

Investor Relations Policy

1 PURPOSE AND PRINCIPLE OF THE POLICY

The purpose of this Investor Relations Policy (the “IR Policy” or “Policy”) is to inform and guide on the responsibilities and expected conduct with respect to the relationship of **Atento S.A.** (“Atento” or the “Company”) with its investors, current or potential holders of the securities issued by the Company, their agents and services providers, such as ratings agencies, brokers, sell side analysts, and the media.

On a publicly-disseminated basis, **Atento** is committed to providing timely, orderly, consistent, and credible information to the investing public. It is imperative this is accomplished consistently for both positive and negative information and that all required and voluntary disclosures have a balanced view relative to the performance and prospects of **Atento** and its business.

This Policy must be observed by all **Atento** employees, officers, directors, and independent contractors, regardless if they are directly dealing with investors as their primary responsibility or not. This **Policy** should be read in conjunction with Atento’s Statement of Policy to Directors, Officers and Key Employees Concerning Securities Trading and Disclosure of Confidential Information.

Any person who believes that a violation of this **Policy** has taken place shall report such violation promptly to the Atento S.A. Whistleblowing Channel, on the website <http://www.whistleblowerchannelatento.com>.

2 MATERIAL INFORMATION

Atento must comply with the disclosure regimes applicable to foreign private issuers under the securities laws of the United States by virtue of its shares being listed on the New York Stock Exchange and all other laws and regulations established by exchanges in which the Company’s securities are listed.

Under the legal regime in the United States, information concerning Atento is considered to be material if its disclosure can affect the value of the securities issued by the Company or be considered by a reasonable investor as important in making a decision to buy or sell any securities issued by Atento.

In simpler terms, information is material if there is a substantial likelihood that a reasonable investor would want to know the information before making an investment decision or that such information would alter the investment decision-making process. Both positive and negative information can be material, as well as information that forecasts whether an event may or may not occur.

The determination of the materiality of information involves a judgement call on the likelihood that a reasonable investor would view the information as having significantly altered the total mix of publicly available information and, thus, altering the outcome of the investment decision process. To make this determination a person must have a command of what is in the public domain and what is relevant to the market at any given time.

Examples of material information include, but are not limited to:

- The Company’s financial performance and condition, especially quarterly and year-end financial statements and key financial metrics;
- The decision to create a significant reserve or take a write-off or other adjustment that would cause significant changes to the Company’s financial statements, financial performance or liquidity;
- Projections, strategic plans, or any other facts which might substantially affect Atento’s financial results, business or operations
- Any significant changes in near-term financial performance, including a change in the Company’s financial guidance;

- Major changes in corporate structure such as bankruptcy, reorganization, merger, acquisitions, dispositions, joint ventures or the sale of Company assets;
- Changes in capital investment plans or corporate objectives;
- Defaults on principal or interest payments, or a violation of a covenant relative to outstanding debt or preferred stock;
- Changes in capital structure including the public or private sale of additional equity securities of the Company, issuing new debt instruments, or significant changes in financing sources or the loss thereof;
- Stock splits, changes in Company dividend policies or amounts, or the establishment of a stock repurchase program for the securities issued by the Company;
- Changes in control of the Company, including a third party “take-over bid” for ownership of the Company;
- A change in or dispute with the Company’s independent auditors, or auditor notification that the Company may no longer rely on an audit report;
- Changes in a significant contract, sale, or order, or any other important development regarding customers, suppliers, or partners;
- Significant changes or developments in assets, services or products provided, including new services or product releases, product defects, or a significant development, invention, or discovery;
- Significant accidents, incidents or events that may impact the Company’s ability to offer or deliver services;
- Cybersecurity risks and incidents, including vulnerabilities and breaches;
- Significant changes in key personnel, including senior management or the board of directors of the Company;
- Actual or threatened significant litigation, either by the Company or against the Company, including major labor disputes or disputes with major contractors, suppliers, or partners;
- Actual or threatened significant litigation or an inquiry by a governmental or regulatory authority;
- Any positive or negative developments in outstanding significant litigation, or the resolution of such litigation; and
- Updates regarding any prior material disclosure that has materially changed.

3 DISCLOSURE OF MATERIAL NONPUBLIC INFORMATION

Atento’s Chief Financial Officer (“CFO”) holds the final responsibility for determining the materiality of information and deciding if and when it should be disclosed to the public.

The only persons authorized to speak on behalf of the Company to investors, securityholders, analysts, brokers, ratings agencies or the media are the Company’s Chief Executive Officer, CFO and IR and media professionals (“Designated Spokespersons”). Any Designated Spokesperson may designate others to speak on behalf of the Company and/or respond to specific inquiries when necessary, but it is essential that the Legal Department and IR be notified of any communications by designated individuals to ensure the Company’s compliance with applicable legal and regulatory requirements.

Material nonpublic information disclosure (written or oral) must always be done in accordance with the procedures established in this Policy to ensure the completeness and accuracy of information disseminated. In making a disclosure of information either as required under this **Policy** or which is disclosed on a discretionary basis, the following principles must be followed:

- (i) Disclosure must include any information the omission of which would make the rest of the disclosure misleading (half-truths are misleading).
- (ii) Unfavorable material nonpublic information must be disclosed as promptly and completely as favorable information.
- (iii) Material nonpublic information must not be disclosed to selected individuals (for example, in a discussion with an analyst or an investor). If previously undisclosed material information has been inadvertently disclosed to an analyst or any other person not bound by an express confidentiality obligation, such information must be broadly disclosed through a current report on Form 6-K or a press release or both immediately (no later than 24 hours after discovering the unintentional disclosure or at the opening of trading on the New York Stock Exchange, whichever is later).
- (iv) If Atento subsequently learns that earlier disclosure contained a material error, was inaccurate or otherwise incomplete, the information must be corrected immediately.

It is essential that the CFO and General Counsel be kept fully apprised of all pending potential material developments involving Atento in order to evaluate and discuss those events, and to determine the appropriateness and timing for public release of information.

3.1 Timing of Disclosure and Maintaining Confidentiality

It may be in Atento's legitimate interest not to immediately disclose some material information. That includes information that may, if disclosed too early, negatively impact the Company's negotiating position or its ability to complete a transaction. In such a case, Atento may delay the disclosure until the information is ready to be publicly disseminated. To do so, all the following conditions must be present:

- (i) Such disclosure would likely prejudice the legitimate interests of the Company; and
- (ii) Atento was able to ensure the confidentiality of such non-public material information, under the terms of applicable securities legislation.

If it is deemed that the information should temporarily remain confidential, the CFO will determine the process by which such confidential information will be controlled and shall implement "information blackouts".

If a director, officer, or employee discloses or discovers the disclosure of potentially material information to an outside party and is concerned that such disclosure may not have been in accordance with this **Policy**, such person must immediately notify the Investor Relations Department.

4 THE INVESTOR RELATIONS FUNCTION/ROLE

The Investor Relations function involves all procedures and activities performed by several parts of the organization, that are related to but not limited to:

- (i) Monitoring all of the Company's business, corporate developments, public announcements, investor discussions and communications activities, and ensuring that these are in compliance with this **Policy** regarding content and timing.
- (ii) Performing the actions needed for disclosure, as appropriate, of material information about Atento's current or prospective business, governance and financial performance, in a formal, transparent and timely manner, in compliance with all applicable securities laws and regulations;
- (iii) Communicating effectively and efficiently with current and potential investors in all securities that Atento has or may issue, establishing a long-term trust relationship with the investing public and helping them to reach informed investment decisions, and contributing to the fair appraisal of all such traded securities over time.

5 THE INVESTOR RELATIONS DEPARTMENT

The Investor Relations Department (“IR”) has primary responsibility for performing the Investor Relations function. This function will be performed with its own internal resources, the formal contribution of other areas from the Company and by outside service providers. The head of IR (the “Investor Relations Officer” or “IRO”) reports directly to the Chief Financial Officer (“CFO”).

All Atento employees or officers must observe Atento’s Code of Conduct when transmitting non-public material information, and before disclosure in the public domain, all information should be validated by the Investor Relations Department. Personnel directly involved with the IR function (the “IR professionals”) are held to an even higher standard, as they are Atento’s spokespersons and, as such, must be perceived by the investing public as credible and reputable sources of information. In addition to observing Atento’s Code of Conduct, IR professionals should behave ethically, responsibly, and with integrity, treating any and all interactions with investors in a transparent and equitable way.

6 IR RESPONSIBILITIES, TARGET AUDIENCE AND CONDUCT

IR has primary responsibility for compliance with all applicable laws and regulations pertaining to the issuance and listing of any and all securities issued by Atento, including, among others, common or preferred stocks, bonds, debentures, notes or any other instrument deemed adequate to finance the Company. The laws and regulations mentioned include, but are not limited to, the ones set forth by the Securities Exchange Commission (SEC) and any other applicable jurisdiction, as defined by Atento’s legal advisors.

In addition to compliance, IR has primary responsibility for effective communication with the diverse investing public, meeting the needs of different audiences, ensuring focused actions for each investor profile and providing exclusive and available service channels.

6.1 Target Audience

The investing public includes, among others, the following:

- Institutional investors, including investment funds, insurance companies, pension funds or other similar entities that manage funds in the name of individual investors or other institutional investors;
- Individual Investors are those that manage their own funds directly;
- Brokers, investment banks, rating agencies and research providers, that provide investment advice and recommendations for their clients; and
- Other aggregators of specific information related to governance, social or environmental aspects of the business.

6.2 IR Activities

Among the various activities that IR has primary responsibility for are the following:

- To promote the disclosure of the Company’s results and transmit material information to the investing public in accordance with this Policy, and applicable laws and regulations;
- To answer any questions and clearly communicate with the investing public on Atento’s financial performance, operations, strategies, perspectives and any other related issues;
- To monitor the performance of Atento’s publicly traded securities;
- To propose initiatives that may contribute to the creation of long-term value for the Company and stockholders; and
- To preserve Atento’s public reputation and credibility.

7 PROCEDURES

To properly execute the IR function as established by this Policy, the following procedures should be observed in dealing with specific situations regarding disclosure of material information:

7.1 Day-to-Day Communications

Communications in the ordinary course of business with customers, suppliers or strategic partners are not covered by this IR Policy. Inquiries from analysts and investors, however, must be forwarded to the IRO. Under no circumstances should any attempt be made to handle these inquiries without prior authorization from a Designated Spokesperson. Company personnel must receive approval by a Designated Spokesperson prior to accepting any speaking or audio-visual engagement. The Designated Spokesperson must approve the content of any such presentations prior to disclosure.

7.2 Analysts Reports and Financial Models

IR may, upon request, review drafts of research analysts' models or reports for factual, publicly available content. Any comments to such documents shall be limited to those portions of the model or report that constitute statements of historical fact or a factual description of the Company's business. Equal emphasis will be given to correcting erroneous positive or negative factual information.

Atento will not distribute analyst reports or models through any means to any person outside of the Company. Instead, the Company will post on the investor relations section of its website the names and firms of analysts who are currently covering the Company's equities.

Individuals may not take information or quotes from analyst reports for use as third party endorsements in documents for external purposes. Such use implies support for the information or quote and the conclusions of the report and is best avoided.

7.3 Disclosure of Quarterly Earnings Information

The quarterly earnings information shall be disclosed as set forth herein:

- Atento will prepare a news release containing a summary of the key results and events of the quarter and/or fiscal year, if applicable, management comments on the quarterly earnings results, and any material forward-looking statements that will be discussed during the quarterly conference call ("**earnings release**").
- The earnings release shall be submitted to the Securities Exchange Commission ("SEC") and any other exchange as required by law. Only after filing is confirmed will the earnings release be sent for public dissemination using an appropriate newswire service, posted on the company's IR website and then sent by email to all contacts registered in the company's mailing list.
- Assuming the foregoing provisions have been complied with, the contents of the quarterly earnings release may be freely discussed with the investing public, and the IR team will be available to clarify any questions.
- No individual may discuss any financial information, including earnings, with anyone outside of Atento, except in accordance with this policy.

7.4 Quarterly Earnings Conference Calls

Atento will conduct, on a quarterly basis, interactive conference calls to discuss the results of each quarter and annual results.

- The quarterly and annual results conference calls will be announced in advance via a news release containing all necessary information, such as notice of the date, time and connection instructions for the conference call and the date of the earnings announcement.



- The press release will be disseminated at least two weeks prior to the time of such call, being distributed to the wire services, posted on the Company's IR website and sent via e-mail to all contacts registered in the Company's distribution list.

In addition, Atento may conduct conference calls, with the presence of senior management and open to the general and investing public, to discuss any public material or non-material information that the Company may deem appropriate.

- The call will, whenever possible, be announced in advance via a news release issued through a widely-circulated news or wire service containing the relevant information to be discussed during the call;
- The news release will also contain all necessary information, such as notice of the date, time and connection instructions for the conference call.

In all cases, the conference calls will be:

- Broadcasted live via channels that allow wide and easy access to the public, including dial-in operated conference call and webcasting, available on the Company's website;
- Atento will also make available on its IR website for at least one year any prepared materials used or presented during the call, including the recording of the webcast;

With respect to the conference calls, the following steps will be taken:

- At the beginning of all conference calls, Atento will provide appropriate cautionary language respecting any forward-looking information, will direct participants to available documents containing the assumptions, sensitivities, risks, and uncertainties, and will make clear the date of the call so that it is unmistakable to listeners that it is archived material;
- Atento will conspicuously include on its archive site in writing the appropriate cautionary language respecting any forward-looking information;
- No non-public material information concerning the finances or prospects of Atento will be disclosed during a conference call, in response to questioning or otherwise, before it has been disclosed in accordance with this **Policy**. If material information is to be announced at a conference call or a press conference, its announcement must be made in accordance with this Policy before the conference call is initiated.

7.5 Earnings Guidance/ Forward-Looking Information

Atento may also provide specific forward-looking information for certain operational and financial figures ("**financial guidance**"), and update this information, whenever necessary. **Financial guidance** is deemed to be material, and must be publicly disclosed, in accordance with this **Policy**.

Atento may also provide specific forward-looking non-financial information related to product development and market opportunities for its products, make statements and respond to inquiries with respect to product development and projected demand or market potential for its products or services. This information should enable the investing community to better evaluate Atento and its prospects. Should any such forward-looking information be deemed to be material, the information will be publicly disclosed, in accordance with this **Policy**.

In any case, any disclosure of forward-looking information must observe the following procedures:

- **Financial guidance** and its updates will be announced preferably in the Quarterly Earnings materials. If guidance must be updated in a different document, it will be disclosed and published as broadly as would be an earnings release.
- The provided **financial guidance** will be based on the company's internal projections and on key assumptions that must have met reasonable basis standards. IR professionals can discuss **financial guidance** with investors so as to clarify the assumptions and the methodology used to calculate projected numbers. As for the projected figures, IR professionals must always refer to the last **financial**

guidance given or reaffirmed, reiterating that the estimates were accurate as of the date they were given.

- Nor Atento nor any other person representing Atento, besides IR professionals, will comment, discuss, provide comfort, or “walk the street” up or down on financial projections about the Company made by others, including the consensus earnings estimates published by investment analysts.
- Any forward-looking statement, whether written or oral, concerning operational or financial performance will be identified as such and accompanied by meaningful cautionary statements identifying important factors, risks and assumptions that were employed and a reminder that actual results could differ materially from those statements (“Safe Harbor language”).

7.6 Quiet Period

Atento’s personnel in general, and IR professionals in particular, will not comment on financial results or earnings guidance during a period that starts 15 days prior to the announcement of the quarterly financial results and ends the day the earnings are announced (the “quiet period”), minimizing the risks of selective or involuntary disclosure of material non-public financial information.

- During the Quiet Period, Atento’s Designated Spokespersons and any other person communicating with the financial community or the media may only disclose non-material or public material information.
- During the Quiet Period, Atento’s officers and IR professionals should avoid participating in investment conferences, group and one-on-one meetings, telephone calls or any other public event where investors or investment analysts are present. If such participation occurs, IR professionals may only discuss factual public information and no reference will be made to financial results and guidance.

7.7 Investor and Analyst Meetings and Conferences

As an integral part of the IR function, Atento’s officers and IR professionals strive to maximize investors’ awareness of our business environment and management strategies by participating in investment conferences, segment- specific briefings, site tours, roadshows, and other opportunities for communication. In doing so, they will meet with investors, investment analysts, investment bankers and other members of the investing public to provide factual public material and non-material information, to explain strategies or to discuss qualitative information that is not of a material nature. These meetings can be with individuals or groups of investors, and can be arranged by the investors, their brokers, service providers or by Atento.

- IR will create and maintain a calendar in its IR website with information on the main events it plans to attend, including the material it will be using in such event.
- In any case, when participating in these events, Atento representatives must be diligent to avoid disclosure of any material non-public information, either in the prepared remarks or when answering questions from the audience.

7.8 Market Rumors and Leaks of Material Information

IR will monitor market rumors about the Company. Provided it is clear that Atento is not the source of the market rumor, Atento will not comment on rumors and IR professionals should reiterate, if questioned about specific rumors, that the Company does not comment on market rumors or speculation.

Should an exchange that the Company trades its securities upon (e.g. the New York Stock Exchange) request a definitive statement from Atento, the determination to do so and the content of the statement will be determined by the CFO. Any such statement will be issued in accordance with the news release dissemination procedures set out in this **Policy**.

In the event that material non-public information is inadvertently disclosed or if rumors or unusual market activity indicate that material information about pending developments has been selectively leaked, the IR department must prepare an appropriate public announcement of such material information that should be disclosed to the public as soon as possible, in accordance with the news release dissemination procedures set out in this **Policy**.

7.9 Press Releases

New developments in material information will be immediately and broadly disclosed, using the usual means established by the Policy, including press releases, filings with regulatory authorities and exchanges, publishing on Atento's website, and any other means judged by the IR department to be adequate to guarantee full and equitable disclosure.

- Atento's Senior Management may decide that it is in the best interest of the Company that such developments or material information remain confidential for disclosure at a later moment. If that is the case, all persons that, in the normal performance of their professional obligations, must have access to the non-public material information, must be explicitly informed of their duty to preserve the confidentiality of said information.
- All press releases, including all those distributed by subsidiaries and any joint ventures, should, at a minimum, be approved by the IRO, CFO or CEO. This obligation includes "non-financial" or "non-material," marketing, human resources or any other operational subject.

7.10 Information on the Website

All requests for publicly available material financial and operational information from any interested party, including the investing public and media, should be referred to the Investor Relations Department.

Corporate information, including annual and quarterly reports as well as information deemed material to the Company's financial stakeholders will appear on the "Investor Relations" section on Atento's website, which shall be accessible without any password. All public material information must be added to the website as soon as practicable after filed with the regulatory authorities and the exchanges and disseminated through a recognized wire service.

IR is responsible for assuring that all information published on the website is updated and continually reviewed to ensure that the information it contains is up-to-date, accurate, and complete. Information passed thereon will be accessible for at least five years, in an easily traceable fashion. The news release page of the website shall include a notice that advises the reader that the information posted was accurate at the time of posting but may be superseded by subsequent news releases.

Atento will also make available on its IR website:

- Audio recordings and/or transcripts of earnings calls as soon as possible after they occur, to the extent that such earnings calls contain material information of a precise nature that has not otherwise been made public;
- All supplementary non-material information of interest to the investing public and other parties. If the volume of such information makes this impractical, Atento will describe the information on its internet website and provide contact information whereby the interested party may contact Atento to obtain a copy of the information or review the information with Atento's IR professionals.

7.11 Monitor Trading

The trading activity of Company stock will be generally monitored by management for unusual trading activity. Unusual trading volume or price swings may indicate the inadvertent disclosure of material information that may need to be remedied by a press release. Trading activity by insiders is also subject to the Company's Statement of Policy to Directors, Officers and Key Employees Concerning Securities Trading and Disclosure of Confidential Information.

7.12 Media Policy

The media's importance in communicating information and building the Company's reputation cannot be underestimated. At the same time, premature release of information to the media, or discussions that stray from the Company's message can result in misinformation, rumors and confusion in the marketplace. The resulting news stories could have serious consequences for the Company's image, its position in the financial markets, and a harmful impact on the price of the Company's securities and the Company's credibility.



For this reason, no individual, other than a Designated Spokesperson, shall speak with any media outlet or reporter, including print, broadcast, wire service and online, about any aspect of Atento's business and operations.

All media requests and questions should be directed to the **media relations department**, who will coordinate all media activity for the entire Company, review and determine appropriate responses and spokespersons for each situation, including requests made to the Company's subsidiaries.

7.13 Social Media

Atento recognizes that employees may wish to participate in online discussion forums, blogs, social networking and other similar sites for personal and professional development. It is important to note that communications made by or on behalf of the Company in these forums are subject to securities law rules and regulations.

Unless specifically authorized by the Company, the Company prohibits all employees from discussing business information that belongs to the Company in these forums. Employees must know that unless they are a Designated Spokesperson, their discussion of material nonpublic information regarding Company's business and financial condition in any of these forums may compromise sensitive Company information, have a detrimental impact on the Company, and could be considered selective disclosure in violation of securities laws.

In case an employee or any person subject to this Policy discloses material or business information without being duly authorized by a Spokesperson, the Company shall be entitled to impose disciplinary sanctions, which may include, but are not limited to, termination of employment.

8 Headquarters and/or Facilities Visits

The Company may conduct visits to its headquarters and or tours of its facilities for analysts and/or investors, but must take care to avoid opportunities for visitors to gain material nonpublic information in the process. A Designated Spokesperson, whenever practical, should be present during any such visits or tours.

9 Additional Information

Should you have any questions regarding this **Policy**, securities laws and regulations, and any questions regarding disclosure of information or dealing with the investing public, please do not hesitate to contact the IR department.

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