

ANTI-CORRUPTION AND FREE COMPETITION POLICY TOPTAINER COMPANY

(In accordance with CMF NCG 461)

Company: TOPTAINER

Tax ID: 76.105.422-8

Scope: Multimodal logistics (truck–port–ship–warehouse–last mile) in Patagonia and the rest of Chile

Effective Date: [October 1, 2025]

Version: 1_0

Approval: Board of Directors [September 29, 2025]

1. PURPOSE

The purpose of this policy is to establish a regulatory and practical framework that ensures that all operations of TOPTAINER, dedicated to providing logistics services to the salmon and retail industries in Patagonia, are carried out in strict compliance with free competition regulations and the best practices of corporate governance and sustainability required by NCG 461. 461 of the CMF.

2. GUIDING PRINCIPLES

Legality: Strict compliance with the Law for the Defense of Free Competition (DL 211) and other applicable regulations.

Integrity: Zero tolerance for collusive agreements, abuse of dominant position, or other anti-competitive conduct.

Transparency: Objective and verifiable contracting, negotiation, and pricing processes.

Equity: Fair and non-discriminatory treatment of clients, suppliers, and competitors.

Sustainability: Incorporating free competition as part of the ESG commitment, avoiding practices that harm communities or the Patagonian environment.

3. SCOPE

This policy applies to:

- Board of Directors and Senior Management.
- All TOPTAINER employees.
- Contractors, subcontractors, strategic suppliers, and business partners.

4. ASSOCIATED RISKS (NCG 461)

In accordance with corporate risk management, the main free competition risks are identified:

- **Technical:** Improper exchange of sensitive information regarding routes, transport frequencies, or fleet capacity.
- **Economic:** Price or tariff coordination with competitors.

- **Legal:** Fines from the National Economic Prosecutor's Office (FNE) and lawsuits for damages.
- **Environmental and Social:** Negative impacts on local communities due to abusive practices in a limited market.
- **Reputational:** Loss of trust from customers, suppliers, and stakeholders due to regulatory non-compliance.

5. GUIDELINES FOR CONDUCT

- Coordinating prices, market share, or customers with competitors is prohibited.
- Any practice of rigged bids or exclusion agreements is prohibited.
- The relationship with suppliers must be based on objective technical and economic criteria, avoiding favoritism or arbitrary discrimination.
- In trade associations or salmon clusters, participation must be limited to technical, regulatory, and sustainability purposes, excluding sensitive commercial issues.
- The use of privileged information to obtain undue competitive advantages is prohibited.

6. GOVERNANCE AND RESPONSIBILITIES

Board of Directors: Approves this policy and oversees its compliance as part of the corporate governance system.

General Management: Leads the implementation and oversight of the policy.

Compliance Officer: Responsible for monitoring risks, the whistleblowing channel, and audits.

Employees and Suppliers: They must respect this policy in all operations.

7. COMPLIANCE AND CONTROL MECHANISMS (ALIGNED WITH NCG 461)

- Periodic training on free competition and associated risks.
- Confidential and anonymous reporting channel, accessible to employees, suppliers, and customers.
- Contract review: include free competition clauses in contracts with suppliers and customers.
- Internal and external audits to verify compliance.

- ESG Reports: integrate compliance metrics into the Integrated Report and reports to the CMF.

8. CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with this policy will be considered a serious offense and may result in:

- Internal disciplinary sanctions.
- Termination of contracts with suppliers or partners.
- Complaints filed with the National Economic Prosecutor's Office or other regulatory bodies, as applicable.

9. REVIEW AND UPDATING

This policy will be reviewed at least every two years, or sooner if there are significant changes in competition law or in CMF General Rule 461.

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