

Code of Business Conduct

FOUNDATIONS OF OUR POLICY

The Code of Business Conduct of Central Costanera S.A. (hereinafter, "CECO") reflects the best practices that Directors, Managers, Supervisors, and all employees are expected to observe in the course of their business operations and professional activities. Company policy requires the maintenance of high standards of personal and business ethics in the performance of their duties and responsibilities.

The formal policies underlying this Code are more detailed than the information contained in this document. Each Director, Manager, Supervisor, and employee is responsible for familiarizing themselves with the specific Company policies applicable to their respective roles and obligations.

This Code is mandatory and fully applicable to all employees, as well as to any third parties acting on behalf of the Company.

GENERAL PRINCIPLES

1. OUR RELATIONSHIP WITH SHAREHOLDERS

Our shareholders are the owners of the Company, and we are accountable to them for our performance through periodic reports, the annual report, and Shareholders' Meetings.

Compliance with applicable laws and with the regulations of the National Securities Commission must be a continuous priority.

Any material non-public information available to Company executives must be handled with strict confidentiality and in full compliance with applicable laws and regulations.

2. OUR RELATIONSHIP WITH CUSTOMERS

Customer service must be a top priority, delivered with attentiveness and a commitment to meeting their needs.

3. OUR RELATIONSHIP WITH EMPLOYEES

3.1. Employees are the Company's most valuable and sensitive asset.

3.2. We reaffirm our commitment to equal opportunity for all individuals, without discrimination based on race, gender, sexual orientation, religion, creed, or socioeconomic status.

3.3. Disabilities that do not prevent an individual from performing the essential functions of a role shall not constitute grounds for exclusion in recruitment or selection processes.

3.4. The Company shall maintain open and constructive relationships with its employees. Ongoing communication and the timely sharing of relevant information foster a stable and positive working environment.

3.5. Training is an essential tool for strengthening employees' technical skills while also supporting their professional development and personal growth. Such training shall also include legal topics that promote sound business practices in relationships with customers and suppliers. For employees whose roles involve interaction with the public sector, training shall also cover matters related to the Corporate Criminal Liability Law and the Public Ethics Law.

4. OUR SUPPLIERS

Suppliers shall be selected based on the quality and competitiveness of their products and services, their ethical, professional, and tax compliance record, and their adherence to the standards and requirements established by the Company.

4.1. Friendship, personal relationships, or any other form of association with suppliers must not influence the selection of suppliers, the engagement of their services, or the purchase of their products.

PRINCIPLES OF INDIVIDUAL CONDUCT

5. HEALTH, HYGIENE, OCCUPATIONAL SAFETY, AND THE ENVIRONMENT

All employees are responsible for complying with the policies and procedures established to protect their own health and safety, as well as that of their co-workers, to maintain a healthy and positive work environment, and to contribute to environmental protection and sustainability.

6. SAFETY OF PEOPLE, INFORMATION, AND COMPANY ASSETS

6.1. All personnel must cooperate in complying with the safety and security policies established to protect the life, health, and well-being of individuals, safeguard Company information, and preserve Company assets.

6.2. Safety and security are not the sole responsibility of a designated function or individual. They depend on a shared culture of awareness and responsibility that fosters a secure and respectful workplace, free from violence, theft, and other conduct that may jeopardize the Company, its assets, or its personnel.

7. RELATIONSHIPS AMONG EMPLOYEES

7.1. Employees shall contribute to fostering a collegial and respectful work environment that supports effective collaboration and teamwork.

7.2. The Company is committed to providing equal opportunities to all employees through its hiring, development, and promotion practices.

7.3. Mutual respect, loyalty among colleagues, teamwork, a strong sense of shared purpose, and a spirit of cooperation should be encouraged and reflected in the conduct of all employees.

7.4. Discrimination based on race, color, age, gender, sexual orientation, religion, nationality, or any other protected characteristic is strictly prohibited. Likewise, rude, abusive, or offensive behavior and language will not be tolerated. All individuals must be treated with dignity and respect and must not be subjected to arbitrary interference in the performance of their duties and responsibilities. Violations of this principle may result in a severe disciplinary action.

8. HARASSMENT

It is Company policy to provide a work environment free from harassment. Depending on the facts and circumstances, harassment may include, but is not limited to, the following:

8.1. Verbal or Written Harassment: Derogatory, offensive, or inappropriate comments relating to an individual's race, color, gender, sexual orientation, religion, ancestry, ethnicity, disability, age, or appearance. This includes threats of physical harm and the creation, display, or distribution of materials that have such an effect.

8.2. Physical Harassment: Hitting, pushing, or any other form of aggressive physical contact. Threats of such conduct as well as obscene, intimidating, or offensive gestures, are also prohibited.

8.3. Sexual Harassment: Unwelcome conduct of a sexual nature, whether physical, verbal, or written, including sexual advances, requests for sexual favors, and other verbal, nonverbal, or physical conduct of a sexual nature, regardless of whether such conduct is intended to initiate or promote an intimate relationship.

The fair and consistent enforcement of performance standards and workplace rules by supervisors and other members of management shall not constitute harassment. Reports of harassment will be investigated promptly and with the utmost discretion. Any substantiated acts of harassment will be subject to severe disciplinary action. Under no circumstances will retaliation be taken against an employee who, in good faith, reports an act of harassment, including sexual harassment.

9. RELATIONSHIPS WITH CUSTOMERS AND SUPPLIERS

9.1. Employees shall conduct their relationships with customers and suppliers in a professional, honest, and ethical manner. All contractual commitments must be honored and performed in good faith.

9.2. Employees shall not accept any gift, hospitality, favor, benefit, or other advantage that could, by its nature or value, influence or appear to influence the impartial performance of their duties. Such prohibited benefits may include bribes, high-value gifts, gratuities, favors, hospitality, or any form of payment intended to improperly influence a business decision or provide a personal benefit to the employee.

9.3. Customers and suppliers shall be informed that Company policy prohibits the acceptance of such gifts.

9.4. The Company recognizes that certain gifts may be offered as a customary gesture of business courtesy. In such cases, employees may accept gifts only if they comply with the following requirements. Any gift that does not meet these criteria must be politely declined or returned.

- Only customary institutional gifts may be accepted.
- The value of any gift must be reasonable and consistent with customary business practices.

9.5. As the Company works with confidential and privileged information belonging to customers and suppliers, employees shall not disclose or use such information outside the Company without proper authorization.

9.6. The prohibition against accepting bribes applies equally to the payment of bribes. No Director or employee of the Company, regardless of position or seniority, may offer or pay bribes, whether in cash or in kind, for the purpose of influencing the decisions of another person in order to obtain business for the Company.

9.7. Facilitation payments, in any form whatsoever, are strictly prohibited within our Company.

10. RELATIONSHIP WITH THE PUBLIC SECTOR

In accordance with the applicable Corporate Criminal Liability Law and Public Ethics Law, Company employees whose responsibilities involve interaction with any area of the Public Sector shall exercise due diligence at all times and avoid engaging in any conduct that could be deemed incompatible with the proper exercise of public functions, the illicit enrichment of public officials, bribery, trading in influence, extortion, or the preparation of false financial statements or reports. These offenses are addressed under Sections 265, 268, 258, 258 bis, and 300 of the Criminal Code.

11. CONFIDENTIALITY

Any information obtained by an employee in connection with their employment with the Company shall be considered confidential. Such information may be used solely for the performance of the employee's duties and responsibilities. Employees shall not disclose confidential information, by any means, to third parties outside the Company or to Company personnel who do not have a legitimate need to know such information for the performance of their duties, except where disclosure is necessary for the proper performance of the employee's responsibilities.

12. INTELLECTUAL AND INDUSTRIAL PROPERTY

All CECO employees shall respect and safeguard intellectual and industrial property rights.

Employees must exercise particular care in protecting information relating to the Company's intellectual and industrial property. Likewise, they shall respect the intellectual and industrial property rights of customers, suppliers, and any company or individual that conducts business with or on behalf of the Company.

Respect for intellectual and industrial property rights is of paramount importance, particularly in the use of software, music, texts, and other works used as a basis for carrying out internal activities.

13. CONFLICT OF INTEREST

Employees of CECO are employed on a full-time basis. Accordingly, any external employment or professional activity within the electricity market is, in principle, considered incompatible with their duties at the Company.

Employees' private business activities must not interfere with their responsibilities at the Company, create conflicts of interest, or be related to the business activities of the Company or the economic group to which it belongs.

Employees are prohibited from holding any direct or indirect financial or other interest in the business of a CECO competitor, customer, or supplier.

Teaching activities at schools and universities are encouraged as they contribute to the professional standing of employees; however, such activities must not interfere with working hours and must not adversely affect the interests of the Company. Any employee who has doubts regarding a potential conflict of interest shall report the matter to their direct supervisor with sufficient transparency and good faith to enable an appropriate resolution approved by General Management. If necessary, the employee may escalate the matter to the Compliance Officer, who will address the concern in accordance with this Code.

14. INSIDE INFORMATION

For the purposes of this Code, "Inside Information" refers to information that relates directly or indirectly to an issuer and/or its financial instruments, is not available to the general public, is of a precise nature, and, if made public, could have a material effect on the price of the relevant securities.

Employees who have access to information of any kind or level, particularly information relating to stock exchange transactions or the Company's securities, or those of companies in which the Company holds a significant interest, are strictly prohibited from trading in shares or other securities of such companies, whether directly or indirectly through third parties, on the basis of such Inside Information.

15. POLITICAL ACTIVITIES

The Company fully supports the republican and democratic system of government. Employees may take an active interest in promoting the principles of good governance in the country and communities in which they live.

Employees may use their personal time and resources to support political candidates or issues of their choice; however, under no circumstances shall such activities be reimbursed by the Company, nor shall employees use or imply their affiliation with the Company in connection with any political activity.

Employees must also ensure that their personal political contributions and activities comply with all applicable laws and regulations.

16. USE OF THE COMPANY ELECTRONIC MEDIA AND SYSTEMS

The Company provides employees with communication tools and information systems to support their work and to enable them to perform their duties more efficiently.

These resources are the property of the Company and not of the employees. Their use is therefore limited to work-related activities and communications strictly connected to CECO's business and the employee's assigned responsibilities.

The use of CECO's systems and communication resources for personal purposes, for the dissemination of content unrelated to Company business, or for the transmission of pornographic, political, or any other non-work-related material is strictly prohibited.

The Human Resources Department, with the authorization of General Management, reserves the right to monitor and audit Company-provided systems and resources in order to ensure compliance with this provision.

17. ACCOUNTING RECORDS AND PROCEDURES

Applicable laws and Company policy require CECO to maintain books and records that accurately and fairly reflect all transactions and dispositions of assets. In addition, the Company must maintain a system of internal accounting controls that ensures the reliability, completeness, and timely accuracy of its books and records, as applicable. Failure to comply with these requirements may constitute a violation of applicable law.

Directors, Managers, Supervisors, and employees with responsibilities in these areas must be fully familiar with the Company's policies relating to the control and maintenance of accounting records.

18. FRAUD, VIOLATIONS OF THE CODE, AND REPORTING CHANNELS

All employees must comply with all applicable laws and regulations in the performance of their assigned duties.

Directors, Managers, Supervisors, and employees are required to protect Company resources and ensure their efficient and appropriate use. Theft, negligence, and waste of Company resources are strictly prohibited, as such conduct may have a direct and adverse impact on the Company's profitability.

Any employee who suspects or becomes aware of a possible fraudulent act, or any conduct that may constitute a violation of this Code, must report it through the designated reporting channels. The Company will maintain the confidentiality of reports and, where permitted by applicable law, the anonymity of individuals who report potential violations in good faith.

19. REPORTING CHANNEL

If you wish to report any irregularity or non-compliance with this Code of Conduct, you may do so confidentially through:

☎ 0-800-999-4636 | ☎ 0-800-122-7374

✉ etica.centralcostanera@resguarda.com

🌐 www.resguarda.com/centralcostanera

The Company has established a reporting procedure for the management of reports, which sets out a methodology for the receipt, assessment, investigation, and handling of reports submitted through any of the Company's designated reporting channels.

20. COMPLIANCE OFFICER

The Compliance Officer is responsible for the implementation, management, and oversight of this Code of Conduct and of the Integrity Program as a whole. The Compliance Officer acts as a guide and advisor to all employees and Directors, ensuring that all Company activities are conducted in accordance with the highest ethical standards.

21. DISTRIBUTION

The Code of Business Conduct is a fundamental component of the Company's corporate governance framework. A summary of the Code is distributed to employees in printed and/or digital form and is made available on the Company's intranet. It is also published on the Company's website (<http://www.centralcostanera.com>).