

CODE OF ETHICS AND CONDUCT FOR TOPTAINER

1. MESSAGE FROM THE BOARD OF DIRECTORS

At TOPTAINER, we understand that trust, responsibility, and integrity are fundamental pillars for our success and sustainable growth. This Code of Ethics and Conduct reflects our unwavering commitment to responsible business practices and the values that define us.

We invite every member of the organization to adopt this Code as an essential guide in their daily actions, strengthening our culture based on transparency and honesty.

We are convinced that by living these values, we will continue to build a company that inspires trust and pride in our logistics family, customers, suppliers, and communities.

2. INTRODUCTION AND SCOPE

The purpose of this Code is to establish the criteria, standards, guidelines, rules of conduct, and responsibilities that all members of TOPTAINER must observe. This includes directors, managers, executives, and all TOPTAINER staff, as well as employees of contracting companies, suppliers, advisors, and consultants, or any person acting on behalf of the company, regardless of their rank, function, or location.

This document complements internal policies, regulations, and procedures, and its contents should continuously inspire the company's culture, goals, decisions, and ways of working. It aims to ensure that everyone has a clear understanding of the expected behavior and can act appropriately, even in complex situations.

3. OUR CORE VALUES AND ETHICAL PRINCIPLES

Our culture is based on values that foster consistency in all our actions with members of the organization, clients, suppliers, communities, and various stakeholders. Our values are:

- Passion for our work, operational and documentation excellence, always putting the client at the center.
- Integrity, honesty, probity, and a clear ethical sense.
- Safety, responsibility, and discipline, with an unwavering priority on protecting life, equipment, facilities, and the environment in every action.
- A spirit of camaraderie and teamwork, promoting mutual respect and collaboration.
- Simplicity, austerity, and an entrepreneurial spirit.
- Leadership by example, fostering a strong corporate culture that respects diversity, promotes inclusion, and ensures a positive and constructive work environment.
- Sustainability with CO₂-optimized routes; waste management; local community relations.

4. INTEGRITY IN OUR OPERATIONS AND WITH THIRD PARTIES

To guarantee an exemplary corporate governance framework and effective risk management, the following rules govern our actions:

- **Conflicts of Interest**

Every director, manager, executive, and employee must be vigilant and avoid situations that could compromise trust or create conflicts between their personal interests and those of the Company. It is prohibited to carry out transactions, negotiations, or personal involvement that interfere or could interfere with the interests of the organization, including those with competitors, contractors, suppliers, or clients. Any conflicts, real or potential, must be reported immediately to direct supervisors.

- **Proper Use of Internal Resources**

Directors, managers, executives, and employees have a duty to protect and optimize the Company's assets, such as infrastructure, vehicles, furniture, and technology, promoting their efficient use and seeking savings. The misuse or use of Company assets and resources for personal purposes is prohibited. Computer programs and electronic files must be protected to prevent damage, data loss, or contamination.

- **Information Security and Confidentiality**

All information concerning the Company that is not publicly available is a valuable asset. The Company has implemented a robust system to guarantee the confidentiality, integrity, and availability of our information. Employees must maintain strict confidentiality regarding privileged or confidential information and not disclose it for their own benefit or that of third parties.

- **Prevention of Crime, Fraud, and Corruption**

Our Company opposes all forms of corruption and does not tolerate obtaining advantages through improper means. It is expressly prohibited to engage in any act that could lead to the organization being charged with crimes such as money laundering, terrorist financing, receiving stolen goods, bribery, corruption, conflict of interest, fraud, robbery, or theft. We strictly comply with the stipulations contained in the crime prevention manuals of Laws No. 20,393 and No. 21,595, and we have an implemented model to prevent these crimes.

- **Free Competition**

We require ethical and diligent behavior from everyone in complying with the General Free Competition Policy. Coordinating with competitors to fix prices, artificially limit the supply of services, allocate market areas or quotas, or influence bidding processes is prohibited. Disseminating sensitive commercial information or abusing a potentially dominant market position is also prohibited. We have procedures in place to prevent and detect regulatory non-compliance that could affect free competition.

- **Relationships with Third Parties (Clients, Suppliers, and Authorities)**

We maintain fair business practices with clients, suppliers, and competitors, basing our decisions on general market conditions and respecting current regulations, free competition, truthfulness, and transparency. We have procedures in place to prevent and detect regulatory non-compliance related to our clients' rights.

- **Gifts and Courtesies**

Offering or accepting gifts, commissions, prizes, trips, or any other type of gift that could constitute or be interpreted as an incentive for decision-making, affect reputation, or violate regulations is prohibited. Gifts or courtesies of mutual courtesy are permitted, provided their value does not exceed 1 UF (Unidad de Fomento, a Chilean unit of account). Gifts of greater value must be communicated to and approved by general management or supervisors and intended for return, donation, or raffle among employees. Gifts of significant value will not be accepted or given to employees or public officials seeking to influence them. Any facilitation payments or contributions to political activities are prohibited.

- **Alcohol and Drugs**

Reporting to work under the influence of alcohol or drugs is strictly prohibited. The possession, distribution, sale, and consumption of illicit drugs are also prohibited. Alcohol is prohibited on company premises, except at institutional events with moderate and responsible consumption.

- **Personal Finances and Investments and Personal Conduct**

Personal investments or business transactions with the Company or immediate family members are prohibited without prior authorization from management, to prevent the use of privileged information or conflicts of interest. Personal or business activities may not be conducted during working hours or using company resources. Personal conduct, both during and outside of working hours, must always be appropriate and must not affect the company's image or interfere with work responsibilities. -Supplier and Subcontractor Management

We have a policy in place to establish guidelines for selecting subcontractors, requiring labor standards and verifying their compliance. Our supplier payment policy promotes timely payments and distinguishes between critical and non-critical suppliers. We have procedures in place to evaluate suppliers, including their corporate governance, risk management, and sustainability aspects.

- **Risk Management**

The Company integrates a risk management and internal control framework into its activities.

We have general guidelines on risk management policies for operational, financial, labor, environmental (including climate change), social, and human rights risks.

We identify material risks and opportunities that may affect our performance and financial condition, including information security and customer data privacy risks.

5. COMPLIANCE MECHANISMS

To ensure the effective application of this Code, the Company has established the following mechanisms:

- **How to Act in Case of Doubts or Violations?**

When faced with a situation or decision, it is suggested to ask yourself:

- Is it right for me and for TOPTAINER?
- Is it consistent with TOPTAINER's values and my own?
- Is it legal? Is it ethical?
- Is it something I want to be responsible for?
- Is it something I would feel comfortable discussing with my family? If doubts persist, you should consult your direct supervisor or the general management. If you become aware of or detect any actions contrary to this Code, you must report them immediately.

- **Whistleblowing Channel**

The Company has a Whistleblowing Channel that guarantees complete confidentiality of the whistleblower's identity, if requested, and appropriate handling of complaints made in good faith. When a complaint is filed, a code will be generated for tracking purposes. This channel is managed by the Chairman of the Board or their designee.

- **Whistleblowing Procedure**

- **Receipt:** Complaints should preferably be submitted in writing or through a digital channel.
- **Processing:** The complaint will be acknowledged within 2 business days, and each complaint will be investigated expeditiously and impartially within a maximum of 30 calendar days. The innocence of all persons under investigation will be presumed, and they will have the right to present their defense.
- **Resolution:** Complaints will be reviewed by the Ethics and Compliance Committee, which will determine the appropriate resolutions.
- **File:** A confidential record will be maintained of all complaints, documents, and background information collected, safeguarding the identity of the complainants. Submitting information negligently or in bad faith is considered a serious offense.

- **Ethics and Compliance Committee**

An Ethics and Compliance Committee (or Audit and Compliance Committee) will be responsible for ensuring the updating, dissemination, and compliance with this Code. Its functions include promoting values and conduct, acting as an advisory and supervisory body, resolving conflicts, and applying disciplinary measures.

- **Sanctions**

Failure to comply with this Code or related policies will result in the application of corrective and disciplinary measures, which may include verbal or written warnings, ethics training, fines (up to twenty-five percent of daily wages, according to labor law), and other sanctions provided for in current legislation, depending on the severity of the infraction. There will be no reprisals against those who, in good faith, report misconduct or breaches.

6. EFFECTIVENESS AND AMENDMENTS

This Code of Ethics and Conduct will become effective upon its official publication and will be disseminated to all employees and stakeholders. Any amendments to this Code must be approved in advance by the Company's Board of Directors.