



EU WHISTLEBLOWING GUIDELINES

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1. Introduction

SQM Europe NV, SQM Iberian SA, SQM Holland BV and/or SQM Hellas SA (hereafter referred to as “We”, “Us”, “Our”) are a subsidiary of the SQM group of companies, a global organization, headquartered in Chile, that values responsibility, safety, and integrity.

Our Code of Ethics offers general guidelines on how We interact with others and conduct Our business, upholding the highest ethical standards in Our relationships with all individuals and entities.

We are committed to fostering an environment where open and honest communication is the norm. We want you to feel comfortable making good-faith reports through any available channel, confident that your concerns will be heard in confidence and that retaliation is strictly prohibited. Our internal whistleblowing system ensures that whistleblowers can report information confidentially and, if they wish, anonymously.

All whistleblowing reports will be treated seriously, and We assure that your identity will be protected in accordance with the relevant applicable laws and regulations.

Whistleblowing reports are important to Us as they may lead to the effective detection, investigation, and follow-up of abuses and/or violations of the Code of Ethics, internal policies and procedures, and laws and regulations that would otherwise remain hidden. Whistleblowers contribute to the building and securing of the SQM group of companies, limiting any potential damage or losses.

These guidelines provide a framework for anyone who wants to report unethical or illegal behaviour. These guidelines implement the EU Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law and the relevant local implementation thereof in the country where We have our registered address.

2. Scope

This Policy applies to all whistleblowing reports related to Us, and any other European SQM subsidiary.

3. Who is a Whistleblower?

Whistleblowers are natural persons who work for an organization or who have been in contact with an organization during their professional career and who report wrongdoing they may encounter in the course of their work.

4. Types of misconduct that can be reported

All matters constituting misconduct or wrongdoing related to Us may be reported. A non-exhaustive list of matters may be found hereafter:

- a. Public procurement.



- b. Financial services, products, and markets, prevention of money laundering and terrorist financing.
- c. Product safety and product compliance.
- d. Transport safety.
- e. Environmental protection.
- f. Radiation protection and nuclear safety.
- g. Food and feed safety, animal health, and animal welfare.
- h. Public health.
- i. Consumer protection.
- j. Protection of privacy and personal data, and security of network and information systems.
- k. Combating tax fraud.
- l. Combating social fraud.
- m. Unfair treatments, discrimination, harassment, infringements of the Code of Conduct.
- n. Corruption or bribery.
- o. Labor and employment violations.
- p. Internal misconduct and/or ethical violations.

In Italy, external whistleblowing reports may be submitted only in relation to violations of European Union or Italian law, including criminal, civil, administrative, or accounting offences, as well as conduct relevant under Legislative Decree No. 231/2001 or acts that undermine the public interest. Reports concerning personal employment grievances or interpersonal conflicts are excluded, unless they also constitute a reportable legal violation. Reports should be based on facts or reasonable suspicions acquired in a work-related context and fall within the competence of the National Anti-Corruption Authority (ANAC).

5. How to report?

A Whistleblower may report internally or externally. We strongly encourage you to first report internally, allowing Us to take corrective measures as quickly as possible.

a. Internally:

- a. We are using the NAVEX platform, which is an IT tool hosted through an external subcontractor. Such platform may be accessed through the following link: <https://secure.ethicspoint.com/domain/media/en/gui/55494/index.html>



- b. You may also send Us a letter, as applicable, addressed to:
 - i. Head of Legal, SQM Europe NV, Houtdok – Noordkaai 25a, 2030 Antwerpen, Belgium (clearly mention “CONFIDENTIAL” on the envelope).
 - ii. Head of Legal, SQM Iberian SA, Calle Provenca 249-251 Barcelona, 08008 Spain (clearly mention “CONFIDENTIAL” on the envelope).
 - iii. Head of Legal, SQM Holland BV, Autrichehavenweg 10, 4554 MB Westdorpe, the Netherlands (clearly mention “CONFIDENTIAL” on the envelope).
 - iv. Head of Legal, SQM Hellas SA, 16, Kifissias Avenue, 11526, Athens, Greece (clearly mention “CONFIDENTIAL” on the envelope).
 - v. Head of Legal, Italian Branch of SQM Europe NV, Via A. Meucci, 5, 50012 Grassina FI, Italy (clearly mention “CONFIDENTIAL” on the envelope).
- c. You may request an in-person meeting with the Head of Legal (by e-mail – EUwhistleblowing@sqm.com).

b. Externally.

- a. Depending on the country, reports may also be submitted to competent national authorities designated under local whistleblowing legislation, as included in Annex 1.

6. Follow-up on a report

If you made yourself known in your report, you will receive an acknowledgement of receipt within seven (7) calendar days.

Within a reasonable timeframe, not exceeding three (3) months from the acknowledgement of receipt, the designated person will provide feedback to the Whistleblower.

7. Data Privacy

Whistleblowers’ private data will be handled in the Whistleblowing Data Privacy Policy.

Annex 1

National Competent Authorities

1. Belgium

The Belgian government has designated an external reporting channel. This is the Integrity Center of the Federal Ombudsman, which you can contact as follows for complaints related to SQM Europe NV:

- Online: <https://www.federaalombudsman.be/nl/klokkenluiders/>
- Telephone: 0800 99 961 (Belgium) or +32 2 289 27 27 (Abroad)
- E-mail: integriteit@federaalombudsman.be

2. Spain

The Spanish government has designated an external reporting channel. This is the Autoridad Independiente de Protección del Informante, which you can contact as follows for complaints related to SQM Iberian SA:

- By mail: Calle Luis Cabrera 9, planta 4, 28002 Madrid, Spain
- E-mail: canal.externo@proteccioninformante.es

3. Holland

The Dutch government has designated an external reporting channel. This is the “Huis voor Klokkenluiders”, which you can contact as follows for complaints related to SQM Holland BV:

- By mail: Huis voor Klokkenluiders, Postbus 85860, 2508 CJ Den Haag, the Netherlands
- By phone: 088 – 133 10 00
- E-mail: contact@huisvoorklokkenluiders.nl
- Online: https://mijn.portaal-huisvoorklokkenluiders.nl/zaak/create/webformulier?zaaktype_id=146&aanvrager=betrokене-natuurlijk_persoon-8505&ztc_aanvrager_type=unknown&sessreset=1



4. Greece

The Greek government has designated an external reporting channel. This is the “Εθνική Αρχή Διαφάνειας (the National Transparency Agency)”, which you can contact as follows for complaints related to SQM Hellas SA:

- By mail: 195 Lenorman av. & Amfiaraou str., P.C. 104 42, Athens, Greece (in a sealed envelope marked “Whistleblowing”)
- By phone: +30 213 212 9870
- E-mail: kataggelies@aead.gr
- Online: <https://extwhistle.aead.gr>

5. Italy

The Italian government has designated an external reporting channel. This is the “National Anti-Corruption Authority”, which you can contact as follows for complaints related to the Italian Branch of SQM Europe NV:

- Online: <https://whistleblowing.anticorruzione.it/#/>
- Phone: +39 06 62289571
- Certified email (PEC): protocollo@pec.anticorruzione.it
- Email for whistleblowing office: ufficio.uwhib@anticorruzione.it