

\*\*\*\*\*FREE TRANSLATION\*\*\*\*\*

## **Corporate Donations Policy**

### **I. OBJECTIVE**

To define the guidelines and criteria established by the Board of Directors of SMU S.A. in order to make donations to third parties, ensuring that such donations meet the requirements in force, in accordance with both internal and external regulations.

### **II. SCOPE**

SMU's Corporate Donations Policy (herein, the "Policy") applies to SMU S.A. and its subsidiaries in Chile (herein, "SMU" or the "Company").

### **III. STANDARDS AND REGULATIONS**

- Law No. 19,885 that incentivizes and regulates the proper use of donations that give rise to tax benefits (and any subsequent modifications to such law).
- Law 20,393 that establishes criminal liability for corporations in the crimes of money laundering, financing of terrorism, bribery, receiving stolen goods, and others.
- Crime Prevention Manual.

### **IV. GENERAL CONSIDERATIONS**

The Donations Committee shall be responsible for the approval, in whole or in part, or rejection of donations requested from or offered to SMU. The Donations Committee shall operate in accordance with its by-laws and decisions with respect to donations shall be made on the basis of the information, justification and supporting materials provided by the respective institutions, individuals, executives or directors requesting such donations.

### **V. POLICY**

#### **1. BENEFICIARIES**

##### **1.1. Profile of Beneficiaries**



Donations to third parties may be received by public or private legal entities or individual persons who are not government employees. Groups or organizations of government employees are also not eligible to receive donations. Private legal entities may be for-profit or not-for-profit.

Donations must only benefit persons or entities that have been duly accredited by the competent authorities or organizations, whose prestige and morality are renowned, and that have the appropriate organizational structure in order to properly and legally administer the resources. In this sense, it is extremely important to take into consideration the beneficiary's image and reputation, as well as the management capabilities it has demonstrated with the resources available to it in order to achieve its objectives.

SMU S.A.'s Directors' Committee may request detailed reports on how the beneficiary uses its resources, both before and after the donation has been made.

### 1.2. Donations to Individuals

Donations to individuals are only permitted in the event that SMU makes a donation to its employees, when they or their families have been affected by serious and unforeseen circumstances that have been duly verified by the corresponding member of Management. Any exceptions to this point must be expressly approved by the Donations Committee.

### 1.3. Donations to Public Services or Institutions

In the case of donations to public services or institutions, it is of utmost importance to thoroughly analyze that such donation will not affect the necessary impartiality required of the beneficiary service or institution. In no case may a donation be made if, from the information and/or documentation accompanying the request, it can be deduced that the intention of such donation is to benefit government employees or their interests. Therefore, the representative of the institution must provide a sworn statement attesting to the absence of conflicts of interest including those related to government employees who may use their office to act or fail to act in benefit of SMU.

## 2. CONDITIONS REQUIRED FOR DONATION

### 2.1. Approval of a Donation

Prior to any donation of funds or goods belonging to SMU or its subsidiaries for charitable purposes, the operation must be approved by the Donations Committee and, if the amount exceeds UF 1,000, it must also be approved by the Directors'

Committee and the Board of Directors. Such approvals are required for all charitable giving by the Company. Sponsorship contracts in which the Company receives advertising in exchange for such sponsorship are expressly excluded from this Policy, as such contracts are subject to the requirements of the Sponsorship Contracting Procedure, for which the Marketing department is responsible.

Donations that are approved must meet all applicable legal requirements, including civil, tax, and other regulations in accordance with the special donations statute that applies depending on the nature of the donation or the identify of its recipient. Likewise, all efforts must be made to obtain the donation certificates and any other applicable formality required by the legal framework to which the respective donation is subject and which, in turn, make it possible to obtain any tax benefits provided for in the applicable standards and regulations.

## 2.2. Purpose of Donations

All donations made by SMU, whether in money or in kind, must be aligned with the focus areas of the Sustainability Program developed by the Corporate Affairs department. These focus areas are:

- a) The development of small and medium enterprises (SMEs or *PYMEs* in Spanish).
- b) The support of institutions in the areas of cognitive and physical disabilities.

## 3. REQUESTS AND AMOUNTS

### 3.1. Donation Requests

All donation requests, regardless of amount or quantity, must be requested in a timely manner through the Corporate Social Responsibility and Inclusive Business department for analysis and subsequent presentation to the Donations Committee.

Such department shall present the request to the Donations Committee and then provide a response to the person or entity requesting the donation.

Donations may only be expressly requested by the persons holding the following positions:

- Director of SMU
- Chief Executive Officer
- Senior management team members reporting directly to Chief Executive Officer
- Heads of Formats
- Regional, Zone, and Market Managers



### 3.2. Donation Amounts

The amount of the donation requested must be reasonable and appropriate, considering the nature of the donation and the circumstances in which it is granted.

SMU's counterpart in any discussions relating to donations shall be the direct representative of the beneficiary, and any amounts granted will be made payable exclusively to the beneficiary person or entity.

## 4. PARTICIPATION OF OUR EMPLOYEES

Any employees that participate in the coordination and process of approving donations or any activities necessary to carry out the granting of such donations must, at all times, strictly adhere to SMU's internal regulations establishing best practices in integrity, ethics and transparency, especially with respect to Law 20,393 that establishes criminal liability for corporations in the crimes of money laundering, financing of terrorism, bribery, receiving stolen goods, and any others that may be added to such law in the future.

Similarly, employees must always adhere to the provisions of SMU's Code of Ethics, Internal Rules of Order, Hygiene, and Safety, and the Company's Crime Prevention Model.

Employees who are aware of the granting of donations by SMU are required to report any behavior on the part of the beneficiary, customers, suppliers, or third parties that could constitute crimes or violations under Law No. 20,393, other laws in force, internal standards, or that otherwise contravene SMU's values and principles. Any such report should be filed through the Whistleblower Channel or formally with the Donations Committee.

Any employee who proposes a donation that could directly or indirectly incite or constitute bribery, corruption, malfeasance, misleading or false advertising, or any other behavior that contravenes SMU's ethics and values as well as laws in force shall be deemed to have committed a serious infraction of SMU's Code of Ethics and Internal Regulations.

## **VI. DISCLOSURE, EFFECTIVE DATE, AND APPLICATION**

This Policy shall be presumed to be known upon publication on the intranet, and it will be in force indefinitely. The same rule shall apply in the event of any modifications to such Policy.

Compliance with this Policy is mandatory for all of SMU's employees in Chile.