

A. About EthicsPoint

A.1. What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX, which enables management and workers of Codelco the treatment of fraud situations, abuse and other misconduct in the Corporation while developing a positive working environment and a strong culture of probity and transparency.

A.2 Why do we need a system like EthicsPoint?

Our workers (men and women) are our most important asset. By creating open communication channels, we promote a positive and transparent working environment in a culture of integrity and ethical decision-making. We ask you to use this tool in a serious and responsible way and respecting the rights of people. You can use this tool for issues that are infringements, providing clear and comprehensive information to initiate an investigation, if applicable (e.g. the name of people and/or companies involved; how, when and where the possible misconduct happened; the contract or tender number, among others).

A.3 Why should I report what I know? What does it bring me?

We all have the responsibility to maintain the highest ethical standards in Codelco. Furthermore, we have the right to work in a positive environment and make known to the Senior Management if anyone is not acting right. By working together, we can maintain a healthy and productive environment. Furthermore, misconduct can threaten the Codelco's image and the management of the entire company.

A.4 Does the management really need my complaint?

Absolutely, yes. Indeed, we need you to report. You know what happens in Codelco, both good and bad. It is possible that you have initial knowledge of an activity that may be cause for concern. Your complaint can reduce the possible negative impact in Codelco and our staff. In addition, the provision of a positive action can help to identify problems that can improve the Company's culture and performance.

B. Regarding the complaints

B.1 Can I report by Internet or phone?

Yes. EthicsPoint allows you to present a confidential and anonymous complaint by phone or Internet (either by a computer or your Smartphone).

B.2 What kind of situations should I report?

Any breach of our Codelco's Code of Business Conduct, violations of legal regulations, policies, procedures or any other rule applicable to the Corporation, its workers, its relationships with contractors and/or third parties. (Catalog of complaints)

B.3 What information should I include?

It is very important to provide clear and complete information to initiate the relevant investigation of the case. e.g. the name of people and/or companies involved; how, when and where the possible misconduct happened; the contract or tender number, among other specific information that can be provided.

B.4 Can I make an anonymous complaint?

Yes, once you make a complaint, there is the option to remain anonymous. On the other hand, in case you don't identify yourself, the tool allows you to maintain contact to inform about any progress of our investigation and to ask you for information that may be relevant. Please consider that there are some complaints that are not searchable if you don't provide your identity (e.g. labor and sexual harassment).

B.5 How is my identity protected?

The service of receipt and reporting of complaints is presented by the foreign provider Navex (through its EthicsPoint service) on servers in the United States, on a network other than Codelco to which it is not possible to access for information tracking. If you identify yourself, Internal Audit ensures you the reservation of your data until the conclusion of our investigation. There will be exceptions, such as when information is required by the police or courts of justice.

B.6 How can I make sure that there will be no retaliation against me if I make a complaint?

In Codelco, we do not tolerate any kind of retaliation. If you suffer any kind of retaliation, you can report the fact through this channel.

B.7 How do I keep in touch with you?

We will keep constant communication with you. You will be informed about the stages of the review process. You may review this information with your username and password that are granted when you make your complaint. Additionally, you will receive a follow-up message on a monthly basis and we will provide you a brief description of the conclusion of this case at the end. If we have received false or malicious complaints, we could take actions against you.

B.8 What kind of situations should I NOT report?

Our system is designed to report well-founded and irregular facts. If you report any of the following situations, your complaint can be dismissed:

- False, unfounded, malicious complaints or complaints made in bad faith.
- Situations where there are no certainties or real conviction about the facts reported.
- Emergency situations that put at risk people's lives.
- Matters related to the normal process of contract management, outstanding payments to contractor or subcontractor companies and their employees. These matters should be treated through the corresponding process.
- Grievance, claims or questions on the complaint matter.

B.9 Who reviews my complaints?

Internal Audit is an independent area of the Codelco's administration and has been appointed by the Board of Directors as the area with the power to conduct investigations. There are some infringements that will have to be resolved directly by each workplace in accordance with the applicable internal rules.

B.10 What happens with my complaint once entered?

Your complaint will be processed and, if the case requires it, the complaint will be investigated according to the existing rules. During the Internal Audit personal investigation, you may consult through the platform. If 10 working days have passed from the request for additional background and this data has not been provided by the complainant, we will proceed to close the complaint for lack of sufficient background.