PUBLIC OFFICIALS RELATIONS POLICY

MARIMACA

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1. PURPOSE

The purpose of the Public Officials Relations Policy (the "**Policy**") is to regulate, in accordance with Law No. 20,393 on the Criminal Liability of Legal Entities (the "**Corporate Criminal Liability Law**") and Law No. 21,595 on Economic Crimes and Offences against the Environment (the "**Economic Crimes Law**"), the principles that must guide Marimaca in its interactions and relationships with Public Officials, as well as the procedure to be followed in such cases. In addition, Marimaca's Code of Business Conduct and Ethics contains strict requirements for relating to and interacting with such officials or authorities.

2. SCOPE AND APPLICABLE REGULATORY FRAMEWORK

This document applies to all Marimaca Team Members and Suppliers, as well as to any third party acting on behalf of or for the account of Marimaca (such as agents, consultants and lobbyists), to the extent that their interaction with a Public Official relates to Marimaca's interests.

This Policy takes into account the domestic and international regulatory framework applicable to Marimaca in carrying out its activities in Chile, which notably includes the following rules:

- Chilean Criminal Code.
- Law No. 20,393, establishing the criminal liability of legal entities.
- Law No. 21,595 on Economic Crimes, which introduces various innovations in the socio-economic order.
- The United States Foreign Corrupt Practices Act ("***Foreign Corrupt Practices Act***" or "**FCPA**").
- Canada's Corruption of Foreign Public Officials Act ("***Corruption of Foreign Public Officials Act***").
- Australia's Criminal Code (***Criminal Code Act*, 1995**).
- The United Kingdom Bribery Act ("***UK Bribery Act*, *2010***").

In the event of a conflict between this Policy and a regulation applicable to Marimaca that establishes more demanding standards, the stricter standard will prevail, and the Crime Prevention Officer (CPO) must update this Policy within a maximum of 30 calendar days after becoming aware of the need for the adjustment, and must in any event review this Policy at least annually. This Policy, and any amendment to it, must be approved by the Audit and Risk Management Committee, which will report on it to the Board of Directors of Marimaca Copper Corp. References to foreign laws are to be understood as standards of integrity and will be mandatory where they apply to Marimaca by reason of its corporate status, its status as an issuer or the activities it carries out.

3. DEFINITIONS

- **Team Member**: Means any and every person bound to Marimaca by an employment contract; any natural person who, under any contractual arrangement, acts or may act on behalf of or in representation of Marimaca, or who manages its affairs before third parties, public bodies or commercial counterparties, regardless of whether they hold formal powers of representation; and all members of, and advisors to, the Board of Directors.

- **Conflict of Interest**: Means the existence of a clash or conflict between the personal interest of the Team Member and the interest of Marimaca.

- **Corruption**: Means the abuse of entrusted power for private gain, which may include both economic and non-economic advantages. It is a broad concept that encompasses illegal and unethical acts such as bribery, nepotism or the misuse of resources (misappropriation), and it may occur in both the public and private spheres. One of the most significant forms of corruption is bribery, which consists of giving, offering, promising or accepting an undue benefit in connection with a Public Official, whether (i) by reason of their position, even without expecting anything in return at that time (without consideration); (ii) for them to perform or refrain from performing an act within the scope of their duties; or (iii) for them to act in breach of their duties. In this regard, bribery may occur both where there is direct consideration (for example, paying to expedite a permit) and where there is none (for example, giving a gift solely because the person holds public office), and in both cases it may constitute a criminal offence under the Chilean Criminal Code.

- **CPO**: Means the Crime Prevention Officer who, in accordance with Law No. 20,393, is responsible for managing, supervising and keeping up to date Marimaca's Crime Prevention Model in its entirety.

- **Public Official**: The definition of Public Official includes both domestic and foreign officials, as set out in the Chilean Criminal Code. A Domestic Public Official is any person who holds a public office or function in the Central Administration, in semi-public, municipal or autonomous institutions or companies, or in bodies created by or dependent on the State, even if they have not been appointed by the President of the Republic and do not receive a salary from the State, and also includes those holding elected office. A Foreign Public Official is any person holding a legislative, administrative or judicial office in a foreign country, whether appointed or elected, as well as those performing public functions in state agencies or public enterprises of another country. Any official or agent of a public international organization is also considered a foreign public official. For the purposes of this Policy, Public Officials include directors, officers and employees of state-owned or state-controlled enterprises in Chile or abroad (such as Codelco, ENAMI or state-owned companies), and officials of political parties and candidates for public office are also treated as Public Officials.

  Examples of Public Officials relevant to Marimaca's context:

  - An official of the National Geology and Mining Service ("**SERNAGEOMIN**") who carries out inspections at the site facilities.
  - The Regional Ministerial Secretary (Seremi) of Mining for the Antofagasta Region, who may participate in permit assessment processes or inspections.
  - An official of the General Water Directorate ("**DGA**") in charge of processing applications for water rights.
  - A mayor or municipal councillor of a municipality where activities are carried out (such as Mejillones), whose opinion or decision may influence community or regulatory matters.
  - The regional director of the Environmental Assessment Service ("**SEA**"), in the context of an environmental impact assessment.

- **Management of Private Interests**: Any unpaid action or activity carried out by natural persons or legal entities, whether Chilean or foreign, whose purpose is to promote, defend or represent any private interest in order to influence the decisions that, in the exercise of their functions, the passive subjects under the law must make with respect to the acts and decisions regulated therein.

- **Marimaca**: Means: (i) Marimaca Copper Corp.; and (ii) any other legal entity, in any jurisdiction, in which Marimaca Copper Corp. controls, directly or through another natural person or legal entity, more than 50% of its voting capital, or of its capital if it is not a corporation, or is able to elect or appoint, or cause the election or appointment of, a majority of its directors, board members or managers.

- **Lobbying**: Any paid action or activity carried out by natural persons or legal entities, whether Chilean or foreign, whose purpose is to promote, defend or represent any private interest in order to influence the decisions that, in the exercise of their functions, the passive subjects under the law must make with respect to the acts and decisions regulated therein.

- **Relative**: Means a spouse or civil union partner; relatives of any degree in the direct line by consanguinity (father, mother, grandparents, great-grandparents, children, grandchildren, great-grandchildren, etc.) or by affinity (parents-in-law, sons-in-law, daughters-in-law, etc.), whether one's own or those of one's spouse or civil union partner; and relatives up to and including the third degree in the collateral line, whether by consanguinity or affinity (siblings, aunts and uncles, nieces and nephews, whether one's own or those of one's spouse or civil union partner).

- **Politically Exposed Person (PEP)**: Chilean or foreign nationals who hold or have held prominent public functions in a country, until at least one year after they have ceased to perform them. This category includes heads of state or government, senior politicians (including members of the executive boards of political parties), senior government, judicial or military officials, senior executives of state-owned companies, as well as their spouses, their Relatives up to the second degree of consanguinity and the natural persons with whom they have entered into a joint action agreement giving them sufficient voting power to influence companies incorporated in Chile.

  In Chile, at least the following persons are considered PEPs, without this list being exhaustive: (i) the President of the Republic; (ii) Senators, Deputies, Mayors, Municipal Councillors, Municipal Administrators and Municipal Directors of Public Works; (iii) Justices of the Supreme Court, Justices of the Courts of Appeals and first-instance judges; (iv) Ministers of State, Undersecretaries, Regional Governors, Presidential Delegates, Regional Councillors, Regional Ministerial Secretaries and Advisors, Ambassadors, Consuls, and Heads of both centralized and decentralized public services, as well as the immediate senior officer who must deputize for each of them; (v) the Commanders-in-Chief of the Armed Forces, the Director General of the Carabineros (Chilean National Police), the Director General of the Investigations Police, and their respective high commands; (vi) the National Prosecutor of the Public Prosecutor's Office, Regional Prosecutors and assistant prosecutors; (vii) the National Economic Prosecutor; (viii) the Comptroller General of the Republic and Regional Comptrollers; (ix) Councillors of the State Defence Council; (x) Justices of the Constitutional Court; (xi) Justices of the Competition Tribunal; (xii) regular and alternate members of the Public Procurement Tribunal; (xiii) Councillors of the Senior Public Management Council; (xiv) Directors and principal executives of public companies, as

defined in Law No. 18,045; (xv) Directors of corporations appointed by the State or its agencies; and (xvi) members of the executive boards of political parties.

- **Supplier:** Means any natural person or legal entity that has supplied, supplies, intends to supply or could reasonably foreseeably supply goods and/or services to Marimaca without acting on its behalf or managing its affairs before third parties.

Terms used in this Policy that have not been expressly defined must be interpreted in accordance with the definitions contained in the policies and procedures that make up Marimaca's Crime Prevention System.

4. PRINCIPLES

Every interaction between a Marimaca Team Member or Supplier and a Public Official must comply with the following guiding principles:

4.1 Comply with applicable regulations. All Team Members and Suppliers must comply with all the laws of Canada, Australia and Chile, as well as with all the laws of any other country in which Marimaca does business, with respect to rules on interaction with Public Officials and government entities.

4.2 Every interaction with Public Officials must be conducted with integrity and transparency and in accordance with applicable regulations, both in form and in substance: in form, this means that the interaction must take place at an appropriate place and time and in an appropriate manner (for example, at the office, during working hours and with a formal record); in substance, it means that the topics discussed, requests and agreements must be legitimate and transparent. The objective is that the interaction does not give rise to suspicions of improper conduct or breaches of probity on the part of Marimaca, its Team Members or its Suppliers.

4.3 Team Members and Suppliers must inform Marimaca in a timely manner if they have, or have had during the last calendar year, any significant tie with a Public Official or Politically Exposed Person (PEP), including family relationships, joint business interests, personal advisory services or other interests that may give rise to a Conflict of Interest. This obligation is governed by Marimaca's Conflict of Interest Management Policy and is intended to prevent risks of Corruption or other improper conduct in relations with public authorities. The prior review of the CPO is required before Marimaca hires or engages a current Public Official, a person who has been a Public Official during the last twelve (12) months, or a Relative of a Public Official where that Public Official is or may be involved in decisions or procedures concerning Marimaca.

4.4 Team Members and Suppliers are strictly prohibited from engaging in illegal or ethically questionable conduct, such as offering, promising, giving or agreeing to give any item of value, money, gifts or benefits of any kind (including offers of employment, internships, contracts or other business opportunities, loans or personal favours) to Domestic or Foreign Public Officials, whether directly or indirectly through third parties, or to a Relative of a Public Official or any other person or entity at the request or for the benefit of a Public Official, for the purpose of obtaining undue advantages for Marimaca, or simply by reason of the recipient's status as an official. Such practices are unacceptable and constitute a

serious breach of contractual obligations. Marimaca does not make contributions to political parties or candidates for public office, directly or indirectly, and will not reimburse any personal political contribution; donations, sponsorships and endorsements are governed by Marimaca's Donations, Sponsorships and Endorsements Policy.

Nothing in the foregoing prevents Marimaca from complying with legitimate requests from the authorities. Where regulations require the payment of duties or fees for public services, such payments must be made in accordance with the amount established by the relevant regulation. Paying any additional amount is prohibited, even on the pretext of expediting procedures or decisions.

If a Public Official requests, directly or indirectly, an undue benefit in exchange for performing the duties of their position, the Team Member or Supplier must refuse the demand and immediately report the situation to the CPO or through the reporting channels described in the Whistleblower Policy and Internal Investigation Procedure. No Team Member or Supplier will suffer any penalty or other adverse consequence for refusing to pay a bribe or make a facilitation payment, even if the refusal results in delays or in the loss of business for Marimaca.

If there is any doubt as to whether a person qualifies as a Public Official for legal purposes, the Team Member or Supplier must, as a preventive measure, apply this Policy until the contrary is confirmed. This confirmation may be requested directly from the CPO.

Any question regarding the content, application and scope of this Policy must be raised with the CPO.

5. GENERAL PROHIBITIONS AND PROCEDURE

Team Members and Suppliers are responsible, at all times, for complying with all applicable laws and regulations in the countries, states, provinces, municipalities and localities where Marimaca operates. Ignorance of the applicable regulatory framework will never be a valid excuse to justify a breach.
Failure to comply with applicable laws may have serious consequences for Marimaca, as it may be subject to criminal sanctions, significant fines and disqualifications, as well as damage to its reputation. Not only Marimaca could be affected, but also its individual Team Members or Suppliers, who may be exposed to criminal sanctions such as imprisonment and fines.

Marimaca will not tolerate any breach of this Policy or of applicable regulations, whether by act or omission. In the event of a breach, Team Members will be subject to disciplinary measures, including dismissal for cause, while Suppliers may have their contractual relationship terminated without any right to compensation and be disqualified from participating in future contracting with Marimaca.

All payments, gifts, hospitality, fees and other expenditures involving Public Officials, whether made directly or through third parties, must be authorized in advance in accordance with this Policy and Marimaca's levels of authority, be supported by documentation identifying the recipient, the amount or value, the date and the purpose, and be recorded accurately, completely and in reasonable detail in Marimaca's books and records, in accordance with Section 9 of the Crime Prevention System Manual. Undisclosed or unrecorded ("off-book") funds or accounts, and false, misleading or incomplete entries or

supporting documents, are strictly prohibited. If an authorization is requested by the CPO under this Policy, it will be considered, and if applicable approved, by the Chair of the Audit and Risk Management Committee. Any concern regarding the recording of such expenditures may be reported through the reporting channels described in the Whistleblower Policy and Internal Investigation Procedure, including directly to the Chair of the Audit and Risk Management Committee.

5.1 Prohibition on granting benefits or gifts to Public Officials

In the ordinary course of business, Marimaca's Team Members and Suppliers must not give, offer, promise or agree to give, offer or promise any kind of gift, benefit, incentive or advantage of any nature to Public Officials.

If, for exceptional and duly justified reasons, a Marimaca Team Member or Supplier wishes to offer a gift to a Public Official, regardless of its value, they must first request written authorization from the CPO. The CPO's authorization will be reported to the Chief Financial Officer of Marimaca Copper Corp., consistent with the gift and entertainment approval procedures of the Code of Business Conduct and Ethics. Gifts in cash or cash equivalents (such as gift cards, vouchers, loans or securities) will never be authorized, nor will any gift be authorized for a Public Official who is involved in a pending decision, permit application, inspection or other procedure concerning Marimaca. The following factors will be considered in assessing such authorization:

a. *The value of the gift*. Gifts of nominal value (not exceeding US$50 per gift, or US$100 in aggregate per Public Official in any calendar year, or the equivalent in local currency), such as institutional courtesy items or tokens of appreciation with no significant commercial value, are considered acceptable;
b. *The context in which the gift is given*. For example, gifts offered as part of an open corporate event, such as a welcome bag for all attendees at a conference;
c. The position and degree of influence of the Public Official involved; and
d. The local laws and policies governing the conduct of the Public Official.

5.2 Invitations and hospitality expenses for Public Officials

Before offering any form of hospitality, entertainment, courtesy or invitation to Public Officials (including meals, beverages, transportation, tickets or similar activities), Team Members and Suppliers of Marimaca must request prior written authorization from the CPO.

All expenses must be reasonable and proportionate in the circumstances (not exceeding US$50 (or the equivalent in local currency) per person per occasion, taking into account the frequency of hospitality offered to the same Public Official) and directly linked to a legitimate institutional or business activity. For example, a modest working lunch (such as sandwiches and coffee) may be considered acceptable. A meal at a luxury restaurant or one involving alcohol, on the other hand, will not be acceptable.

Offering hospitality for purposes of personal entertainment, or recreational or leisure activities unrelated to Marimaca's professional activities, is strictly prohibited.

The approval of any invitation or expense must also take into account its consistency with the internal rules of the institution to which the Public Official belongs, local laws and the institutional policies of that body, as well as whether the Public Official is involved in a pending decision, permit application, inspection or other procedure concerning Marimaca, in which case only modest refreshments or meals incidental to a working meeting, site visit or inspection may be approved.

These rules may be waived only in extraordinary circumstances, such as:

a. Invitations extended for a well-founded reason (receiving a foreign authority or a globally prominent figure, a visit to a facility of interest, among others);
b. Invitations to events that are also attended by third parties; or
c. Invitations recorded in the Public Official's public agenda, if they have one.

In any event, the existence of the extraordinary circumstances indicated above will not exempt the Marimaca Team Member or Supplier from the obligation to request prior written authorization from the CPO, as set out above. The CPO will record each request for authorization under Sections 5.1 and 5.2, and the decision taken, in a register of gifts and hospitality offered to Public Officials. Any waiver of this Policy for the benefit of a director or executive officer of Marimaca Copper Corp. may be granted only by the Board of Directors (or a committee of the Board of Directors) and will be disclosed as required by applicable securities laws (including National Instrument 58-101).

5.3 Prohibition on facilitation or expediting payments

Facilitation payments are payments made to Public Officials, usually in cash, in order to expedite, speed up or secure the performance of a procedure, act or process that falls within the scope of that official's authority.

Although some jurisdictions permit such payments, Chile, Australia and Canada expressly prohibit them. Under Canada's Corruption of Foreign Public Officials Act (CFPOA), the Criminal Code of the Republic of Chile and Australia's *Criminal Code Act 1995*, facilitation payments are considered acts of Corruption equivalent to a bribe and may give rise to criminal consequences both for the individuals who make them and for the entities involved.

Marimaca strictly prohibits its Team Members and Suppliers from making any kind of payment to a Public Official — whether in cash or in kind — in order to expedite the performance of an official act. **The only exception is a payment made in response to an imminent threat to the health, safety or liberty of a person where there is no reasonable alternative; threats to Marimaca's commercial or financial interests (such as delays or the loss of a permit or contract) never justify such a payment.** Any such payment must be reported to the CPO immediately after it is made, with details of the amount, the recipient and the circumstances, and must be accurately recorded in Marimaca's books and records.

If a Team Member or Supplier is pressured to make such payments, they must refuse the request and immediately report the incident to the CPO or through the established reporting channels.

6. INTERACTION WITH PUBLIC OFFICIALS

Marimaca recognizes that transparency and integrity are the fundamental pillars for the development of its business and is committed to meeting the highest ethical standards in its conduct, taking particular care in its interactions with Public Officials.

6.1 Interactions and Communications with Public Officials

All interactions with Public Officials must take place through formal channels (for example, official letters, letters, corporate emails, etc.), on working days and during working hours, except where justified by objective circumstances.

The use of informal means of communication (for example, social media, text messages, personal email, etc.) is prohibited, unless special circumstances require the use of such channels, in which case the communication must be reported to the CPO. It is also essential to always remain prudent and alert to any signs that may indicate improper conduct.

In certain cases, the Public Official may propose communicating through informal channels. In such cases, an effort should be made to redirect the conversation to institutional channels, courteously pointing out the need for formality and traceability. If the informal channel cannot be avoided, the interaction must be recorded in a corporate email and reported to the CPO. This measure protects Marimaca from potential misunderstandings or exposure to reputational or legal risks.

6.2 Compliance with the Lobbying Law and Management of Private Interests

Marimaca and its Team Members and Suppliers must strictly comply with Law No. 20,730, which regulates Lobbying and the Management of Private Interests before authorities and Public Officials, and observe the ethical standards of transparency, integrity, truthfulness and professionalism in all their dealings with public bodies. Interactions with public office holders in other jurisdictions must likewise comply with the lobbying, registration and transparency rules applicable in the relevant jurisdiction, and the CPO (with the support of legal counsel, where required) must be consulted before any such activity is undertaken.

Both types of activity are subject to registration and transparency obligations when they involve dealings with public authorities considered passive subjects (e.g., Ministers, Undersecretaries, Regional Ministerial Secretaries (SEREMIs), Regional Directors, Division Heads, among others).

The CPO must be consulted whenever there is doubt as to whether a particular meeting or dealing with a Public Official must be registered as a Lobbying or Management of Private Interests activity. The CPO may issue preventive recommendations, where appropriate.

a. Obligation to Request a Formal Hearing

Every hearing with an authority subject to the Lobbying Law must be requested through the Lobbying Law Platform (www.leylobby.gob.cl), specifying precisely:

- The matter to be discussed, which must be legitimate, concrete and precise.
- The identity of the participants.
- The capacity of the person conducting the dealing (lobbyist or private interest manager).
- The entity or interest represented.

b. Activities Regulated by the Lobbying Law

Pursuant to Article 5 of Law No. 20,730, the law regulates all Lobbying or Management of Private Interests activities aimed at influencing the adoption of decisions or acts by public authorities (passive subjects) in the following matters:

i. The drafting, issuance, amendment, repeal or rejection of administrative acts, bills or laws, and decisions of passive subjects

Example: Asking the Regional Director of SERNAGEOMIN to amend a requirement contained in the resolution approving the Site Closure Plan, on the basis of updated technical information. This dealing seeks to amend an administrative act; therefore, a hearing must be requested under the Lobbying Law.

ii. The drafting, processing, approval, amendment, repeal or rejection of agreements, statements or decisions of the National Congress or its members (including its committees)

Example: A Marimaca representative participating in a hearing before the Senate Mining Committee to present comments on a bill on the environmental liability of extractive companies. Since the aim is to influence decisions of Congress, it must be registered as a lobbying or interest management activity.

iii. The execution, amendment or termination of contracts entered into by passive subjects that are necessary for their operation

Example: A request to the Ministry of Public Works to amend the contractual terms of a collaboration agreement for the use of public roads at mining sites. As this involves a direct contractual relationship with a passive subject, the dealing must be registered as a lobbying activity.

iv. The design, implementation and evaluation of policies, plans or programs carried out by the authority

Example: A meeting with the Ministry of the Environment to present information and suggestions regarding the national policy on the relocation of communities affected by mining projects. Because it influences the design or amendment of a public policy, the dealing is subject to compliance with the Lobbying Law.

c. Activities Not Regulated by the Lobbying Law

Under Article 6 of Law No. 20,730, the following situations (among others) are not considered Lobbying or Management of Private Interests and therefore do not require registration:

- Public meetings or general hearings.
- Participation in administrative procedures governed by special laws (e.g., environmental permitting before the SEA).
- Technical fieldwork or inspections.
- Statements in sanctioning or judicial proceedings.
- Participation in formal public participation mechanisms (such as public consultations or workshops convened by the authority).

6.3 Meetings with Public Officials

Meetings with Public Officials should be scheduled in advance to the extent possible, ensuring that they have a clearly identified content, scope and objectives. However, it is recognized that, owing to the nature of Marimaca's operations and the dynamics of certain institutional processes, meetings or interactions may arise that cannot be formally scheduled in advance. In such cases, the following safeguards must be observed:

Before the meeting	During the meeting	After the meeting
Training: It is recommended that Team Members and Suppliers who participate in meetings with Public Officials have received training on these matters, in accordance with Marimaca's compliance plan. If it has not been possible to receive such training beforehand, the instructions contained in this Policy must be followed, and the CPO should be consulted in case of doubt.	**Joint representation:** If a Public Official with significant decision-making power participates in the meeting — that is, any authority empowered to make decisions, issue resolutions, approve or deny applications, or exert direct influence over the matter discussed — it is recommended that at least two representatives of Marimaca attend, provided that this does not hinder the matter or the meeting is not a spontaneous one.	**Incident reporting**: If an irregular situation occurs during the meeting (for example, an offer, an improper request or inappropriate conduct by the Public Official), the Team Member or Supplier must report the matter confidentially to the CPO or through the reporting channels described in the Whistleblower Policy and Internal Investigation Procedure.
Request: Efforts will be made to ensure that the meeting is formally requested by corporate email, letter or other institutional channel, in accordance with the procedures of the relevant public	**Appropriate venue:** Preference should be given to holding meetings at the offices of the public body or of Marimaca, during working hours. If, for practical reasons, meetings are	**Safekeeping of records**:The CPO will keep a confidential record of incident reports, ensuring their traceability in accordance with the Crime Prevention Model and

body. This obligation will be adapted to the urgency or operational context in which the meeting is arranged.	held elsewhere (such as cafés or hotels), it is recommended that the venue, purpose and participants be recorded and subsequently reported to the CPO.	Marimaca's obligations.
Preliminary record (where feasible): Where time and circumstances permit, it is suggested that the purpose and context of the meeting be recorded, for example, in internal emails, electronic calendars or informal records that would allow the event to be reconstructed if necessary.	**Avoid sensitive situations:** Situations that may be perceived as lacking transparency or justification must be avoided, such as private meetings without a record, meetings at unusual hours or in informal settings, unless they have been called by the authority and there is a reasonable justification.	**Ethical conduct:** At all times, and regardless of the venue or format of the meeting, Team Members and Suppliers must firmly reject any improper offer, clearly and respectfully referring to Marimaca's ethical standards and compliance policies.

6.4 Unannounced Inspections or Audits

Given the high level of sectoral oversight that characterizes the mining industry, Marimaca's facilities — including those in hard-to-reach areas — commonly receive unscheduled visits from public bodies such as SERNAGEOMIN, the SMA, the DGA, the SAG and the Carabineros, among others with jurisdiction over the activity. In such situations, the following practical guidelines are established for Team Members and Suppliers, taking into account the dynamics and complexity of the operations:

a. Professional and Respectful Reception

- Receive inspectors with respect and a cooperative attitude, even under conditions of heavy operational workload.
- Request the inspector's official identification and the reason for the visit.
- Allow unobstructed access to the areas requested, while safeguarding operational safety and the physical integrity of people.
- Immediately notify the shift supervisor or the person in charge of the area being visited, by radio, telephone or in person.

b. Internal Notification

- Once the visit is under way, inform the legal department, briefly indicating:
    - Which body is carrying out the inspection.
    - Which aspects are being reviewed.
    - Whether any significant verbal observations were made.

- This notification may initially be made by email, WhatsApp or other usual means, and should subsequently be formalized.

c. Accompaniment and Traceability

- To the extent conditions permit, a representative of Marimaca or of a contractor must accompany the inspection tour, taking note of the aspects observed or queried.
- It is recommended to request a copy of the inspection record, request or any other document issued by the authority. If a formal copy cannot be obtained, take a photograph or transcribe the relevant information.

d. Rejection of Improper Conduct

- If, during the inspection, any kind of improper request, suggestion of an advantage or pressure is received from the official, the conduct must be rejected respectfully but firmly, referring to Marimaca's ethical standards.
- The matter must be reported without delay to the CPO or through the reporting channels described in the Whistleblower Policy and Internal Investigation Procedure.

e. Recording and Follow-up

- Every inspection — announced or not — must be recorded, and its documentation must be filed by the legal or compliance department or by site management, as applicable.
- If the authority establishes corrective measures, their implementation must be followed up in coordination with the relevant area (operations, environment, legal, etc.)

7. DEALINGS WITH THIRD PARTIES

Anti-corruption regulations prohibit both direct and indirect payments or benefits to Public Officials. Therefore, all persons subject to this Policy — including Team Members and Suppliers — must take the utmost care when dealing with third parties acting on behalf of or for the account of Marimaca.

In particular, before engaging agents, consultants, lobbyists or any third party who may interact with public authorities on behalf of Marimaca, reasonable measures must be taken to:

- Verify that the third party is not owned or controlled by a Public Official, unless this is transparent, duly justified and authorized in accordance with internal procedures.
- Ensure that the agreed payments are reasonable, proportionate and duly justified in relation to the services actually rendered, and that they do not conceal undue benefits to officials.
- Require the third party to formally adhere to this Policy through contractual clauses, including representations and undertakings to comply with applicable anti-corruption laws (including Law No. 20,393), a prohibition on subcontracting or using intermediaries in dealings with Public Officials without Marimaca's prior written consent, periodic certifications of compliance, Marimaca's right to suspend payments and to terminate the contract in the event of a breach, and

an undertaking to cooperate in internal audits of the payments made and actions taken under its contract.

- Identify and resolve, before the engagement and throughout the relationship, any warning signs ("red flags"), such as a history or allegations of corruption or fraud; a lack of the qualifications, experience or resources required for the services; the third party having been recommended or requested by a Public Official; requests for unusually high fees, commissions or success fees, for payment in cash, to a person other than the contracting party or to an account in another country; a refusal to provide information on its beneficial owners or to accept anti-corruption clauses; or invoices that do not accurately reflect the services rendered. If a red flag cannot be resolved to the CPO's satisfaction, the engagement must not proceed or continue.

Throughout the contractual relationship, payments must be properly recorded, auditable and monitored, in order to prevent situations that could compromise Marimaca under applicable anti-corruption laws or criminal rules.

8. TRAINING AND COMMUNICATION

Marimaca will promote a culture of integrity in its relations with Public Officials through the periodic training of its Team Members, Suppliers and other persons subject to this Policy. This training will cover the rules for interacting with Public Officials, transparency and traceability duties, the legal prohibitions on bribery and the misuse of public resources, as well as the good practices and obligations arising from Law No. 20,730 on Lobbying and Interest Management.

Training will be mandatory for all persons who participate in procedures, dealings, inspections or direct relationships with the State Administration, as well as for those who perform institutional representation functions or supervise third parties in such processes. Such persons will confirm annually that they have read, understood and complied with this Policy through the Conflict of Interest Declaration, in accordance with the Conflict of Interest Management Policy, and the CPO will keep a record of the training delivered.

This Policy will be communicated through internal channels and will be available on Marimaca's website. Reading and understanding it will be mandatory for all new hires, whether employees and advisors or Suppliers, and it will form part of the formal onboarding process.

Questions regarding the application of this Policy, or as to whether a specific situation should be disclosed, may be directed to the CPO by email at cumplimiento@marimaca.com

9. CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with the duties set out in this Policy, whether by act or omission, will be considered a serious breach of the contractual, ethical and regulatory duties governing Marimaca's relations with the public sector. The following will be considered particularly serious: conduct that fails to meet the minimum safeguard standards established; failure to declare personal ties or interests that may affect impartiality in a relationship with public authorities; the offer, promise or delivery — direct or indirect — of any kind of undue advantage to a Public Official; the false, incomplete or misleading recording of any payment or

expenditure involving a Public Official; failure to report a known breach of this Policy; retaliation against any person who reports or cooperates in good faith; or the falsification, alteration or concealment of information in the context of an inspection, audit or procedure before a state entity.

In the case of Team Members, such breaches may give rise to disciplinary measures, including termination of the employment contract for serious breach, as provided for in the Internal Rules on Order, Health and Safety and applicable labour legislation. In the case of Suppliers, non-compliance with this Policy may result in the early termination of the relevant contract, without any right to compensation, as well as their exclusion from future selection or contracting processes with Marimaca.

In any of these cases, and especially if a violation or suspected non-compliance is detected, Marimaca may initiate an internal review led by the CPO in order to assess whether the contractual relationship should be maintained and to adopt the appropriate disciplinary, contractual or legal measures.