

# CODE OF ETHICS

### **CODE OF ETHICS**

### PE-GC-MA02

Multiexport Foods S.A.

#### **Subsidiaries**

Multi X S.A.

Salmones Multiexport S.A.

Alimentos Multiexport S.A.

Multiexport Pacific Farms S.A.

Multiexport Patagonia S.A.



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### LETTER FROM THE CHAIRMAN

Dear collaborators,

We are pleased to present to you our Code of Ethics, crafted with the purpose of establishing the fundamental principles and behaviors that guide the performance and conduct of all those who are part of Multiexport Foods S.A. and its subsidiaries.

What sets us apart is our commitment to a culture based on excellence, respect for individuals, a focus on sustainability, and the pioneering spirit with which we undertake our projects.

Understanding and applying the principles and behaviors outlined in this Code enable us to act appropriately in the various activities we engage in daily, ensuring that our behavior is consistent with what Multi X expects from each of us.

Our Code directs us in fulfilling the responsibilities we have towards our shareholders, collaborators, authorities, communities, clients, suppliers, business partners, and society at large, who will continue to distinguish us with their trust in the organization.

I invite you to read and reflect upon the content of this Code of Ethics and to commit to integrating it into your daily actions, thereby contributing to the ethical and sustainable growth of our Company.

José Ramón Gutiérrez Arrivillaga.

Chairman of the Board

## INTRODUCTION

The ethical principles and behaviors outlined in this Code should serve as a guide for the conduct of all individuals who perform functions or tasks of any nature in Multi X S.A. or any of its subsidiaries. This includes members of the Board, top executives, employees, service providers, and Company suppliers.

The individual or collective actions we take in the course of our respective duties must be grounded in the ethical principles set forth in this Code and in the Company's Mission, Vision, and Values, which are as follows:

#### **Purpose**

Feeding the future, caring for the world.

#### **Mission**

We produce premium salmon in southern Chile and bring it to tables around the world, positively impacting the lives of people and our planet.

#### **Vision**

To be the leader in the sector, recognized for its sustainable operation, centered on people and efficiency, delivering the best salmon to tables in Chile and around the world.

#### VALUES



### **People First:**

- Integrity and the safety of others are always our priority.
- We operate from a foundation of honesty, courtesy, and tolerance. We are mindful of how we communicate and convey our ideas.
- We show respect for all individuals, contributing to integration and inclusion.
- We engage in learning opportunities provided by the company and support the development of our own skills and the skills of our teams.



# **Driven by Excellence:**

- We do things right, aiming for excellence in achieving goals and tasks.
- We are committed to the safety and quality of our products.
- We fulfill what we promise and meet defined deadlines.
- We act with professionalism and responsibility in every aspect of our lives.



# **Living Innovation:**

- We make things happen, being open to new challenges and driving change with a flexible attitude.
- We always seek the best results and set continuous improvement and excellence as our goals.

 We look for solutions to problems that may arise in our roles and contribute to our teams with improvement ideas.



# Sustainability is Our Commitment:

- We understand the value of connecting with the communities in which we operate and support collaborative work with them.
- We always seek collective well-being, minimizing the impacts of our actions both within the company and in the areas where our operations are located.
- We ensure the fulfillment of our sustainable objectives, collaborating on measures for environmental protection and harmonious coexistence with those we share our surroundings with.

### Scope of the Code

This Code of Ethics is mandatory for all individuals who collaborate with Multiexport Foods S.A. and its subsidiaries. It encompasses a set of basic, illustrative principles that effectively contribute to the achievement of our mission, vision, and values.

#### I. Ethical Standards

# 1. RELATIONSHIP WITH OUR COLLABORATORS

### 1.1. Employee Onboarding

Individuals who become part of our team must align with the values and principles of Multiexport Foods S.A. and its subsidiaries, hereinafter referred to as Multi X, the Company, or the Organization. Individuals join Multi X through a non-discriminatory selection process that ensures equal employment opportunities and respects the legal and cultural framework of the respective country, taking into account global humanistic principles.

Applicants should possess the capacity, skills, and professional experience necessary to fulfill their current responsibilities and those that may arise in the future. Personnel selection processes should be transparent, inclusive, and competitive, ensuring equal opportunities in employment.

Decisions regarding the hiring of our collaborators will be made based on their competencies, skills, preparation, and experience.

#### 1.2. Commitments of Multi X

We aim to create a healthy and productive work environment within Multi X that harnesses the best from each individual and encourages collaboration among its team members, allowing for harmonious teamwork. Therefore, all levels of Multi X have the duty to commit to:

- Compliance with Labor Laws and Regulations: Ensure adherence to current labor laws and regulations.
- Non-Discrimination and Prevention of Harassment: Avoid

all forms of discrimination based on sexual orientation, race, religion, social status, politics, gender, color, union membership, national origin, or marital status. Prohibit psychological, workplace, and sexual harassment, as well as any form of arbitrary discrimination.

- Well-being of Employees: Prioritize the physical and emotional well-being of all individuals working in the company.
- Safety and Security: Safeguard the integrity of personnel and facilities through the use of equipment, devices, systems, and company security procedures.
- Accident and Illness Prevention: Establish ongoing programs for the prevention of accidents and occupational diseases.
- Environmental Responsibility: Protect the environment and take responsibility for the consequences of Multi X's actions in the places where we operate.
- Appropriate Working Conditions: Provide suitable working conditions, healthy environments, safety, and pollution-free surroundings.
- Competitive Compensation and Benefits: Offer competitive compensation and benefits in accordance with the terms set by Multi X, promoting challenges for employees and recognizing the personal contributions and performance of each individual.
- Professional Development: Ensure adequate training and professional development opportunities, creating instances for continuous training, education, and improvement.
- Open and Respectful Communication: Encourage open and respectful communication, providing feedback spaces.

- Performance Evaluation and Promotion: Base decisions on the evaluation and promotion of team members on performance and goal achievement, as well as individual aptitudes and competencies.
- Harmonious Relations with Unions: Respect and maintain harmonious human and professional relationships with unions and union leaders, fostering fluid and cooperative communication with them.

## 1.3. Responsibilities of Personnel

Multi X expects its collaborators to commit to the following:

- Familiarity with the Code of Ethics: Understand and act in accordance with the provisions outlined in this Code of Ethics.
- Comprehensive Understanding of the Company: Acquire in-depth knowledge of the company and the activities of Multi X. Commit to The purpose, mission, vision, and values of Multi X.
- Alignment with Principles and Values: Work in accordance with the principles and values on which Multi X bases its existence
- Dedication of Talent and Effort: Dedicate their talent and best efforts to Multi X.
- Sharing Knowledge and Experience: Share knowledge and experience for the benefit of Multi X, its collaborators, and the communities in which it operates.
- Proactive Engagement with Development Opportunities:
  Proactively engage with the training and development opportunities provided by Multi X.

- Consistent, Honest, and Responsible Commitment: Fulfill commitments consistently, honestly, and responsibly.
- Adherence to Health and Safety Standards: Adhere to and ensure compliance with health and safety standards.
- Promotion of Multi X Values in the Community: Act as a promoter of Multi X values within the community.

## 1.4. Relationship among Multi X Collaborators

We believe in respect, collaboration, communication, and the proper management of the efforts of each Multi X collaborator.

#### Respect

We understand respect as recognizing, accepting, appreciating, and valuing the qualities of others, considering their individual differences, personal interests, values, capabilities, competencies, weaknesses, strengths, preferences, fears, and/or feelings.

#### Collaboration

All of us contribute our efforts, knowledge, and experiences for the success of our common project. We must prioritize the overall outcome for Multi X over the individual interests of each person, unit, or area. Never sacrifice the long-term interests of the company for short-term results. Contribute to a healthy work environment that stimulates and energizes us, where people are treated and valued with impartiality and respect. Motivation should always be rooted in a spirit of collaboration and loyalty, achieving positive results for the organization.

#### Communication

We will listen before expressing opinions, refrain from forming premature judgments, and gather as much information as possible before taking positions, actions, or decisions. We must participate constructively and respectfully in debates. Disagreeing with respect is part of communication. We will not pass judgment on others without grounds, providing positive feedback privately with arguments and loyalty. We will promote Multi X values through behaviors and practices encouraged in this Code of Ethics.

#### **People Management**

We must establish challenging objectives with an emphasis on results and respect for the principles and values of Multi X. Create a space for dialogue and idea exchange that encourages constructive, reasoned, and loyal feedback, allowing each member to improve. Individuals responsible for managing a group of collaborators for organizational reasons must exercise their authority responsibly and ethically, ensuring a healthy work environment of cooperation and rejecting any abuse of authority and negligent performance. Our concern will always be to act in the service of the development of Multi X, fostering open and trusting relationships between supervisors and subordinates, thus preventing and resolving conflicts, disputes, and dissatisfactions while considering the best client service. We will present the work to be done as an intellectual challenge. We will recognize well-done work and highlight it when appropriate.

# 2. RELATIONSHIP WITH OUR CLIENTS

# 2.1. Selection of clients and/or Markets

Multi X upholds high ethical standards in the selection of clients. We value diversity and equality, declaring a policy of non-discrimination against potential clients based on race, religion, gender, sexual orientation, or nationality. It is the obligation of our clients to respect laws and regulations. It is

also relevant to assess the financial integrity of our clients to ensure they can meet their financial commitments. Transparency and truthfulness are fundamental pillars in our relationship with clients, and we expect them to provide accurate and complete information about their companies and projects. We seek to partner with clients who share our vision of social and environmental responsibility, demonstrating a commitment to societal well-being and environmental care. We recognize the importance of continuous and periodic assessment of our clients to ensure they continue to meet our ethical standards, and if not, we reserve the right to reject or discontinue the relationship with them.

#### 2.2. Commitments and Promises

Client orientation is key and critical to our business. The trust gained must never be jeopardized. Promises are fully honored, and commitments are only made if we know they can be fulfilled. If, due to unforeseen circumstances, a committed obligation cannot be fulfilled, it is the duty of the involved person to inform their immediate supervisor and then the client, taking all necessary measures to minimize the consequences, client orientation is paramount. We commit to actively listen to their needs and expectations, providing personalized solutions tailored to each situation. We value the trust they place in us and strive to fulfill our promises, maintaining open and transparent communication. Our team works with dedication and empathy to deliver exceptional service, respecting the privacy and confidentiality of the information entrusted to us. We aim to foster lasting relationships based on excellence and mutual trust, always seeking to make a positive impact on the lives of our clients and contribute to their success and well-being.

### 2.3. Geographic Diversification

When managing our businesses, we must comply with and consider the laws of the various nations where we operate, involving customs and practices that must be understood. All of us must consult our legal advisors to ensure exact compliance with the regulations of each nation. We must also immediately report to our immediate supervisor, or their substitute, any relevant information about intentions or facts of third-party business practices that do not align with our principles and values.

#### 2.4. Gifts and Invitations

Gifts that are modest marketing material (not exceeding \$15) and invitations to meals or events from clients are allowed only if they are related to a legitimate business purpose and cannot be interpreted as an attempt to compromise the independence in decision-making of the Multi X collaborator. Negotiations must always be transparent and objective. If the collaborator receives a gift or invitation that exceeds the conditions described above, they must follow the guidelines established in section 7.5.

# 3. RELATIONSHIP WITH SUPPLIERS, CONTRACTORS, AND SUBCONTRACTORS

# 3.1. Equity and Justice in the Relationship

All contractors and suppliers have an equal opportunity to be selected to work with Multi X, considering the regular hiring process and the established criteria of quality, service, cost, and specific project needs. In no case will they be arbitrarily discriminated against. In all cases, Multi X will prefer, under equal conditions, contractors and subcontractors with high

safety standards for their own employees.

# 3.2. Respect in Contract Terms, Licenses, Laws, and Regulations

At Multi X, we honor the agreements and commitments established in contracts. We respect the rights of third parties, and as such, employees cannot establish business relationships with subcontractors or suppliers who have not demonstrated their ethical and legal authority to operate as providers of goods or services.

# 4. RELATIONSHIP WITH THE STATE, GOVERNMENT, AND PUBLIC INSTITUTIONS

## 4.1. State as the Guiding Authority

It is our policy to know, comply with, and promote compliance with laws, regulations, standards, and other applicable legal provisions established by the governments of the countries in which we operate.

#### 4.2. State as the Client

It is our responsibility to fully comply with all requirements established by the laws and regulations of the countries in which we operate when developing projects for a specific country's government.

### 4.3. State as the Supplier

In this relationship with the State, everything described in the previous chapter "Relationship with Suppliers, Contractors, and Subcontractors" applies.

#### 4.4. Government as the Promoter

When a government promotes activities that foster the development of communities, Multi X regulates this relationship under the criteria outlined in the next chapter, "Relationship with the Community"

#### 4.5. Interaction with Government Officials

It is the responsibility of the company's personnel to verify that they have the authority to interact directly with government officials. Under no circumstances can we promise, offer, pay, lend, give, or in any way transfer any funds, assets, or valuable items from the Company to any government official, employee, or entity outside the framework of legality and Multi X policies.

#### 4.6. Technical Collaboration with the Government

Our company may temporarily provide human resources with the appropriate profile and preparation to technically support a government program that benefits the community at large. This depends on the authorization of the government of each country in which we operate.

# 5. RELATIONSHIP WITH THE COMMUNITY

# 5.1. Multi X's Participation in Community Development Programs

Within the context of our Community Relationship actions, Multi X has created the Citizen Program Multi X, which includes 5 pillars: Multi X Community, Connection and Action, Open House, Shared Value, and Foundations for the Future.

The Citizen Program Multi X aims to promote integration, development, and an increase in the quality of life in the communities where we carry out our projects, representing a social improvement in the areas where Multi X operates. This participation may involve presence, advice, advocacy, sponsorships, or other types of support often linked to its products, equipment, and services.

Participation in Community Development: We will participate as long as the following conditions are met:

- Not Prohibited by Law: The initiative must not be prohibited by law.
- Approval by Management: It must be approved by the designated Management, considering the benefits it brings to the Company's operating environment.
- No Assumption of Obligations: It should not involve assuming obligations or responsibilities for others.
- Endorsement by Local Authorities: It should encompass programs endorsed by local authorities.
- Community Development Focus: The initiative should be oriented towards community development, promoting culture, health, education, sports, and/or the environment,

among other aspects.

- Accounting Records: It should be reflected in Multi X's accounting records according to established policies.
- Acknowledgment from Beneficiaries: An explicit acknowledgment of receipt from the beneficiary, including the amount or nature of the contribution, as well as the recipient and purpose of the contribution, must be obtained.
- No Personal Benefits: It is not allowed to seek or receive personal benefits as a result of the Company's support to the community.

In these actions, we aim to transcend and generate long-term benefits for the communities.

# 5.2. Employee Participation in Community Development

Employees of our company should be a true reflection of the values that underpin our organization. We support the participation of our employees in community projects that have been previously approved by the Company, provided that it does not disrupt the fulfillment of their duties or obligations. False expectations about the support that the Company can provide should not be generated.

### 5.3. Supplier Development and Hiring Local Personnel

We prioritize hiring local personnel and developing suppliers of goods and/or services that are also local, to the extent possible and while adhering to competitive commercial conditions. We value their technical capacity, quality, competitiveness, and acquired experience, in addition to sharing the values of our Company.

# 6. RELATIONSHIP WITH COMPETITION

### 6.1. General Background

Our policy in this regard is to act in a way that preserves market transparency and its competitive dynamics in relationships with our competition. Likewise, our policy in relation to competition is one of cooperation in all matters that ethically correspond, especially those related to adopting better health, environmental, and safety conditions for people and collaborators.

### 6.2. Participation in Trade Associations

Our policy involves participation in trade associations and their activities, particularly when they share our values. In particular, Multi X seeks agreements in trade associations that are not prohibited and represent lawful economic benefits, such as cooperation agreements in research, technology development, compliance with technical, sanitary standards, and other similar agreements in which the administrative authority has a role.

## 7. CONFLICT OF INTEREST

Conflicts of interest, whether potential or perceived, must be reported, informed, and managed as appropriate. A conflict of interest arises when an employee's interests or activities affect or give the appearance of affecting the judgment, objectivity, or independence of the employee. All employees have the obligation to report to their immediate supervisor, division manager, or People Management, any situation that may be considered a conflict of interest, whether real, apparent, or potential.

Common activities that must be reported:

# 7.1. Personal with External Interests or Independent Businesses

Employees and top executives must not have external interests or independent businesses that divert the use of their work time and/or attention from their duties, nor receive income and/or benefits from suppliers, competitors, or clients.

#### 7.2. Personal as a client of Multi X

Employees must not have businesses dedicated to the marketing or transformation of products or services associated with Multi X's business.

# 7.3. Personal as a Supplier

Employees cannot be suppliers to our Company..

### 7.4. Family Members as client:

A conflict of interest situation arises when an employee, directly or indirectly, their relatives (spouse, parents, children, siblings, cousins, or others), civil partner, or a person living with them, holds shares, rights, or any other interest in a company related

to Multi X or its subsidiaries. Multi X personnel must notify their immediate supervisor or the Crime Prevention Officer through the inquiries section of the reporting channel https:// lineaetica.multi-xsalmon.com/immediately if they have a direct or indirect family relationship with suppliers, clients, or competitors of our Company, or with executives or employees relevant to suppliers, clients, or competitors of Multi X, to avoid influencing normal decision-making processes involving these negotiations. In case of such relationships, any business decision with the affected client or supplier must be made by the hierarchical superior of the employee related to that client or supplier. Shareholders who have or intend to have a commercial relationship with MULTI X are subject to the same procedures and conditions as the rest of our suppliers and clients. In the event of other types of conflicts of interest, whether real, potential, or apparent, not considered in this code, employees are expected to report these situations through the "Declaration of Conflicts of Interest" which must be requested from People Management.

#### 7.5. Declaration of Conflict of Interest

- Every employee must complete a declaration of conflict of interest upon joining the Company. The same obligation applies to those collaborators who take on a new position within the Company.
- II. Annually, employees will be asked to complete the "Declaration of Conflict of Interest" This process will be managed by People Management in conjunction with the Crime Prevention Officer

#### 7.6. Gifts and Invitations

Employees of Multi X are prohibited from requesting or receiving gifts, with "gift" being broadly defined to include items such as presents, money, services, among others, provided by third parties related to the Company or seeking to do business with it. Exceptionally, gifts that are minor marketing materials, of modest value (not exceeding \$15), typically known as Merchandising material, may be accepted. Such acceptance should not be interpreted as an attempt to compromise the independence in decision-making of the Multi X employee.

#### 7.7. Gifts from Third Parties

In any case where a Multi X employee is the recipient of a gift that does not meet the description above, they must inform the Crime Prevention Officer and return the gift to the sender accompanied by a thank-you note, indicating the prohibition established in the company's internal policies. If a Multi X employee is offered cash or its equivalent, the employee must refuse to accept it and immediately inform the Crime Prevention Officer or the reporting channel established by the Company.

#### 7.8. Invitations from Third Parties:

Invitations to meals or events from third parties are allowed only if they are related to a legitimate business purpose and cannot be interpreted, under any circumstances, as a deliberate attempt to affect the independence and impartiality of the Multi X employee. Additionally, the invitation must be understood as extended to the Company, and attendance must be authorized in advance by the Area Manager or the General Manager. Furthermore, attendance should be with a company representative as well. Excessive or overly generous invitations should be declined. Invitations to business trips

must be extended to the Company and have a clear business purpose. All travel invitations must be communicated to the Crime Prevention Officer and the General Management, with the latter having the authority to approve them via email. In any case, travel expenses will be borne by Multi X. The Crime Prevention Officer will keep track of all travel invitations received, approved or not, as well as the record of approval emails. Invitations at the cost of the host are exceptionally authorized for the participation of a Multi X employee as a speaker at conferences or seminars, and such instances should be reported as indicated in this point 7.

### 7.9. Gifts and Invitations offered by Multi X

It is prohibited for a Multi X employee to give or offer gifts to third parties related to the Company, except for minor merchandising materials defined and provided for this purpose by the Marketing department, if applicable. For donations or contributions to the community, the respective procedure under the responsibility of the People, Sustainability, and Corporate Affairs Management must be followed. Exceptionally, the Company may organize business-related trips for third parties to our facilities, covering airfare and accommodation only with the prior approval of the Commercial Manager and the General Manager, informing the Crime Prevention Officer at the same time. These trips must be in the context of legitimate business relationships and must not be interpreted, under any circumstances, as an attempt by the Company to influence the decisions of the third party. It is expressly prohibited to cover the costs of trips or stays for national or foreign public officials, unless, at the express request of a public official, and in the exercise of their functions, they request a transfer to Company facilities, for example, auditors. Activities related to relations with investors, seminars, and others that are corporate activities are outside these guidelines and will be treated according to each case.

Similarly, gifts or attentions within the framework of marketing campaigns are outside this policy. However, controls must be implemented in this matter to comply with the Company's Crime Prevention Model. In case of any doubt about how to proceed in a particular situation related to this matter, it must be communicated to the Crime Prevention Officer and resolved by him or by the Ethics Committee.

### 7.10. Bribery and/or Extortion

Bribery and extortion are prohibited at Multi X. Any situation, whether internal or external, that falls within these definitions must be reported immediately to the direct supervisor and the Ethics Committee, following the established channels in section IV of this Code. Failure to do so exposes individuals to legal and administrative sanctions.

### 7.11. Patents and Copyrights

Inventions, improvements, innovations, and developments of any kind generated as a result or on the occasion of the work performed by those working in our Company are the property of Multi X.

# 8. CONTRIBUTIONS AND POLITICAL ACTIVITIES

# 8.1. Political Contributions

All Multi X personnel are free to make political contributions in accordance with the current regulations in their respective countries, provided it is on a personal basis and not directly or indirectly related to Multi X. Political contributions are understood to include the delivery of money, goods, services, rights, or any other personal resource to candidates, political parties, associations, and/or political organizations in

accordance with current regulations in the respective country.

#### 8.2. Political Activities

All Multi X staff members are free to engage personally and outside of office hours in political activities as long as they do not interfere with the fulfillment of their duties and responsibilities to the company. These activities should not involve or associate with Multi X, nor should they use its assets, name, symbols, logos, or any other sign that could be linked to the company. Political activities are understood to include personal political involvement, party membership, candidacy, participation in an electoral campaign, holding a public office of a political nature, or involvement within a political party.

# 9. CONFIDENTIAL AND PROPRIETARY INFORMATION

# 9.1. Definition of Confidential and/or Privileged Information

Given that Multiexport Foods S.A. is a publicly traded corporation listed on the Stock Exchange, employees of its subsidiaries and related companies are obliged to strictly comply with the Corporations Law and Securities Market Law regarding the use of such information and the duty of continuous disclosure to the markets and the Financial Market Commission.

Confidential and/or privileged information should be understood in an illustrative manner and in no case exhaustive, encompassing all information about the company that may be received concerning the following subjects:

- Mergers, acquisitions, partnerships, or expansion plans under negotiation.
- Accounting information and financial projections.
- New projects being evaluated or planned.
- Securities transactions and financing.
- Operational commercial policies and practices.
- Judicial or administrative disputes.
- Organizational changes.
- Fixed and variable remuneration, incentive systems, and benefits.
- Email addresses, positions, phone numbers, and addresses of personnel working in the Company.

- Technology and methodologies.
- Research and development of new products.

Whether it is contained in documents, electronic files, or of any other nature or is transmitted verbally. It should be noted that the confidential nature of the information may cease once it is made known to the market or the Financial Market Commission

### 9.2. Use of Confidential and/or Privileged Information

Our obligation in this matter is not to disclose or communicate confidential and/or privileged information to third parties or unauthorized colleagues within the Company nor to use it for personal benefit. All relevant information, as well as confidential and/or privileged information, is disclosed to the market and the Financial Market Commission in accordance with Chilean legislation and through the Company's official channels, namely the General Management and Administration and Finance Management.

The misuse of confidential and/or privileged information, whether used for personal benefit or for the benefit of others, may have legal consequences, in addition to disciplinary sanctions established by the Company for such cases.

# 9.3. Information Requests by Authorities and Third Parties

For such a request to be fulfilled, it must be submitted in writing, meet the requirements established by law, be authorized by the immediate superior, and have been reviewed and approved by the Legal Department or the Board of Directors, as appropriate. Only authorized spokespersons, as defined by the General Manager, are allowed to provide information to the media about the company, its subsidiaries, or related companies.

# 10. FINANCIAL CONTROLS AND RECORDS

The financial information and balance of Multi X are public and communicated to the market and the Financial Market Commission (formerly Superintendencia de Valores y Seguros de Chile) in the deadlines and forms indicated in Chilean legislation. While this communication has not been made, it has the status of confidential and/or privileged information for the Directors and Collaborators of Multi X.

Good practices in accounting and strict compliance with applicable accounting standards for Multi X strengthen the credibility and trust of the market. Therefore, we must ensure the integrity and accuracy of our accounting and financial records.

The registration, conservation, and preparation of financial reports for different stakeholders must comply with the corresponding legal provisions, generally accepted accounting principles, and control guidelines issued by Multi X.

Regarding operations that involve recording, they must be supported by documentation that supports the transaction, complies with tax requirements, and is accurate. For their preparation, reasonable detail, registration in the accounting accounts, and entry at the time of the transactions are required.

Financial information can only be shared under the guidelines established in Confidential and/or Privileged Information. It is prohibited to conceal information that could alter financial records and affect or could affect Multi X.

# 11. ASSET PROTECTION

### 11.1. Custody and Conservation of Assets

Everyone is responsible for the custody and conservation of assets under their control. We must never be involved, participate in, influence, or allow actions of theft, misuse, damage, lending, disposal, or sale of assets without authorization. The control over the custody and conservation of assets belongs to the different managements that report directly to the General Management and administratively to the Administration and Finance Management.

# 11.2. Use of Assets for Personal Benefit and Other Purposes

Assets are the property of Multi X, as well as the services available to personnel working in the Company for the performance of their functions and for the benefit of the Company itself.

The assets, facilities, and resources of Multi X S.A. and its subsidiaries must be used only to fulfill their mission, adopting criteria of efficiency, rationality, and savings. If assets are used for charitable or donation purposes, the corresponding prior written authorization from the corresponding management is required, following established policies.

# 11.3. Use and Maintenance of Facilities, Machinery, and Equipment

The facilities, machinery, and equipment of Multi X must be operated only by authorized and trained personnel. It is the responsibility of the involved personnel to keep them in good condition, observe maintenance practices, and apply risk prevention programs. Thus, we promote operational continuity, avoid accidents, and increase the lifespan of our assets.

#### II. Administration of the Code of Ethics

# PROCEDURES TO ESTABLISH CONSULTATIONS, SUGGESTIONS, OR CASES

This Code of Ethics applies to the entire organization and all subsidiaries of Multi X, existing and future, and it is our responsibility to comply with it and enforce it. For this purpose, the communication channels for our employees to resolve their doubts, make suggestions, report exemplary cases, or report misconduct within the organization are as follows:

- Approach their immediate supervisor, and to the extent that this is not possible, the direct supervisor of the latter.
- Utilize the platform for consultations and reports to securely inform situations that may contravene the provisions of the Code of Ethics or potential breaches of current legislation.

Employees and other stakeholders can complete the denunciation or consultation form available at [https://lineaetica.multi-xsalmon.com/](https://lineaetica.multi-xsalmon.com/).

This reporting channel or ethics line is accessible from any computer or mobile device, administered by an external service ensuring confidentiality, and allows for anonymous reporting.

All cases will be handled with seriousness, professionalism, and in absolute confidentiality.

# 2. CONSEQUENCES SYSTEM

When a person engages in conduct harmful to the organization, the consequence is a severe penalty, ranging from a reprimand to termination. Every leadership role bears the responsibility of setting an example in applying and promoting our values, recognizing their team when they exhibit aligned behaviors, and promptly applying sanctions if personnel under their supervision engage in undesirable conduct. Withholding information about a violation of our Code of Ethics itself constitutes a violation and is considered a very serious offense that warrants appropriate sanctions.

# 3. ADMINISTRATIVE STRUCTURE OF THE CODE OF ETHICS:

The administration of the Code of Ethics falls under the purview of the Corporate Ethics Committee, consisting of the following individuals or entities: Chairman of the Board Committee, CEO, a Director, all with the right to voice and vote in the Ethics Committee. Additionally, it will have the Legal Prosecutor with the right to voice and who will act as the Secretary of the Minutes.

It is the responsibility of the Ethics Committee to ensure the proper dissemination and application of this Code of Ethics, which includes:

- Promoting the values and behaviors outlined in this document.
- Serving as a consultative body.
- Channeling cases to the appropriate instance.
- Approving recognitions and corrective actions.
- Generating statistics and reports.

• Reviewing personnel's requests for clarification.

On the other hand, the Ethics Committee has the following functions:

- Updating and modifying the Code of Ethics.
- Investigating and documenting cases selectively.
- Promoting consistency globally in the interpretation and application of the code.

# III. Crime Prevention Model – Law 20.393: Criminal Liability of Legal Entities

## CRIMES OF CRIMINAL LIABILITY

Employees of Multi X S.A. and its subsidiaries, as well as external personnel, including contractors, suppliers, advisors, agents, among others, are expressly prohibited from engaging in any act that could constitute a crime under Law 20.393: Criminal Liability of Legal Entities, associated regulations, and subsequent amendments.

### Be cautious in the giving and receiving of gifts

- Employees, directors, officials, collaborators, agents, or representatives of Multi X S.A. and its subsidiaries must not offer or give gifts to public officials (national or foreign) and/or private individuals, nor accept such gifts from them when these gifts could reasonably be perceived as incentives or commitments or when such actions could discomfort or affect the good image and reputation of Multi X.
- Care must be taken to ensure that invitations to dinners or events related to work matters do not imply, or could be understood as, a commitment, undue influence, or, due to their nature, frequency, or character, could be interpreted as a deliberate attempt to affect the independence, impartiality, or judgment

- of others.
- Multi X S.A. and its subsidiaries declare their opposition to influencing the will of individuals external to the company to obtain any benefit through the use of unethical practices. The company will not allow other individuals or entities to use such practices with its employees.

#### Be alert to

- Clients or third parties refusing to provide complete information, providing manifestly false or suspicious information.
- Payment terms exceptionally favorable to Multi X S.A. and its subsidiaries or payments that, at the request of a supplier, must be made to a country unrelated to the transaction.
- Knowing the client, suppliers, and/or third parties with whom the Companies establish a business relationship, analyzing their background, avoiding association with institutions related to money laundering.

### Criminal Liability of Multi X and its Subsidiaries

In accordance with Law No. 20.393, which establishes the criminal liability of legal entities for the specified crimes in the regulation, the company may be held responsible for the commission of crimes specified in the said Law by employees and dependents within the scope of their functions.

In consideration of the above, the company expressly prohibits any conduct that could lead to the criminal imputation of Multi X S.A. and its subsidiaries under Law No. 20.393 for acts committed by the owners, controllers, directors, officials, executives, representatives, those performing management or supervisory activities, and any collaborator of the company or external person representing the company.

Likewise, it includes natural persons who are under the direct direction and supervision of any of the subjects mentioned above and, in general, any collaborator of the company. In other words, the values and principles disseminated by the company align with what is detailed in the policy and the Crime Prevention Model of Multi X, to avoid any activity that undermines the values and principles provided by Multi X S.A.

### IV. Letter of Acknowledgment

# APPENDIXACKNOWLEDGMENT LETTER OF OUR CODE OF ETHICS

Every member of Multi X must sign this letter as proof of knowledge of its contents and as a commitment to the values of our company. Every member of Multi X is obliged to sign a written confirmation acknowledging that they have received and read the Code and that they are aware that its provisions are an integral part of the rules governing their contractual relationship with the Company.

The guidelines expressed here are not intended to be exhaustive and are complemented by Multi X's policies. Individuals who are part of Multi X have an obligation to inform the Ethics Committee of any deficiencies or weaknesses in internal controls caused by irregular conduct.

Concerns can be directed to the consultation section of our reporting channel: (https://lineaetica.multi-xsalmon.com)

#### **Labor Ethics Committee**

Cristián Swett P.	Corporate General Manager	cswett@multi-xsalmon.com
Irene Campos G.	People Manager	icampos@multi-xsalmon.com
Rubén Bascuñán S.	Legal Prosecutor	rbascunan@multi-xsalmon.com

In case of doubt on these matters, it should be consulted with the Ethics Committee and with the Comptroller, as the Crime Prevention Officer, through the consultation section of the reporting channel [https://lineaetica.multi-xsalmon.com/)

# APPENDIX: ACKNOWLEDGMENT AND RECEIPT OF CONFORMITY

By this act, I declare that I have received a printed copy of the Code of Ethics of
which defines the conduct guidelines for all individuals working in the Company.
I assume the personal commitment to read and understand in detail the contents of this document, comply with and enforce its provisions, and apply it in the performance of all my duties.
I understand that it is my duty to report any irregularities regarding the behaviors and obligations contained in this Code of Ethics.
Likewise, I state that the Company has informed me about the scope of the rules contained in it and the effects arising from its eventual non-compliance.
Name
ID
Position
Management
Company
Signature

