

CORPORATE ANTI-CORRUPTION POLICY

SUMMARY

This policy establishes the guidelines of the Corporate Anti-Corruption Policy for Itaú Corpbanca.

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1 OBJECTIVE

The Corporate Anti-Corruption Policy, hereinafter the “Policy”, is intended to reinforce the commitment of Itaú Corpbanca and its subsidiaries (hereinafter “Itaú”) to proactively cooperate with domestic and international initiatives to prevent and combat any form of corruption and, in addition, to establish guidelines for innovation, effectiveness and continuous improvement involving these matters.

Itaú condemns any form of direct or indirect, active or passive corruption, always seeking equality-based, transparent relationships. **Corruption** is defined as conducts resulting in the committing of crimes or offenses by a company, persons related to that company or public employees, that use their title, position or relationship with that company or government body to improperly obtain any advantage or benefit, decision or omission that is favorable to the interests of the group, third parties or their own.

2 TARGET AUDIENCE

This Policy applies to all Itaú employees and directors with respect to any person with which Itaú has commercial relationships, including customers, associates, suppliers and other stakeholders.

3 RESPONSIBILITIES

All the aforementioned persons have the obligation to know, comply with and collaborate in applying this Policy. They must take care at all times to comply with insider information standards set forth in laws, regulations and internal rules of Itaú Corpbanca, and must conduct themselves with prudence and due diligence in their private life and/or with related parties.

a. Itaú Corpbanca Directors and Employees

- Know and follow the guidelines of this Policy, which includes completing training courses on matters related to anti-corruption.
- Be familiar with the Code of Ethics, the General Code of Conduct, the Securities Market Code of Conduct, the Market Information Manual and the Asset Laundering, Terrorism Financing and Illicit Activity Prevention Policy, and consider themselves knowledgeable of and in agreement with the provisions of this Policy.

b. Compliance and AML Department

The Ethics and Conduct Area within the Compliance and AML Department, hereinafter “Compliance”, must:

- Update this Policy in order to ensure it reflects amendments to regulations, laws, guidelines, instruments or practices.
- Set parameters for corporate training courses and specific sessions on this Policy, as well as training and communication plans.
- Answer market sustainability questionnaires related to the topic of preventing corruption.

- Periodically report its activities related to the Policy to the Itaú Corpbanca Compliance Committee.
 - Answer questions about this Policy and its application.
 - Publicize complaint channels available for employees and suppliers, and process complaints received.
- c. Purchasing, Assets Received in Lieu of Payment and General Services Department**
- Include clauses on the guidance in this Policy in new employee, supplier and sponsorship contracts.
 - Establish procedures for getting to know suppliers (Know Your Supplier), in conformity with the Asset Laundering, Terrorism Financing and Bribery Prevention Policy.
- d. Corporate Legal Division**
- Interpret changes in laws related to the Policy.
 - Answer questions from Compliance about laws related to corruption.
 - Draft, establish and review, when necessary, standard anti-corruption clauses to be included in contracts with third parties.
- e. Corporate Finance Division**
- Ensure that the Donations process complies with standards required by this Policy.
- f. Accounting Division**
- Guarantee that Itaú's financial statements reflect the complete truth and are in concordance with the accounting practices of the respective regulators.
 - Establish guidelines for proper financial statement disclosure.

4 RULES

The following principles govern Itaú's actions to prevent and combat corruption.

4.1 Management Commitment

The Board, through the General Code of Conduct, details the Itaú Corpbanca standards and values that must be observed by the persons mentioned in this Policy. Those standards include maintaining policies and practices to prevent and combat all forms of corruption, asset laundering, terrorism financing, fraud and other illicit acts.

- It must provide the financial, material and human resources to implement and maintain the controls and regulations instructed by this Policy.

- Management must act with transparency and integrity in its relationships, transactions and information disclosed to the market, and must participate in available trainings and talks.

4.2 General Rules for Engaging with Public and Private Agents

Itaú undertakes and makes an effort to maintain an ethical and transparent relationship with all public (*empleados de la administración pública* or EAP in Spanish), private and economic agents. It must always respect the rules that govern public administration, as well as current laws and regulations and the principles set forth in the Itaú Code of Ethics, ensuring that it always acts with integrity and good faith in negotiations and relations. For the purposes of this policy, acts that constitute corruption include acts with both public (EAP) and private agents, as well as any economic agent.

The general rules that the Itaú Directors and employees must adopt in any type of relationship with an EAP, directly or through third parties, are:

- Employee interactions with an EAP must be impartial and independent, with no bias towards any particular political or partisan ideology, always guided by the main objective of defending the interests of Itaú, the financial sector and the country.
- Private meetings with an EAP are only allowed when they fit within the context of the employee's work based on his or her position. Compliance must be notified of such meetings, indicating the date, participant names and the reason for the meeting. For more details, review the Employee Gifts and Invitations Policy and the Gifts and Invitations from Customers and Third Parties Policy.
- It is prohibited from offering, promising, giving or accepting, directly or through third parties, economic benefits or improper advantages to or from any type of EAP and/or private agent, as a way of facilitating business, omitting acts or obtaining benefits for Itaú.
- It is prohibited from interfering with or hindering audits or investigations by public bodies or regulators.
- Regarding the provision of reports, answers, clarifications and information to public administration entities and EAPs, the full contents must be complete, up-to-date and provided in good faith, without falsifying facts, information and arguments.
- It is prohibited from engaging in or collaborate with acts that may be considered detrimental to public administration.

4.3 Anti-corruption Conduct

Itaú respects all domestic and international regulations and the Anti-corruption Act, with its main benchmark being the U.S. Foreign Corrupt Practices Act (FCPA). All these standards were enacted in order to prevent the making of payments to foreign government officials in order to facilitate the obtaining or retaining of business.

The FCPA is applicable to the following categories of persons and entities:

- 1) Individuals that are United States citizens or residents and United States entities (and officials, directors, employees, agents and shareholders acting on behalf of those entities) (“domestic consortia”).
- 2) All United States securities issuers (companies that trade on exchanges, including foreign companies that trade their securities in the United States).

4.4 Gifts and Invitations

As for offering or receiving gifts and/or invitations from EAPs, holders of public positions or members of political parties, the rules established for that purpose in the Employee Gifts and Invitations Policy, the Gifts and Invitations from Customers and Third Parties and the Itaú Corpbanca Code of Ethics must be observed.

Therefore, the following must be considered:

- When extending invitations to persons categorized as PEP, EAP or members of political parties to engagement events and/or events sponsored by Itaú, the procedure established for that purpose in the Gifts and Invitations from Customers and Third Parties must be followed.
- Itaú Corpbanca employees are prohibited from receiving or giving, under any concept, gifts from/to EAPs, holders of public positions and members of political parties.
- Itaú Corpbanca is prohibited from making contributions to political parties or political candidates, as our actions should always be focused on maintaining the independence and transparency of our commercial and institutional relationships.

4.5 Control Systems

a. Integrity of Accounting and Financial Information

Itaú prepares its accounting statements in adherence to the laws and rules of the countries in which it does business and discloses transactions with rigor and clarity in order to ensure equality and transparency for stakeholders.

The Internal Auditing Department evaluates, based on its plan, the effectiveness of controls related to accounting management and financial reporting and the governance structure used by Itaú to ensure compliance with laws and regulations, and verifies the accuracy, reliability and timing of relevant information, whether of an accounting, managerial or operational nature.

External auditors perform recurring mandatory audits of the financial statements of the Itaú companies.

Itaú Corpbanca follows rules defined to comply with the Sarbanes-Oxley Act (SOX).

b. Proportional Procedures

Itaú Corpbanca adopts procedures in proportion to corruption risks based on the nature, scale and complexity of the activities in which it engages. In this sense, the documents listed below present guidelines and procedures to help comply with this Policy and anti-corruption practices:

- Management of conflicts of interest (General Code of Conduct for Itaú Corpbanca and Subsidiaries)
- Criteria and examples for accepting presents, gifts and contributions (Code of Ethics and Employee Gifts and Invitations Policy)
- Accounting policies and practices (together with financial statements);
- Transparency in market transactions and information (Market Information Manual and Securities Market Code of Conduct);
- Monitoring of transactions with Politically Exposed Persons (Asset Laundering, Terrorism Financing, Bribery and Illicit Acts Prevention Policy).

c. Risk Assessment and Monitoring

Itaú evaluates risks related to the matters in this Policy using its risk management structure, internal controls and the Compliance Division.

d. Due Diligence

Itaú adopts due diligence procedures proportional to the risk of corruption of its activities in the jurisdictions where it operates and in reference to the persons covered by this Policy (e.g., in its Know Your Customer (KYC), Know Your Supplier (KYS) and Know Your Employee (KYE) policies, etc.).

e. Communication and Training

Itaú must regularly communicate the principles established herein to the persons covered by this Policy in order to promote anti-corruption practices. It must make available to Group employees periodic training courses that help them understand and be aware of this topic.

f. Rules for Preventing and Combating Fraud

Itaú adopts measures to prevent and combat fraud. These include assessing risks at the beginning of a relationship with different potential parties; evaluating new products and services; monitoring transactions; identifying, investigating and resolving incidents and implementing employee training programs. The Cybersecurity and Fraud Division is responsible for implementing these controls.

g. Record of Itaú Interactions and Representation with Public Agents

For in-person interactions with EAPs, Itaú Corpbanca must always be represented by, at least, two employees, who must keep a record of the meeting. Exceptions to this rule include:

- Strictly commercial interactions with the Wholesale and Retail Banking divisions.
- Interactions at conferences and talks
- Interactions between employees from the Legal Division and officials from the Judiciary Branch (understood to include ordinary and special courts as defined by the Organic Court Code) and employees of the Judicial Administration, the Public Defender's Office, Legal Aid Foundations, the Public Prosecutor's Office, among others, in order to monitor and act in court proceedings to which Itaú is party, in which it is involved or that are of interest to Itaú Corpbanca.

5 PROHIBITIONS

It is prohibited from engaging in any unfair behavior intended to obtain illegal, improper, non-transparent or inappropriate advantages for the entity, its administrators, directors and employees. The prohibition extends to persons and companies in the public and private sectors (including third sector organizations).

Consequently, the general conduct guidelines that should be followed include, but are not limited to:

- a. Not giving, offering or accepting gifts or economic or other types of benefits, for themselves or a third party, that may be designed to:
 - Facilitate or favor the obtaining or retaining of business, a contract, an interest or an advantage in favor of or for Itaú;
 - Influence, with that purpose, those with decision-making capacity
 - in order to favor or for having favored, in carrying out his or her duties, the contracting of one bidder over another.

- b. Not accepting or requesting any payments for him/herself or a third party that involves the payment of a commission or compensation for granting a service, business or benefit.
- c. Not permitting the granting of illegitimate favors or advantages to entities or persons with which Itaú maintains or may maintain contractual or business relations.
- d. Not taking advantage of a position at Itaú or a personal relationship to try to improperly influence employees, authorities, public employees or private individuals.
- e. Conflicts of interest must be avoided and Compliance must be notified of any real or potential situation that may involve a conflict of interest.

6 RELATED DOCUMENTS

- FCPA (Foreign Corrupt Practice Act)
- Itaú Corpbanca General Code of Conduct
- Itaú Corpbanca Code of Ethics
- Asset Laundering, Terrorism Financing and Illicit Acts Prevention Policy
- Securities Market Code of Conduct and Market Information Manuals
- Policy on Gifts and Invitations from Customers and Third Parties
- Employee Gifts and Invitations Policy
- Internal Donations Standard

7 COMPLAINT CHANNELS AND INFORMANT PROTECTION

Compliance must be immediately notified of suspected or confirmed incidents of corruption using any of the following channels:

a. For employees:

- E-mail address: CodigodeEticaChile@itau.cl
- Anonymous Reporting Channel: located on the Itaú Corpbanca Intranet.
- By mail, courier or in person: Compliance and AML Department, Av. Presidente Riesco 5537, 11th floor, Las Condes.
- Reporting channel for matters relating to accounting, internal accounting controls or auditing: denuncias.fraudefinancierosx@itau.cl, managed by Audit Committee.

b. For customers and suppliers:

- Contact form located on Itaú's public website.
- Denuncias.Proveedores@itau.cl

Similarly, Directors and employees cannot engage in acts of retaliation against those who, in good faith, file complaints or express suspicions, doubts or concerns regarding possible violations of the guidelines of this Policy, and/or provide information or assistance in investigations related to these possible violations. This is also addressed in detail in the Itaú General Code of Conduct.

8 DISCIPLINARY ACTIONS

Failure to comply with any of the guidelines or principles in this Policy will be considered a serious violation of the employment contract and will be subject to disciplinary actions, notwithstanding application of current laws, which shall be determined by the appropriate governance body. The above is notwithstanding any criminal, administrative or labor liability based on applicable laws.

9 GLOSSARY

- **Corruption:** any and all actions, negligent or felonious, that involve suggesting, offering, promising, conceding (actively) or soliciting, demanding, accepting or receiving (passively) improper advantages, of a financial or other nature, such as: bribery, influence peddling and favoritism in exchange for performing or omitting acts that fall under their authority or for doing business, operations or activities for the Itaú Corpbanca Group or that are intended to obtain benefits for it or for third parties.
- **Third Sector Organization:** not for profit entities. These include foundations and non-governmental organizations (NGOs).
- **Retaliation:** Response of punishment or revenge against managers or employees as a result of complaints or expression of doubts, suspicions or implications of possible violations of this Policy or of illegal and non-ethical actions. Examples of retaliation include: threats, poor evaluations, black listing, suspension and dismissal, among others.
- **EAP:** Public administration employee, including Politically Exposed Persons (PEP), Public Officials, members of political parties and holders of public positions.