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ANTI-BRIBERY AND CORRUPTION POLICY

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In charge	Compliance Officer		
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Aprobado por la
Gerencia de Ética
y Compliance

1. Objective

Sociedad Química y Minera de Chile SA (“SQM”) maintains a firm commitment to creating and keep a culture of integrity, contrary to the Corruption, doing worth and achieve all the laws, so much nationals as foreigners that you be applicable, in all its activities. In this regard, no form of bribery or corruption is tolerated.

The purpose of this Anti-Bribery and Anti-Corruption Policy (the “Policy”) is to establish the guiding principles regarding anti-bribery and anti-corruption, governing the actions of all persons working at SQM or having relations with it.

This Policy establishes general rules and is not intended to cover all potential situations that those bound by it may encounter in the performance of their duties. If you have any questions regarding a specific circumstance or if you have a question about the Policy, you should contact SQM’s Ethics and Compliance Department at complianceNY@sqm.com.

In this Policy, the terms in capital initial will have the meaning indicated in Annex No. 1 and, if not defined, they will be understood according to their natural and obvious meaning.

2. Scope

This Policy applies to SQM, its subsidiaries, and companies in which SQM has a stake equal to or greater than 50%, except for those subsidiaries that make up the Lithium-Potassium Division. International Lithium Division, and the companies Soquimich Comercial SA, and Ajay-SQM Chile SA, which will be governed by their own policies and procedures, without prejudice to the latter having to report to SQM on their work.

3. Principles

The following principles must govern any act carried out by SQM to comply with the present Policy:

3.1 Anti-corruption.

SQM prohibits any form of Improper Payments, whether made directly by SQM employees or by third parties on their behalf. For this Policy, the term Improper Payments includes a broad range of corrupt payments, which may include cash, any item of value, or any benefit or advantage, not necessarily financial, made or granted to favorably influence or obtain an undue advantage in favor of SQM. The term Improper Payments also includes the following corrupt payments:

3.1.1 Cash equivalents (such as gift cards or prepaid credit cards).

- 3.1.2 Gifts.
- 3.1.3 Entertainment, meals, and trips.
- 3.1.4 Contributions and/or services in species.
- 3.1.5 Business, employment, or investment opportunities.
- 3.1.6 Use of SQM products, services, facilities, equipment, or properties without compensation or at a discount.
- 3.1.7 Donations or contributions, including the delivery of goods without compensation or discount (including salvage items).
- 3.1.8 Payment of medical bills.
- 3.1.9 Assistance or support for relatives or friends.
- 3.1.10 Contributions of charity, even to organizations of good faith.
- 3.1.11 Other benefits and advantages.

The Anti-corruption Policy is completely clear: nobody can offer, give, or receive Bribes or Improper Payments related to their job for SQM at any time and for any reason. No one should solicit another party to participate in a bribe or make an Improper Payment on behalf of SQM, regardless of local laws or customs, even if it means SQM could lose money or delay a project.

All SQM personnel must fully comply with this Anti-Corruption Policy and, ultimately, no executive, director, employee, or commercial partner may:

- 3.1.12 Offer, promise, pay, or authorize an offer or payment of money or any article of worth to a Public Official or any other person or entity, direct or indirect, public or private:
 - 3.1.12.1 To corruptly influence in any measure, omission, or decision that the recipient may take in their capacity as a Public Official.
 - 3.1.12.2 To induce the receiver in an improper manner, to use his influence to affect a measure or to make a decision of the entity involved.
 - 3.1.12.3 To obtain an improper advantage or assist SQM in obtaining or retaining business.
 - 3.1.12.4 To show gratitude to the recipient for having taken a decision or having acted in a manner such that SQM was unduly benefited.
- 3.1.13 Request or accept money or another article of worth, direct or indirectly:
 - 3.1.13.1 To influence in an improper manner the conduct of the recipient, either to take an action, omit an action, or use his or her influence in

the performance of his or her job responsibilities.

3.1.13.2 To show gratitude for having made a decision or having acted improperly on behalf of the person who gave the item of value to the recipient.

3.2 Records.

Various anti-corruption laws around the world contain provisions that require SQM to keep its books, records, and accounts accurately, and to record with accuracy the transactions and movements of the company, and to maintain internal controls to provide reasonable assurance that transactions are performed and recorded appropriately.

Accordingly, all SQM employees and collaborators must accurately document and record all expenses incurred on behalf of SQM, and are prohibited from concealing or misrepresenting company expenses, or making payments on behalf of SQM without the necessary approvals and supporting documentation that verify the validity of the transaction, all of which must be done in an absolutely transparent manner.

3.3 Formality.

Not all payments made by SQM are improper; only those that have fraudulent intentions, as was indicated previously. In such sense, the Payments made or received by SQM must be made in strict compliance with the procedures that regulate the specific matter for which the payment falls, with each transaction being recorded in the corresponding accounting entries.

4. Specific Rules of Conduct

4.1 Prohibition of bribing public officials. All employees and collaborators of SQM and its subsidiaries are prohibited from granting, promising, or offering, directly or indirectly, any Improper Payment to a Public Official, a Close Person of a Public Official, or to any other person at the request of a Public Official, or with the permission or consent of a Public Official.

SQM also prohibits any Improper Payment, promise, offer, or authorization for an Improper Payment to any person, knowing that it goes to grant or share with a Public Official, Close Person of a Public Official, or other person appointed to that position.

For the effects of this Policy, Public Official means:

4.1.1 Any officer or employee of any government, national or foreign, regional, local, or any department, agency, or representative of such government, including any elected or appointed official in any branch (executive, legislative, or judicial).

4.1.2 Any officer or employee of a corporation or company owned by or controlled by, or that plays a function of a government.

- 4.1.3 Any officer or employee of universities or public or state-sponsored research organizations.
- 4.1.4 Any political party, officer of a political party, or candidate for public office at any level.
- 4.1.5 Any officer or employee of a public international organization (e.g., the World Bank, the United Nations, or the International Monetary Fund).
- 4.1.6 Any member of a royal family or of the military forces of any country.
- 4.1.7 Any natural person, whether acting in an official capacity, for, or on behalf of any of the above categories (whether paid or unpaid).
- 4.1.8 Any natural person who otherwise qualifies as a Public Official under applicable local laws.

For this Policy, the term Close Person includes spouses, partners, parents, grandparents, siblings, children, grandchildren, nieces, nephews, aunts, uncles, or cousins, whether related by blood or marriage, including those of the Public Official's spouse or partner, a business partner, or any other person the Public Official considers close.

SQM permits the provision of certain Business Courtesies, such as meals, to Public Officials within a concise list of exceptions established in the Business Courtesies Procedure and the Protocol for Relations with Public Officials, and only following what is permitted by applicable laws, including the written laws of the Public Official's country.

- 4.2 Prohibition of commercial bribery. All SQM employees and collaborators are forbidden to grant, pledge, offer, authorize, directly or indirectly, Improper Payments, including bribes, kickbacks, or payments to suppliers, customers, or other third parties to improperly influence the actions of the other party to obtain an improper advantage in the commercial conduct of their employee or principal. This includes granting offers or benefits to someone who doesn't know who the employer or principal of that person is.
- 4.3 Prohibition on Receiving Improper Payments. None of SQM's employees and collaborators may agree to, receive, or accept, directly or indirectly, any advantage, financial or otherwise, from other person, nor any article of value, to induce or reward improper performance of services or benefits.
- 4.4 Prohibition on making political contributions. SQM does not make contributions of any kind to any political party, party officials, or political candidates.
- 4.5 Prohibition on "Facilitation Payments." Payments made to public officials to encourage or accelerate the fulfillment of an existing duty or obligation (generally called "Facilitation Payments") are prohibited by SQM.

5. [Whistleblower Channel](#)

All collaborators must channel the information they have, or the complaints regarding any activity prohibited by this Policy, through the Whistleblower Channel.

The Whistleblower Channel communication channels are: (i) through the website <http://denuncias.sqm.com/>; (ii) through other means established in the SQM Code of Ethics available at <https://mi.sqm.com/etica>. SQM will not retaliate or tolerate retaliation against employees who report in good faith a potential violation of this Policy, even if an investigation determines that no violation has occurred.

Questions related to this Policy or applicable anti-corruption laws should be directed to the Ethics and Compliance Department.

6. [Compliance of the Policy.](#)

All employees are responsible for ensuring strict compliance with this Policy, as well as other associated internal regulations. Any violation of the aforementioned regulations may result in disciplinary measures against the employee involved, as established in the Code of Ethics, current legislation, and SQM's RIOHS, and may even result in dismissal in cases of seriousness or recurrence.

Employees with doubts about whether a specific conduct could infringe this Policy or related regulations should consult the Ethics and Compliance Department and refrain from action until they receive a response to their consultation.

7. [References](#)

7.1 Code of Ethics of SQM.

7.2 Policy of Courtesies Commercials.

7.3 Procedure of Courtesies Commercials.

7.4 Policy of Contributions and Donations.

7.5 Procedure of Contributions and Donations.

7.6 Protocol of Relationship with Officials Public.

7.7 Regulation Internal of Order Hygiene and Security from SQM.

Annex 1 Definitions

"Close Person" spouse, couple(s), parents, grandparents, siblings, children, grandchildren, other relatives, whether by blood or marriage; business partners, or any other person the FFPP considers close.

"Bribery" crime that consists of offering, giving, receiving, or requesting something of value to influence the actions of a person. Generally, bribery implies an illegal or immoral transaction designed to obtain an undue advantage in activities such as decision-making, awarding contracts, approving regulations, or providing public services, among others.

"Business Courtesy" Any benefit provided free of charge, or at a cost below market price, including, but not limited to: gifts, travel payments, meals, entertainment, business or employment opportunities, etc. Payments or reimbursements for travel, meals, and lodging expenses for suppliers that are contractually enforceable in accordance with the policies or procedures of SQM are excluded.

"Corruption" Social and political phenomenon that implies the abuse of power to obtain personal benefits or undue advantages. It can manifest itself in various forms, such as bribery, embezzlement, nepotism, and influence peddling, among others. In essence, corruption undermines transparency, justice, and equity in institutions, weakening public trust.

"FFPP" or "Official Public" (a) Any officer or employee of a national, regional, local or other government, or any department, agency or representative of such government, including any elected or appointed official in any branch (executive, legislative or judicial); (b) any officer or employee of a corporation or enterprise owned, controlled, or performing the functions of a government; (c) any officer or employee of universities or organizations public or state-sponsored research; (d) any political party, party official political or candidate to a public position of any level; (e) any civil servant or employee of an international public organization (e.g., the World Bank, the United Nations, or the Monetary International Fund); (f) any member of a royal family or member of the military forces; (g) any natural person acting in an official capacity for or on behalf of any of the above categories (whether remunerated or unpaid); and (h) any natural person who otherwise qualifies as a Public Official under applicable local laws.

"Improper Payment" Delivery of any kind of benefit or thing of value, including, but not limited to, cash, cash equivalents, goods and services, gifts, trips, leisure, accommodation, promotion or distinction, the concession of a contract or an official permit or an administrative decision, done to obtain a benefit or withhold an inappropriate benefit.

"RIOHS" Reglamento Interno de Orden Higiene y Seguridad de SQM.

"SQM" Sociedad Química y Minera de Chile SA