

CONFLICT OF INTEREST POLICY

The Code of Ethics of Austral Group S.A.A. (hereinafter, “Austral”) establishes, among its policies, the obligation to avoid any situation in which the personal interests of any director, manager, officer, attorney-in-fact, legal representative, or employee (each of them hereinafter referred to as an “employee”) may compete with or conflict with the interests of Austral. Should such a situation arise, it must be reported and properly managed in a timely manner.

In line with the above, every employee is expected to carry out their responsibilities with integrity, transparency, and loyalty toward Austral. Conflicts of interest may arise directly or through a spouse, domestic partner, family member, close friend, or any third party with whom the employee has a relationship.

All Austral employees must complete the Annual Conflict of Interest Affidavit (the “Affidavit”). This affidavit includes relationships up to the fourth degree of affinity or consanguinity, as well as any ownership or economic interests they may have in Austral or in its suppliers, subcontractors, customers, competitors, governmental or regulatory bodies, and related companies in the sector (including those that provide goods or services to Austral’s suppliers or customers).

The employee must also disclose any type of close friendship they may have with any company that is directly or indirectly related to Austral, as well as any other type of relationship not previously contemplated (e.g., godparent/godchild relationships, among others) that could potentially interfere with the employee’s objective, impartial, and transparent conduct when performing their duties and responsibilities at Austral.

The Affidavit will be filed in the employee’s personnel file. The Human Resources Management Department will monitor compliance with the requirement to submit the Affidavit. The Compliance Officer will present the results to the General Management and the responsible management areas in order to manage and mitigate the impact of such conflicts.

The purpose of this policy is to encourage transparency and integrity among all employees so that they may freely and promptly disclose any circumstances that may represent a real or potential conflict of interest. This ensures that, in the performance of their duties and responsibilities, employees avoid prioritizing their own interests or those of third parties over Austral’s interests. This policy does not seek to eliminate the occurrence of conflict-of-interest situations, but rather to establish the rules applicable to their reporting and management.

SITUATIONS THAT MAY GIVE RISE TO A CONFLICT OF INTEREST

Without limiting the scope of this list, the following are examples of situations that may create a conflict of interest:

- Being an owner, officer, or having direct or indirect interests in a company or person that does business, or intends to do business, with Austral or with its key suppliers, subcontractors, or customers.
- Obtaining a personal financial benefit or securing such benefit for any third party by taking advantage of the position or role the employee holds at Austral.
- Using Austral's assets, resources, or information to obtain personal benefits or competitive or economic advantages for family members, friends, or any third party.
- Performing other jobs, consulting engagements, or business activities during working hours or using Austral's information.
- Participate in making the decision to purchase and/or sell Austral's goods or services, or approve their proper implementation, when this process involves suppliers with whom the employee has, either directly or through third parties, any personal interests, or family, friendship or any other kind of relationship, which may affect their ability to make an objective decision.
- Participate in the selection of suppliers or customers, when this process involves potential suppliers or customers with whom the employee has, either directly or through third parties, any personal interests, or family, friendship or any other kind of relationship, which may affect their ability to make an objective decision.

Regardless of the Annual Affidavit that each employee must complete, all employees are required to immediately report to the Human Resources Management Department and the Compliance Officer any situation that may represent a conflict of interest. Similarly, any employee who has doubts about a potential conflict-of-interest situation must raise the matter with the Compliance Officer.

PROCUREMENT OF GOODS AND SERVICES

All procurement of goods and services is handled by the Logistics Area under the Administration and Finance Management, except for procurements made through the Petty Cash Fund, which are governed by the applicable internal procedures. The Logistics Area of the Administration and Finance Management will verify, in every goods and services procurement process, whether any supplier has declared a real or potential conflict of interest with any of the companies interested in participating in a purchasing process. If such a situation is identified, it must be reported to the Compliance Officer.

SPECIFIC PROHIBITIONS RELATED TO CONFLICTS OF INTEREST

- **SECOND JOBS:** All employees must consider the position they hold at Austral as their sole employment activity and may not perform any other work activity—whether as an employee or independently—during the working hours to which they are subject at Austral. Outside of working hours, an employee may engage in other activities, provided that such activities do not affect or interfere with the proper performance of their duties at Austral. However, employees are strictly prohibited from engaging in any activity that is similar to or competes with Austral's activities or business, or that places the employee in a permanent conflict-of-interest situation that limits or compromises their ability to fulfill or perform their responsibilities at Austral.
- **SUPERVISION:** An employee must not hire, supervise, or influence the terms, conditions of engagement, or performance evaluations of any person or company with whom they have a conflict of interest. Likewise, they must not supervise the execution or acceptance of goods or services provided by persons or companies related to such individuals and that are supplying goods or services to Austral, nor may they participate in the sale of goods or provision of services in a manner that affects or interferes with the proper performance of their duties at Austral.
- **USE OF ASSETS:** The use of Austral's assets for personal purposes is not permitted. All employees must act with integrity and responsibility, safeguarding the assets assigned to them for the performance of their duties.
- **GIFTS AND HOSPITALITY:** It is strictly prohibited to give or offer payments or inducements—including gifts or hospitality—to government officials, whether personally or on behalf of Austral, in order to obtain any improper benefit. In the private sector, it is likewise prohibited to give or receive gifts or hospitality, or to accept invitations, travel payments, or services intended to improperly influence the decision-making of the recipient.
Any invitation to attend courses or travel paid for by suppliers must first be approved by the appropriate management department and by the General Management.
- **CONFIDENTIAL OR INSIDE INFORMATION:** No employee may disclose or share any information regarding Austral that is not publicly available, in particular commercial or financial information, or any other information that could be used by competitors or by any person for their own benefit or that of third parties. In particular, all employees must refrain from any improper use or disclosure of Austral's Inside Information to which they may have access.

For the purposes of this Policy, Inside Information means any information relating to Austral, its business, or one or more securities issued by Austral that has not been disclosed to the market and which, by its nature, if made public, could influence the liquidity, price, or quotation of such securities. This also includes any confidential information referred to in the Securities Market Act, as well as information relating to acquisition or disposal transactions and information concerning public takeover bids.



- **PERSONAL DATA:** The use of personal data databases of employees, suppliers, or customers, as well as video surveillance recordings, for personal purposes, to obtain any benefit, or for purposes unrelated to the duties assigned to each employee at Austral, is not permitted. The use of sensitive information or personal data (such as names, national identification numbers, mobile phone numbers, bank account details, etc.), as well as video surveillance recordings, for personal purposes is prohibited. Such conduct constitutes an offense under the Personal Data Protection Act, Law No. 29733, and its Regulations, as well as Directive No. 01-2020-JUS/DGTAIPD on the processing of personal data through video surveillance systems.
- **FINANCIAL INTERESTS:** Employees must disclose, through the Affidavit, any investment they hold, directly or indirectly (through relationships of consanguinity, friendship, or affinity), in any company that competes with Austral or in any of its suppliers or customers, or in companies related thereto. The foregoing shall not apply to investments made through mutual funds.
- **AFFECTIVE RELATIONSHIPS** Two employees who maintain an affective relationship are not allowed to work in positions where there is a relationship of subordination or dependence between them. If two employees maintain an affective relationship without there being a situation of subordination or dependence, they must handle themselves with professionalism, without affecting their work performance or their objectivity in making the decisions relating to their position. Employees must report these situations to the Human Resources Management. Under these circumstances, Austral may transfer one of the employees involved to another area.

RESPONSIBILITY FOR NON-COMPLIANCE

Non-compliance with this Policy will result in the imposition of disciplinary measures on the responsible employees. The same actions will be taken if it is found that an Austral employee failed to submit the conflict-of-interest affidavit when required, falsely stated that they had no conflicts of interest with a given person, or knowingly withheld information that should have been reported. The severity of the sanction will depend on the seriousness of the violation, any recurrence, the legal impact, and the harm caused to operations, reputation, or other factors determined by Austral.

If an Austral employee identifies conduct that violates this Policy or believes that an undeclared conflict of interest may exist, they may report it through Austral's Integrity Channel: www.australcanaldeintegridad.com