALITY

The Suppliers undertake to maintain strict confidentiality of the information provided by CMPC, applying the same zeal with which it ensures the safeguarding of its own information, as regulated in detail in the agreements and contracts signed with the Company.

VII. INTELLECTUAL AND INDUSTRIAL PROPERTY USE OF SYSTEMS

The suppliers shall respect the intellectual and industrial property rights of CMPC, being obliged to immediately report any infringement or possible risks to the company. In the event that a supplier has access to CMPC computer systems, it shall use them exclusively for the purposes entrusted to it, and must protect the use of access codes and the intellectual and industrial property rights of third parties.

VIII. COMMUNITY RELATIONS

CMPC makes a serious and proactive effort toward outreach, joint work and open doors with neighbors and communities with which it interacts in the pursuit of its business dealings and operations, with the ultimate goal of generating shared value. Therefore, in the event that a supplier becomes aware of any complaints, apprehensions or concerns of communities or neighbors of CMPC, it must immediately and formally report it to the Company through the whistleblower hotline (<https://lineadenuncia.cmpc.cl/>). Likewise, the suppliers undertake to maintain an attitude of respect towards the community and neighbors, serving as a concrete contribution to local communities through actions that benefit or aid its direct neighbors, especially in support of keeping good relationships with stakeholders.

IX. CODE COMPLIANCE

This Code is understood to be an integral part of the contracts that the Company signs for that purpose with its suppliers. Therefore, failure to comply with this Code constitutes a serious breach of such contracts and would give rise to the application of any penalties or legal actions that these and applicable local legislation envisage.



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