



# CODE OF CONDUCT FOR SUPPLIERS

YEAR 2022



## I. INTRODUCTION

One of the main values that guide the actions of CMPC (hereinafter and indistinctly "the Company") is respect for people, which is manifested, among other aspects, in the promotion of close links and in the granting of treatment fair and dignified to our suppliers, ensuring at all times a relationship based on impartiality, objectivity, transparency and responsibility. The selection and/or award of the same, as well as any other commercial and/or technical decision, is always based on objective, general and uniform criteria, with no room for arbitrary or discretionary actions, preferential treatment or undue advantages.

The Company bases its operations on a strong culture of integrity, responsibility and excellence, linking with suppliers that adhere to its policies, practices and standards of ethics and sustainability, thereby contributing to achieving its objectives. For CMPC, excellence in management includes the integrity, responsible and loyal behavior of each collaborator and all our suppliers. Ethical conduct and strict observance of the law favor the creation and maintenance of relationships based on trust, respect and credibility with our counterparts, including suppliers, customers, communities, investors and other groups of interest to the Company.

## II. OBJECTIVE

Through this Code of Conduct for Suppliers (hereinafter and indistinctly "the Code") and as a complement to the provisions of the respective contracts and agreements in force, CMPC establishes the guidelines that must guide the conduct and actions of its suppliers, the 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 their size, country and subsidiary of the CMPC group with which they are related, without prejudice to the corresponding local contractual, legal and regulatory requirements.

CMPC collaborators, for their part, must comply with and ensure full observance of the provisions of this Code in all areas of the relationship with our suppliers.

## IV. GENERAL PRINCIPLES

### a. Law Enforcement

Suppliers must strictly comply with all laws and regulations in force in the countries where they carry out their business and/or operations, including those of a labor, environmental and tax nature, among others. In the same way, they must collaborate in a timely, proactive and transparent manner with local authorities.

### b. Ethical Remuneration

The Company requires that its suppliers pay their workers who provide services to the Company at least the amount that CMPC has established as the common basic income for its operations or tasks, and must make all reasonable and possible efforts to ensure that the employees who provide services services to CMPC receive a remuneration higher than said amount

### c. Respect for Human Rights

Suppliers will conduct their business with full respect and protection of the fundamental human rights of people (internationally recognized and proclaimed in the Guiding Principles of the United Nations Organization), allowing them to develop their talents, knowledge and skills without any type of discrimination or unequal treatment on issues: political, gender, religious, ethnic origin, disability, sexual orientation, promoting the principle of equal treatment, as indicated in the Company's Human Rights Policy (available at [www.cm pc.cl](http://www.cm pc.cl)). Additionally, suppliers undertake not to incur in acts that may be classified as abuses of Human Rights and the Right to Equality and Non-Discrimination, either directly or by omission.

Suppliers must respect the right of workers to bargain collectively and to establish, without prior authorization, the trade union organizations that they deem convenient, in whose constitution and operation the applicable legal norms will be fully respected. Likewise, suppliers must reject child labor and all forms of forced labor.

#### **d. Health and security**

Suppliers must communicate and train their workers about the elements, products and substances that must be used in production processes or at work, as well as regarding the identification and handling of dangerous elements and products, the permissible exposure limits for the same, the dangers to health, and, very especially, on the control and prevention measures that must be adopted to mitigate such risks and thereby avoid any damage to health and safety.

At CMPC, no work will be performed without fully respecting the value of safety, which is why all suppliers must adhere to current values, regulations and critical health and safety procedures.

#### **e. Environmental care**

Suppliers must protect with the utmost diligence and take care of the environment in the places where they carry out their business and operations. They also undertake to apply the so-called "Precautionary Principle" in any situation where the possible environmental impacts of their actions are unknown, as established in the document "Minimum Transversal Standards for Suppliers of Goods and Services" or another that replaces it.

Suppliers must comply with all the environmental standards that CMPC has signed, through its commitments and the different international certifications to which it adheres.

Suppliers must avoid all kinds of environmental damage and, in the event of any event of this nature, whether or not related to the services and/or products they provide, they must notify the Company immediately and execute all mitigation measures. to reduce impacts.

Suppliers must promote the 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 Integrity – Probity Policy (available at [www.cmipc.cl](http://www.cmipc.cl)) which establishes the minimum standards of behavior that the Company expects and requires from its employees, suppliers and other counterparties to face the potential risks of corruption to employees that the development and operation of their businesses may be exposed. In this sense, CMPC expressly, absolutely and strictly rejects and prohibits all forms of corruption, bribery and other conduct contrary to the principles and values of the Company.

Suppliers must conduct their business 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 seek to obtain undue advantages or preferential treatment.

### b. Free Competition

CMPC has an Integrity Policy - Free Competition (available at [www.cmipc.cl](http://www.cmipc.cl)), which establishes the minimum standards of behavior that the Company expects and requires from its employees, suppliers and other counterparties to prevent the commission of anticompetitive conduct in the different markets in which it participates. In this sense, CMPC expressly, absolutely and strictly rejects and prohibits any act or conduct contrary to the laws and regulations that regulate and protect free competition.

Suppliers must conduct their business autonomously and independently, with full respect for the laws and regulations that regulate and protect free competition, adopting their decisions based on general, objective and uniform criteria.

### c. Crime prevention model (applicable to Chilean subsidiaries)

Consistent with the provisions of Law No. 20.393 and in the exercise and fulfillment of its management and supervision duties, CMPC has designed, adopted and implemented a Crime Prevention Model (available at [www.cmipc.cl](http://www.cmipc.cl)) whose purpose is to prevent the commission of the crimes indicated in the aforementioned law.

Suppliers must comply with the CMPC Crime Prevention Model, in addition to adopting and implementing a model in the terms defined by Law No. 20.393 or, failing that, implement internal control and oversight mechanisms necessary to prevent the commission of the aforementioned crimes.

**d. Conflict of interests**

Acting guided by an interest other than that of the Company, whether one's own or that of a third party, could seriously affect CMPC's assets, reputation and business objectives. In the event that the supplier identifies a situation of conflict of interest with directors, executives and/or collaborators of CMPC, whether real, potential or apparent, it must immediately, expressly and formally declare it to the Company prior to any action and refrain from to participate in decision-making on matters affected by the conflict and/or exert influence over the people in charge of making them.

**e. Economic sanctions**

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

**f. Data Protection**

CMPC unrestrictedly complies with all applicable laws and regulations that protect and regulate the protection of Personal Data in all jurisdictions where it carries out its operations or maintains business relationships, also including the best international practices in the matter. In this sense, the Company rejects and expressly, absolutely and strictly prohibits any act contrary to said laws, regulations and practices.

The provider undertakes to use the personal information it accesses in accordance with current laws and regulations, in particular Law No. 19,628 on the Protection of Personal Data (subsidiaries in Chile), as well as in consistency with the best international standards and practices in the matter, committing itself to its due care and protection with the greatest diligence, being responsible for indem-

nifying the owners of the respective data for the patrimonial and moral damage caused by the improper treatment of personal data, as defined in said law.

**g. Complaint line**

CMPC has a complaints channel, accessible directly at <https://lineadenuncia.cmpc.cl/> or through the CMPC corporate website. This tool is available to collaborators, suppliers and third parties in general. Reports may be made anonymously (as long as local law allows) and due confidentiality will be maintained during the investigation process.

Suppliers must report through this channel any fact, action, conduct or circumstance that constitutes or may constitute an infraction of this Code and, in general, of the principles and values of CMPC, as well as the laws and regulations in force.

## **VI. CONFIDENTIALITY OF INFORMATION**

The Supplier undertakes to maintain strict confidentiality of the information provided by CMPC, applying the same zeal with which it ensures the confidentiality of its own information, as regulated in detail in the agreements and contracts entered into with the Company.

## **VII. INTELLECTUAL AND INDUSTRIAL PROPERTY. USE OF SYSTEMS**

The supplier will respect the intellectual and industrial property rights of CMPC, forcing itself to immediately report any affectation or risk of infringement of the same. In the event that the supplier has access to CMPC computer systems, they will use them exclusively for the purposes entrusted to them and must safeguard the use of access codes and the intellectual and industrial property rights of third parties.

## VIII. RELATIONSHIP WITH THE COMMUNITY

CMPC makes a serious and proactive effort to approach, work together and open doors with the neighbors and communities with which it relates in the development of its business and operations, with the ultimate goal of generating shared value. In this sense, in the event that the supplier becomes aware of claims, concerns or concerns of communities or neighbors of CMPC, it must immediately and formally report it to the Company, through the complaint line (<https://lineadenuncia.cmpc.cl/>). Likewise, the supplier undertakes to have an attitude of respect towards the community and neighbors, being a real contribution to local communities through actions that benefit or help their direct neighbors, especially considering the good relationship with their stakeholders.

## IX. CODE COMPLIANCE

This Code is understood to be an integral part of the contracts that the Company signs with its suppliers for this purpose. In this sense, the breach of this Code constitutes a serious infraction of said contracts and will give rise to the application of the sanctions and legal actions that these and the applicable local legislation consider.





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