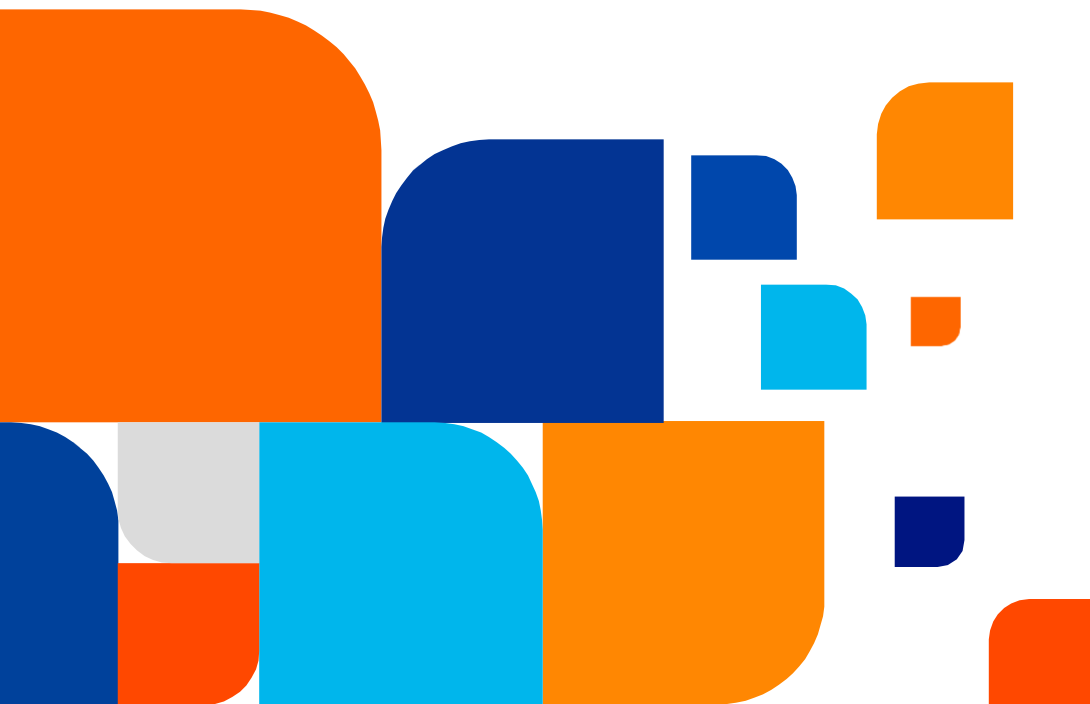


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# Code of Ethics and Conduct





# Code of Ethics and Conduct



## Summary

This code aims to guide employee actions, which must always uphold and apply the laws and best practices that pertain to their duties in accordance with Itaú ethics and culture.

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# Policy

## A word from senior management

**Itubers,**

Throughout its history, our brand has always been guided by a non-negotiable value: **ethics**. The principles of integrity and ethics must guide our decisions and behaviors in all our relationships, from everyday attitudes to the most strategic, long-term perspectives.

We believe that true success lies in a company's ability to lead in a consistently ethical, upright and responsible manner. We are proud that **ethics are an essential part of our Ituber Culture**.

**The Itaú Chile Code of Ethics and Conduct** supports our conviction that long-standing organizations never pursue profit at any cost. Like us, they strive to turn every service into an opportunity to create value.

**This code was drafted to guide all our employees, suppliers and the company on how to act in accordance with Itaú values.** It should always be consulted regardless of the role, area or country.

The code has four strategic pillars: our corporate identity, our relationships, our ethics and professional attitude, and how we manage conflicts of interest. Both educational and disciplinary in nature, the code reinforces the importance of ethics in everything we do and guides us on its application in our daily lives and relationships. **More than just a standard, the code should be seen as an inspiration and a natural part of our work that broadens, rather than limits, horizons.**

Building an increasingly robust company that will endure over time and be a source of pride for us all requires everyone's commitment to the values we cultivate.


We are counting on you to make Itaú Chile tireless in its quest for sustainable results, focused on leaving a positive legacy wherever it operates and creating increasingly greater value for customers and society.

**Gabriel Moura**  
Chief Executive Officer, Itaú Chile

## 1. Our corporate identity

As an organization and in all the countries where we operate, we focus on customer satisfaction, growth and efficiency based on ethical business conduct, transparency and sustainable development.

Like every individual whose personality traits differentiate them from others, every long-lasting institution has a corporate identity that makes it unique.



Itaú Chile **prides itself on acting with integrity and ethics.**

We strive to establish lasting, permanent connections with our stakeholders. We value customer satisfaction, evaluate the societal impact of our activities, act with transparency and integrity, and adopt practices that create shared value.

These characteristics of Itaú Chile are embedded in our organizational culture and the guidelines and practices described below.

### Corporate governance

Our corporate governance objectives include creating efficient incentives and monitoring mechanisms to prevent inappropriate conduct and undue favors for Itaú Chile or related third parties, thus promoting ethically-guided decision-making. Our different policies on risk management, audit, AML & Compliance, internal control and corporate governance make the guidelines more robust by aligning our companies' activities, business and operations with Itaú vision, culture, the principles established herein and stakeholder needs.

## Sustainability



Business and sustainability go hand in hand.  
**This is nothing new to us.**

**Our ESG (Environmental, Social and Governance) strategy** reflects the maturity of our governance structures and processes, which enable us to incorporate social, environmental and climate factors and trends into our activities and processes.


We are firmly committed to addressing today's major challenges while ensuring transparency and efficiency in our business dealings and impact. One such public commitment is to **promote an honest environment and an ethical and financial ecosystem aligned with the sustainable development agenda.**

To learn more about our sustainability performance, please see our sustainability guidelines and visit our sustainability website: **[Click here.](#)**

## Laws, standards and regulations

**We comply with the laws, rules and regulations in force in the countries where we operate. We strive to report and respond rigorously, clearly and promptly to regulatory agencies.** We have policies and practices to prevent and combat all forms of corruption (e.g., bribery, influence peddling, undue favors), money laundering, terrorism financing, fraud and other illegal acts.

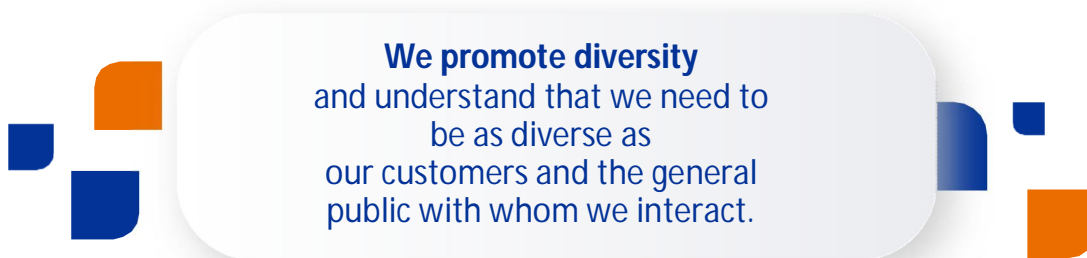
We abide by the ethical and self-regulation guidelines of the business associations to which we belong.



**We encourage our employees to understand that laws, standards and regulations cannot address all the ethical implications of every situation.**

Thus, we encourage reflection on how our actions influence stakeholders, society and the environment from an ethical perspective beyond mere compliance with the law.

## Work relationships



Our operations foster an environment open to different viewpoints. We encourage employees to express themselves honestly and authentically and to consistently contribute to an organizational climate of respect, trust and continuous learning.

We promote and respect human rights as well as laws that support diversity, inclusion and equity. Furthermore, our policies and practices promote these issues and aim to prevent and combat any discrimination, harassment, prejudice or degrading working conditions.

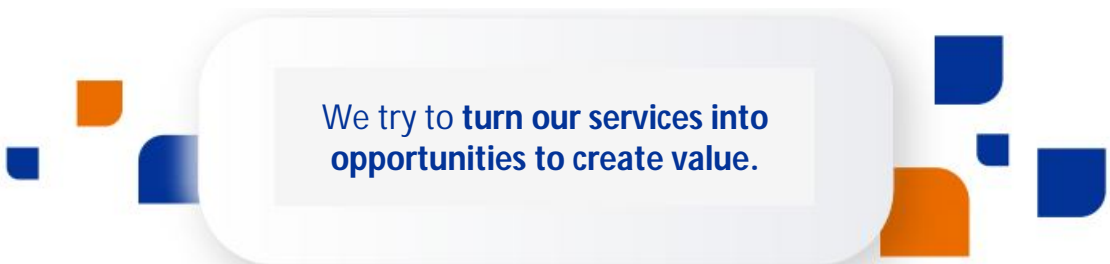
Itaú Chile provides equal opportunities for job access, professional advancement and growth through development and training. To that end, we:

- Remunerate, promote and recognize employees based on meritocratic criteria.
- Promote and offer professional development and occupational health and safety training programs.
- Guarantee rights to collective bargaining and freedom of political, religious and trade union association.

## 2. Our relationships

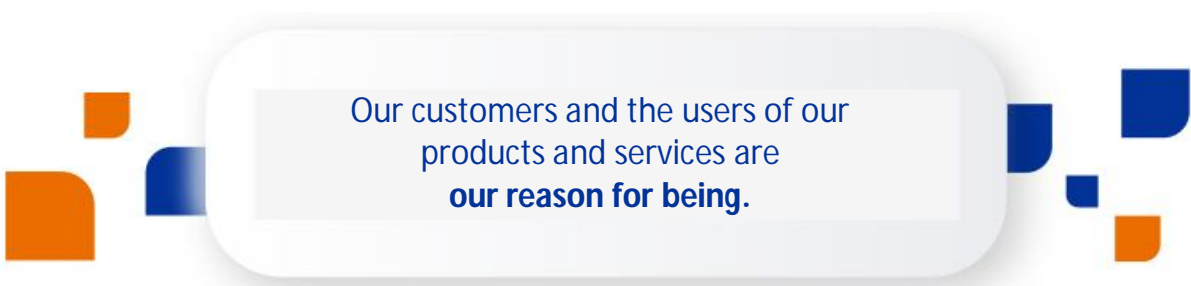
We interact daily with different counterparts, including customers and users, shareholders and investors, suppliers, competitors, the public sector, the media, employees and society in general. In these interactions, we strive for values and actions that favor the common good and sustainable development.

We believe shared value benefits all parties and helps build long-term relationships. Consequently, we foster dialog and cooperation with our counterparts, seek to harmonize their interests and ours, consider their suggestions and criticisms to improve our performance, answer their questions promptly and accurately and continuously improve our products and services.



We try to **turn our services into opportunities to create value.**

### Customers and users



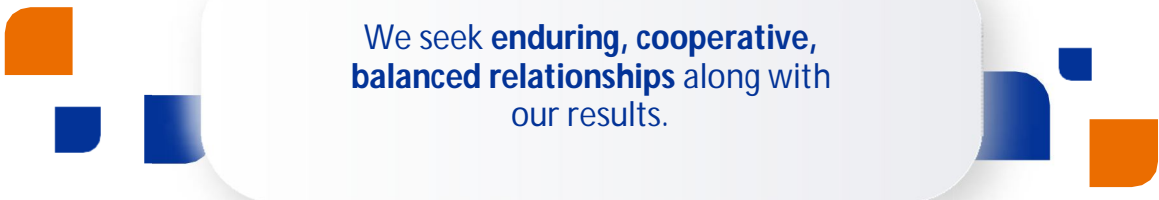
Our customers and the users of our products and services are **our reason for being.**

We responsibly, transparently and diligently aim to meet their needs and exceed their expectations. We seek enduring, cooperative and balanced relationships that ultimately converge interests. To achieve this, we need to provide the best experience to our customers and all users of our services.

**We place customers and service users at the heart of our operations to identify and meet their expectations and needs while constantly improving our actions.**

That is how we operate in the banking and financial services market.





We seek **enduring, cooperative, balanced relationships** along with our results.

#### Examples of expected conduct

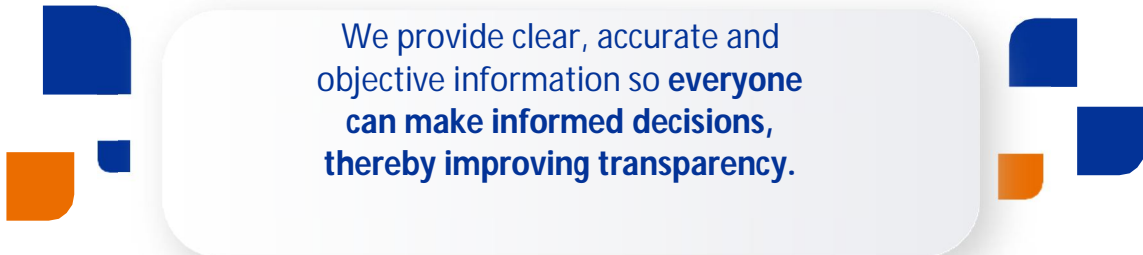
- Respect our customers' freedom of choice by providing them with all available information in a clear, accurate and timely manner so that they can make informed decisions.
- Value our customers' diversity and vulnerabilities by paying special attention to providing products and services suited to their different profiles and goals.
- Make available to our customers secure service channels that can receive and promptly address their requests, complaints and suggestions. These channels must offer customers and users fair and equitable treatment in the resolution of their issue.

#### Examples of unacceptable conduct

- Offering products that are ill-suited to the customer or user profile or needs, misleading them, omitting relevant information, conditioning doing business on tied product sales or other forms of coercion
- Finalizing product or service sales without the required agreement or contract formalization from the customer
- Spreading information, advising or negotiating based on rumors, unreliable data or data that is not authorized under the law
- Discriminating, excluding or restricting customers based on gender, culture or ethnicity, race or skin color, social status, religion, beliefs, age, marital status, sexual orientation, gender identity, family status, nationality, political or philosophical beliefs, genetic or health conditions, physical attributes, disability or for any other reason. For more information, please refer to the Diversity and Inclusion Policy.

#### Shareholders and investors

Itaú Chile safeguards the interests of our shareholders and investors.



We provide clear, accurate and objective information so **everyone can make informed decisions, thereby improving transparency.**

### Examples of expected conduct

- Prepare financial statements and regulatory reports that clearly and accurately translate the relevant information, enabling the best decision-making.
- Exercise transparent, objective and impartial corporate governance. Monitor and mitigate potential conflicts of interest between shareholders, management and Itaú Chile.
- Abide by the laws, corporate policies and standards that regulate the securities market and Itaú Chile information disclosure.
- Prevent insider trading and leaks of confidential and/or restricted information.
- Provide clear, accurate and objective information so everyone can make informed decisions, thereby improving transparency.

### Examples of unacceptable conduct

- Conducting business or operations that exclusively serve the interests of the executives and directors to the detriment of the bank's interests
- Using insider information to buy or sell financial assets (shares, debentures, etc.) directly or through third parties
- Leaking or unfairly furnishing any non-public information that could influence investors' decision-making. For more information, see the Diversity and Inclusion Policy.

## Suppliers

Organizations like Itaú Chile form a value chain with their goods and services suppliers and their commercial and business partners.

### Examples of expected conduct


- Apply objective, transparent, honest and impartial criteria when selecting and hiring new suppliers, service providers and business partners. Value ethics in our relationships without showing favoritism of any kind.
- Support sustainable supplier development, promotion of decent work, fair competition and compliance with legal requirements and Itaú Chile's policies. Place special emphasis on combating illicit or criminal acts (e.g., corruption, influence peddling, fraud, money laundering and smuggling)

### Examples of unacceptable conduct

- Tolerating any human rights violations, degrading work (e.g., child labor or forced labor), hazardous working conditions or physical or psychological mistreatment on the part of suppliers. Likewise, purchasing from suppliers that do not respect their workers' dignity is unacceptable.
- Forming business or personal relationships with suppliers or partners that could influence decision-making and compromise our impartiality.
- Sharing strategic information that may compromise transparency and impartiality in tendering processes.

Please see our Internal Regulations on Purchasing and Supplier Payment to learn more about this topic.

### Competitors



Competition is crucial to our customers' and users' ability to exercise their freedom of choice.

We must combat three types of anti-competitive conduct:

- Unfair competition: obtaining a competitive advantage via unethical or illegal means (e.g., making false statements about competitors or not respecting third-party intellectual property rights).
- Cartel formation, which reduces competition and directly harms society in general.
- Unilateral business practices that harm or could harm competitive market dynamics, particularly where we hold significant market share.

### Examples of expected conduct

- Act in accordance with the principles of free competition. Respect our competitors' reputations and opinions as well as third-party intellectual property.
- Demonstrate a spirit of cooperation by joining business associations whose sole objective is to improve the economic sectors where we operate.

### Examples of unacceptable conduct

- Promoting or performing any act of economic espionage or using dubious or illegal means to access competitors' plans and actions
- Making comments that could affect our competitors' image or spreading rumors about them
- Providing our competitors with strategic information about our business, e.g., plans, competitive advantages, pricing policies, contract terms, costs, market surveys, accounting and management results or new product, service and technology developments.

### Public sector and government relationships

Relationships and contacts with any public sector entity or official, regardless of the institution, position or rank involved, require ethics, impartiality, independence, transparency and strict accountability on our part, in addition to respect for the rules of public administration, applicable laws and regulations.



Relationships and contacts with public sector entities or official or require ethics, impartiality, independence, transparency and strict accountability.

### Examples of expected conduct

- Keep corporate decisions free of partisan preferences and influences, whether political or ideological. Respect the opinions and political participation of managers and employees when expressed on a strictly personal basis.
- Actively exercise corporate citizenship by limiting partnerships and contributions (sponsorships, donations, etc.) to those that benefit the community and aim to improve society.
- Respect expression of opinions and political participation that is strictly personal and does not explicitly represent Itaú Chile's position or constitute veiled institutional support.

### Examples of unacceptable conduct

- Taking advantage of a position to offer or receive any undue advantages (economic or otherwise) or contributing to the misappropriation of public resources.
- Receiving money, gifts or favors from public employees, public officials, holders of public positions or members of political parties for any reason whatsoever. Likewise, offering any person any courtesy meant to influence decisions or facilitate business outside marketing or relationship campaigns is prohibited. Such practices

constitute forms of corruption and criminal offenses.

- Showing any corporate preference regarding actions or statements by government officials or making political comments that could compromise our business relationships.
- Making contributions, directly or indirectly, through any Itaú Chile company to electoral campaigns, candidates running for public office or political parties.
- Making occasional contributions (sponsorships, donations, etc.) conditional upon obtaining undue advantages of any kind for Itaú Chile, the individual or third parties.

To learn more about this topic, please refer to our Corruption Prevention Policy, Internal Regulations on Donations and Internal Regulations on Law No. 20,393.

### Non-profit organizations


This sector comprises non-profit, non-governmental organizations like associations, foundations or community organizations whose primary objective is to provide public services. Our relationship with the non-profit sector aims to create a more equitable society in terms of opportunities.

#### Examples of expected conduct

- Form alliances to promote sustainable societal development within the limits of the local legislative framework and in keeping with corporate guidelines.
- Allocate sponsorships and donations to the social, economic, educational, cultural and environmental development of the communities with which we interact.
- Support and stimulate the social initiatives Itaú Chile already carries out through its institutes and foundations.

#### Examples of unacceptable conduct

- Forming alliances with and making contributions (sponsorships, donations, etc.) to NGOs based on personal relationships or policies not aligned with legislation and corporate guidelines.
- Making social investments solely to make business deals viable or making those investments conditional upon the beneficiary organization purchasing Itaú Chile products or services. To learn more about this topic, please see our Internal Regulations on Donations.



Itaú Chile's relationship with non-profit organizations contributes to **creating a more equitable society in terms of opportunities.**

### Communication media

Public interests and a plurality of opinions are essential to strengthening democracy in Chile.

Examples of expected conduct

- Engage in media relationships with the clear intention of informing public opinion. Keep comments truthful and independent.
- Seek guidance from the Corporate Legal Division's Corporate Affairs Department before participating in any interviews and press programs related to Itaú Chile's activities.

Examples of unacceptable conduct

- Disclosing any information about Itaú Chile or its employees in personal conversations, via telephone, email or social media to share news that could endanger our image or reputation. Only authorized persons may represent the organization before the media and/or judicial authorities.

### Communities



As a financial institution, we **recognize our role as an agent of transformation and promoting local development.**

We serve the communities where we operate, expanding access to financial services and considering social, economic and environmental factors as we target our social investment.

### Examples of expected conduct

- Actively foster ethics and transparency in the institutions and individuals with whose projects we interact.
- Participate in public policy debates regarding the population's needs in order to support initiatives with high social impact and potential for scale.
- Participate in debates, events and initiatives that improve and strengthen society.
- Speak to communities on behalf of Itaú Chile or its companies, by any means available and only with prior authorization.

### Examples of unacceptable conduct

- Neglecting or hindering local development, failing to exercise our role as an agent of transformation.

### 3. Our ethics and professional attitude

**We act in good faith and take responsibility for our actions and choices.**

We must give others the fair treatment they expect, be accountable for our actions and choices, demonstrate good faith and honesty of purpose, and create an environment of trust.

To stand out in a highly competitive market, our services must meet superior quality standards contingent upon ethical work relationships, continuous improvement and its supporting processes and a motivating, mutually respectful, mostly cooperative environment. Regarding safety standards, appropriate employee conduct is established in the Internal Regulations on Order, Hygiene and Safety, which must be upheld per the provisions of article 67 of Law No. 16,744.

Given the breadth of the matter, should any questions arise, we must consult the appropriate Itaú Chile communication channels listed at the end of this document.

**To stand out in a highly competitive market, our services must meet superior quality standards.**



### Examples of expected conduct

- Exercise mutual trust, providing autonomy to individuals and work teams. Foster and nurture an environment where everyone is recognized for their uniqueness and contributions.
- Uphold labor regulations and collective bargaining agreements. Avoid excesses, impositions and unnecessary restrictions.
- Share information that will aid others in their roles and decisions.
- Know, assess and understand all types of risks (e.g., credit, market, liquidity, operational and reputation) that may impact our business, customers and/or other stakeholders. We take risks consciously, acting on them, discussing and managing them efficiently and responsibly, and respecting our ethical and business principles.
- Take good care of the available facilities, resources, equipment, machines and other work materials. Use them for personal reasons only in case of emergency and with extreme moderation.
- Use the corporate credit card and other benefits responsibly. This applies to health and dental plans, banking products and services, parking and recreational clubs, which should be used according to corporate standards and a reasonable standard of collaboration.
- Itaú respects the right to freedom of political, religious and union association. It upholds conventions and collective bargaining agreements and observes labor rights and responsibilities.
- Follow conscious consumption guidelines and do not waste resources like water, energy, paper, disposable goods, office supplies or fuel. Make an effort to protect the environment and recycle everything possible.
- Refrain from holding raffles, drawings, prize games or any other game of chance.
- Notify your supervisor of any intention to run for public office. Candidacy would require resignation from Itaú as it is contrary to our political neutrality as well as the exclusivity employees have agreed to in their Itaú employment contracts.
- Exercise prudent and responsible management of personal and family businesses, using economic resources consciously.

### Examples of unacceptable conduct

- Using the Itaú Chile name or their position and consequent influence to obtain undue benefits or advantages of any kind for themselves or third parties.
- Discriminating or tolerating discrimination against any person, regardless of gender, culture or ethnicity, race or skin color, social status, religion, belief, age, marital status, sexual orientation, gender identity, family status, nationality, political or philosophical convictions, genetic or health conditions, permanent or temporary physical attributes, disability or, for any other reason constituting an act of intolerance and harm to personal dignity. For additional information, please refer to the Diversity and Inclusion Policy.

- Engaging in or tolerating workplace and sexual harassment. Such conduct damages the targets' personal integrity and leads to legal consequences that harm the work environment. Any employee who is a victim of conduct that the law or internal regulations define as harassment has the right to report it through established institutional or legal channels.
- Sanctioning or retaliating against anyone who, in good faith, reports any violation of this code or other corporate policies through the appropriate channels.
- Buying or selling goods or services from/to management or employees on Itaú Chile premises or via corporate electronic channels for personal or third-party economic gain.
- Failing to comply with internal safety procedures or engaging in or tolerating deals or operations that could contribute to an illicit or criminal act (including transnational ones). Examples include corruption, money laundering and/or terrorism financing, fraud, violating legal provisions and exposing Itaú Chile to serious sanctions. Please refer to our Corporate Corruption Prevention Policy to learn more about this topic.
- Employees are prohibited from reporting to work under the influence of alcohol, drugs or narcotics or possessing alcoholic beverages or hallucinogenic drugs on Itaú premises. Furthermore, they are prohibited from selling, consuming or providing such items for consumption in situations or activities that are part of their professional duties at Itaú. Exceptions to the prohibition on alcohol consumption on Itaú premises or at Itaú events require authorization or express instruction from the People and Sustainability Management Division. Exceptions must also align with the Internal Regulations on Order, Health and Safety.

## 4. How we manage conflicts of interest

All employees shall always act in such a way that their personal interests, those of their family members or other persons related to them, do not take precedence over the interest of Itaú Chile or its customers. Any doubt or indication that this is not the case must be reported to the employee's supervisor and the AML & Compliance Division, which shall act independently and secretly to assess the case and provide appropriate guidance.

Any conflict of interest could compromise our judgment and the impartiality of our actions, posing risks for Itaú Chile, its managers and employees.

Conflicts of interest can take many shapes, including kinship or close relationships, ties with a supplier or service provider, ownership interest in associations that receive benefits from Itaú Chile companies, ownership interest in competitors or companies with potentially competing activities, ownership interest in partner companies and offering or receiving courtesies.

At Itaú Chile, all questions are valid regardless of complexity or the employee's position, duties or rank. All queries and questions are analyzed independently in light of the law, policies and procedures.

### Handling information

We handle information, knowledge and intellectual property on behalf of Itaú Chile and, where appropriate, under established privacy and confidentiality standards, on behalf of our stakeholders.

The way we use available information and know-how (e.g., knowledge, techniques, technologies, methods, systems, software) can positively or negatively impact the business and the reputation of individuals and the organization.

Itaú Chile expects its employees to protect electronic equipment and data against intentional malicious acts by persons inside or outside the company.

### Examples of expected conduct

- Diligently use cyber and information security mechanisms to ensure confidentiality and prevent data and information leaks.
- Respect the privacy of customers, suppliers and other stakeholders with whom we interact or obtain information. Keep their records, information, operations and contracted services confidential so as not to jeopardize the trust we have earned.
- Request permission from the corresponding corporate manager before using non-public information or knowledge in external activities or publications (classes, conferences, seminars, academic papers, books, journals and other social media (e.g., networks, podcasts, video or photo exchange, blogs). Disclosure or adulteration of such information could potentially lead to economic loss, favor competitors or adversely affect Itaú Chile's business or image.

### Examples of unacceptable conduct

- Appropriating non-public information about Itaú Chile or third parties for private purposes or sharing it with third parties without prior authorization from the information owner, even in violation of internal and external regulations. Such conduct could be detrimental to Itaú Chile and its related parties.
- Carrying copies of information, processes, methodologies, software, or other data. These are the intellectual property of Itaú Chile, even if the manager or employee developed them at work.
- Spreading rumors or damaging the image of managers, employees, the institution or its stakeholders.

To learn more about this topic, please refer to the Corporate Fraud Prevention and Cybersecurity Policy.

### **Kinship and marriage relationships**

Hiring family members, spouses or close relatives is allowed. However, the Corporate People and Sustainability Division, the AML and Compliance Division and the Division where the position is housed must determine whether any conflict of interest exists.

Relatives include but are not limited to spouses or domestic partners, ascendants (e.g., parents and grandparents), descendants (e.g., children and grandchildren, related by blood or adoption), collateral relatives (e.g., siblings, aunts, uncles, nieces, nephews and cousins) or by marriage (e.g., stepparents, parents-in-law, brothers-in-law, sisters-in-law, stepchildren, sons-in-law and daughters-in-law).

### Examples of expected conduct

- Report to the direct supervisor/manager and the hiring manager (internal or external) if you wish to recommend or hire a family member or a person with whom you have a close relationship. When transferring employees or merging areas, take the same precautions to check for any impediments.
- Should any questions arise regarding a potential conflict of interest, we must consult the appropriate Itaú Chile communication channels listed at the end of this document.

### Examples of unacceptable conduct

- Tolerating conflicts of interest or favoritism derived from kinship or close relationships with managers or employees
- Employing individuals with kinship or close relationships in the same area or similar physical location (e.g., the same platform).

### Activities and ownership interest in companies

The ties executives and employees hold to other companies, activities or persons could allow for favoritism, which can tarnish images or damage reputations.

This includes personal relationships with customers, suppliers and business partners.

### Examples of expected conduct

- Inform your direct supervisor/manager if you intend to create or join another company or begin working at any other organization. Contact the AML and Compliance Division if unsure whether the activity conflicts with your duties or Itaú Chile operations.
- Consult the AML and Compliance Division to evaluate any potential conflicts of interest before hiring or maintaining a relationship with suppliers, service providers or business partners at which you have a relationship with executives or employees (e.g., kinship or ownership interest in the company).

### Examples of unacceptable conduct

- Conducting, without prior approval from the AML and Compliance Division or in violation of corporate guidelines, private business or partnerships with professionals or companies that are Itaú Chile customers, suppliers, business partners, competitors, or are related to Itaú Chile in any way, when the interaction could give rise to a conflict of interest.
- Self-employment or working at other organizations as a manager, employee, service provider, consultant or advisor, partner, managing partner or equity partner, technical director, etc., when such employment conflicts in any way, due to its nature or the time dedicated to them, with the employee's duties at Itaú Chile. Any such situation will be evaluated by the AML and Compliance Division and submitted to the Ethics and Compliance Committee for resolution.

### Gifts and invitations

Itaú Chile is committed to excellence and the highest service standards. Consequently, we must always provide quality service to our customers and/or suppliers without expecting anything in return beyond that to which Itaú has agreed.

Examples of inappropriate incentives include invitations to meals, gifts, rewards, prizes, discounts on personal transactions, business or leisure trips, tickets to sporting events, concerts, cultural events and favors of any kind.

These benefits, offered with the justification of creating affinities between the parties or strengthening working relationships, can easily be mistaken for artifices intended to circumvent the rules or can be interpreted as illicit means of facilitating business.

### Examples of expected conduct

- Prohibit the receipt or offer of benefits and rewards that, directly or indirectly, could give rise to ties or commitments detrimental to fair business unless such actions fall within limits established in corporate regulations.
- Only make contributions on behalf of Itaú Chile (sponsorships or donations) aligned with corporate regulations.

### Examples of unacceptable conduct

- Suggesting, offering, granting, promising, receiving or accepting any services, payments, gifts, contributions and favors to/from any third party in exchange for or to facilitate Itaú Chile business, operations or initiatives or in pursuit of undue advantages for the individual or a third party.
- Violating the Itaú Employee Gifts and Invitations Policy.
- Failing to comply with the Policy on Gifts and Invitations to Customers or Third Parties.

## 5. Use, management and scope of the Code of Ethics and Conduct

When faced with a question or dilemma regarding a Code of Ethics and Conduct issue, answer the following questions. You are on the right track if you answer “yes” to the questions in Block 1 and “no” in Block 2. If you have any questions, contact the AML and Compliance Division.

### Block 1 Questions

- i. Am I making this decision based on the Code of Ethics and Conduct guidelines and related policies? Have I read it before making this decision?
- ii. Is this decision in accordance with the applicable law? Does it also respect the rights of others?
- iii. Will my decision help Itaú, its subsidiaries and its stakeholders (e.g., customers, suppliers, partners or the government)?
- iv. Could my decision be made public without restriction?
- v. When consulting my manager, the AML and Compliance Division or other support area, am I disclosing all the related aspects and factors?

### Block 2 Questions

- i. Am I making this decision based on what others have said, without knowing the regulations or even knowing it may not align with internal and external regulations?
- ii. Is the decision being made solely to serve my own interests and/or those of third parties related to me?
- iii. If I make this decision, would I be embarrassed to tell my boss, co-workers, family and friends?
- iv. Could not making or abstaining from this decision harm the conglomerate or an employee or protect someone who has committed a violation or crime?

### Itaú Chile Code of Ethics and Conduct

The Itaú Chile Code of Ethics and Conduct is a public document approved by the Itaú Chile Board of Directors and applicable to all managers and employees. A set of guidelines, processes and affiliated entities called the Ethics and Conduct Program ensures adherence to the Code of Ethics and Conduct and Itaú principles and values. The program includes:

- Supplemental guidelines regarding conduct in relationships with different stakeholders, potential conflicts of interest and prevention of illegal acts
- Communication and training on the Code of Ethics and Conduct
- The responsibilities of the various parties, follow-up and protection of whistleblowers
- Ethics and Compliance Committee responsibilities in defining and overseeing the application of the guidelines herein
- Specific local policies related to the topics herein that international units must consult and observe
- Mandatory annual training through Itaú Chile courses for all Itaú Chile managers and employees

### Guidance and whistleblower channels

The Itaú Board of Directors and Senior Management value the importance of each employee's role in achieving high standards of organizational conduct. Itaú has created communication channels that ensure confidentiality, transparency, ease of access and anonymity to ensure that any Itaú associate or employee can express concerns, report irregularities, fraud, illegal, public or private corruption, violations or questionable situations related to accounting or internal control processes and, particularly, compliance with this code.

All reports shall be handled confidentially and in accordance with the nature of the information received. Under our non-retaliation regulations, each action shall be appropriately reviewed and evaluated using principles of good faith.

The channels for reporting irregularities, non-compliance with Itaú's rules and/or policies, crimes and wrongdoing are as follows:

- Anonymous Whistleblower Channel via the Itaú Intranet: Anonymous reports must include a complete description of the event, specifying the place (area or branch), parties responsible, date of the reported events and any other relevant background information.
- Email address: [Denuncias@itau.cl](mailto:Denuncias@itau.cl)
- Email address for suppliers: [Denuncias.Provedores@itau.cl](mailto:Denuncias.Provedores@itau.cl)
- The Compliance Division or the Compliance Officer/Crime Prevention Officer addresses reports submitted in person or via electronic means.



The [Denuncia.auditoria@itau.cl](mailto:Denuncia.auditoria@itau.cl) email address is the whistleblower channel for accounting, internal accounting controls or audit issues. It is active for Itaú and all its subsidiaries in Chile as well as its international units (Colombia, United States, Panama and Peru). The Audit Committee is responsible for receiving and processing the reports. However, regardless of the reporting mechanism, these situations shall be communicated to the appropriate internal governance bodies.

Reports shall be handled based on the following premises:

- The investigation shall be kept secret.
- Anonymity will be ensured where requested.
- The investigation will be impartial and independent.
- Unfounded allegations or accusations shall be dismissed.
- Reckless or bad-faith accusations meant to harm someone shall be subject to disciplinary action.
- Any attempted retaliation shall result in disciplinary action.

For more information on the whistleblower channels, please see the Internal Regulations on Handling and Acting on Reports.

### **Disciplinary actions**

Failure to comply with the guidelines herein, the Internal Order, Hygiene and Safety Regulations or other internal policies shall be subject to administrative sanctions under Itaú Chile bylaws. Such failure is also subject to the labor, administrative or criminal sanctions that may apply under local legislation.

# Code of Ethics and Conduct

