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Corporate Policy

Conflict of Interest Policy Sociedad Química y Minera de Chile S.A.

Responsible Department
Compliance Department

Approved by
Board of Directors

March 2026

1. **Objective**

The purpose of this policy is to protect the integrity of the decision-making process at Sociedad Química y Minera de Chile S.A. (“SQM” or the “Company”) or its subsidiaries by identifying the main situations that could give rise to a Conflict of Interest, as defined below.

A Conflict of Interest relates primarily to situations in which an SQM Employee (as defined below), by virtue of their role, duties, or position, may participate in, decide on, or influence Company matters in which they have a personal interest that conflicts with the Company’s interests. As an essential element of its relationship with its suppliers, SQM expects them to be proactive in disclosing any Conflict of Interest.

This document establishes the manner in which SQM Employees must act to communicate, manage, and administer these conflicts.

2. **Definitions**

The terms defined in uppercase in this document shall have the meaning described for each of them in this policy, and such meaning shall prevail over the meaning that the law or the respective science, art, technique, or industry, where such term is in common use, may give it. The use of a term in the singular or plural or in the masculine or feminine gender shall not alter the definition given to such term.

“SQM Personnel”: any director, executive, or employee of SQM.

“Conflict of Interest”: any currently existing situation in which the independence of judgment of an SQM Employee and the integrity of their decision or action are compromised by a personal, family, or financial interest that conflicts with SQM’s interests in such a way as to affect or potentially affect the performance of that employee’s duties, decisions, and actions within the Company.

“Senior Executives”: those SQM Employees reported to the Financial Market Commission as such, in accordance with current legislation.

“Compliance Officer”: an SQM employee whose primary role is the coordination and enforcement of policies and procedures for the prevention and detection of transactions that pose a risk to the Company.

“Related-Party Transaction”: has the meaning assigned in Article 146 of Law No. 18,046 on Corporations.

“Third-Party Sponsor”: An SQM Employee who supports and actively participates in the hiring or appointment of the Third Party.

“Close Associate”: any person who maintains a close friendship, romantic, or business relationship with an SQM Employee. Any other person who has a relationship with an SQM Employee shall also be considered a close associate if such relationship compromises or may

compromise the independence of the SQM Partner.

“Procedure for Business Courtesies”: refers to the procedure contained in the document titled “SQM Procedure for Business Courtesies,” which is available in the SQM Policies and Procedures Library (<http://www.sqm.com/politicas>).

“Family Relationship”: includes the following ties or relationships: father, stepfather, grandfather, brother, stepbrother, son, stepson, father-in-law, son-in-law, daughter-in-law, brother-in-law, nephew, uncle, cousin, domestic partner, spouse, and partner.

“Third Party”: any natural or legal person who supplies goods or provides any professional or commercial service to SQM, but excluding only suppliers of goods or services related to meal or travel expenses (e.g., restaurants, hotels, airlines) that are reported through expense reports and not paid directly by SQM.

3. Scope

This policy applies to all SQM Employees. Furthermore, SQM expects its customers and suppliers to adhere to the principles set forth in this document, refraining from unduly influencing the decisions of SQM Employees.

If a director has an interest in or participates in a Related-Party Transaction and such interest or participation constitutes a Conflict of Interest, the rules and procedures applicable to Related-Party Transactions—as set forth in Law No. 18,046 on Corporations, its Regulations, the applicable regulations of the Financial Market Commission, and SQM’s Protocol for the Management of Related-Party Transactions.

4. Situations That Could Constitute a Conflict of Interest

As part of our commitment to integrity, it is essential to take measures to ensure that decisions made by SQM Employees are adopted with the Company’s interests taking precedence over any personal interests that the person involved in the decision-making process may have.

The following describes the most common situations that, for the purposes of this policy, give rise to a presumption of a conflict of interest:

(a) Family Relationship or Close Personal Relationship:

- With another SQM employee: An SQM employee is in a conflict of interest if they have a family relationship with or are a close associate of another SQM employee. The mere existence of a family relationship between two SQM employees or the fact that they are close associates of one another is not prohibited, but it does require a declaration so that appropriate and adequate measures can be taken in accordance with this policy.
- With persons outside SQM: an SQM employee is in a conflict of interest situation if



SQM employee who has a Family Relationship with or is a Close Relative of a person who is related in terms of ownership or management, as provided in the following two paragraphs, to any supplier, contractor, customer, or competitor of SQM; or who is a director, executive, administrator, employee, or liquidator—whether permanent or temporary—of any SQM supplier, contractor, customer, or competitor; or who is running for or currently holds a political office or a high-profile public position involving influence, oversight, or other responsibilities related to SQM. These situations are not prohibited, but they must be properly disclosed so that appropriate measures can be taken in accordance with this policy. To enable SQM Employees to properly disclose any Conflicts of Interest involving individuals outside of SQM, the Company will maintain, and keep duly updated on its website, a list of the Company's customers, competitors, suppliers, and contractors.

(b) Ownership Relationship:

An SQM Employee is in a Conflict of Interest situation if they have a direct or indirect ownership interest in a company or entity that has a relationship with SQM as a supplier, contractor, customer, or competitor. In the case of publicly traded corporations, it is presumed that no Conflict of Interest exists if the SQM Employee holds an ownership interest in the corporation of less than 10% of the share capital and/or does not have the right to appoint a director either alone or through a joint action agreement.

(c) Management Relationship:

An SQM employee is considered to be in a conflict of interest if they have a role in the management of a business or operating company, corporation, foundation, trade association, union, or any other nonprofit entity that has a relationship with SQM as a supplier, contractor, customer, competitor, beneficiary, or counterparty. An SQM Employee shall be deemed to have a role in the management if they serve as a director, representative, administrator, manager, or executive with broad individual decision-making powers in the respective operating company or entity.

Additionally, an SQM Employee is in a Conflict of Interest situation when they are running for or hold a political office or a position of public prominence that relates to, influences, or oversees SQM's business.

(d) Other causes:

Notwithstanding the examples listed above, if an SQM Employee believes they are in a situation that compromises their impartiality in deciding a matter or where their decision may be contrary to the duty of integrity governing their actions, they must report such a situation as a Conflict of Interest and follow the measures adopted in accordance with this policy.

Below is a list of examples of Conflicts of Interest that may arise:



Subjects	Type of Conflict	Situation or Activity
From or between Employees	Employment Relationship	A relative works at SQM or is applying for a position at SQM. You Relatives may not be hired or assigned to positions that report to or are subordinate to one another within the same department. If the situation arises later (e.g., marriage between individuals in the same department or reporting line, one of them must be assigned to a different department).
	Competitive Loyalty	Engaging in activities or providing services that interfere with your duties at SQM or receiving compensation or other incentives from a company or entity that does business with (customer, distributor, supplier, etc.) or competes with SQM or engages in similar activities.
	Decision Loyalty	Any situation that could affect an SQM employee's ability to make decisions or perform their work, with the aim of protecting SQM's best interests, or when an SQM employee receives business courtesies from suppliers, customers, or third parties that place them in that same situation.
	Political position or office or public office	Refers to SQM employees who run for or hold a with influence, oversight, or responsibilities related to SQM's business.
With Suppliers and Third Parties	Personal benefit	An SQM Employee is related to a person, company, or other entity (for example, is an owner, shareholder, employee, advisor, beneficiary, etc.) that is or intends to be a supplier to SQM. It is prohibited to take advantage of SQM's service or business needs or to obtain any benefit from one's position at SQM, access to confidential information, or databases for personal gain.
	Benefit to a relative	A relative of an SQM employee is related to a person, company, or other entity that is or is applying to be a supplier.
	Preferential Treatment	No supplier or third party shall receive special terms based on personal, family, or other ties, but only on strictly commercial or operational terms, ensuring SQM's sole interest. Any situation that could affect impartiality or objectivity when purchasing products or contracting services must be avoided.
	Political position or office or public prominence	A situation arises when an SQM Employee is related to a person who is running for or holds a political or public office.
With Customers and Distributors	Personal benefit	An SQM employee is related to a person, company, or other entity (e.g., owner, shareholder, employee, consultant, etc.) that is or intends to be a client, partner, or competitor of SQM. It is prohibited to take advantage of SQM's business opportunities or confidential information, or to derive any benefit from one's position at SQM for personal gain.
	Relative's Benefit	A relative of an SQM employee is related to a person, company, or other entity that is or intends to be a customer, partner, or competitor of SQM.
	Preferential Treatment	No customer, distributor, agent, or business partner shall receive based on personal, family, or other ties, but only on strictly commercial or operational terms, ensuring SQM's sole interest.

5. Procedure

Upon the effective date of this policy, SQM Employees must comply with the following obligations:

- (a) Complete the annual Conflict of Interest disclosure form available on the *Compliance* Department's platform, and update it to reflect any changes in circumstances that may occur during the year.
- (b) Refrain from participating in any decision, contract, and/or negotiation in which you have a Conflict of Interest, unless you have authorization in accordance with the procedure described in this document.
- (c) Comply with the mitigation and management measures defined in each case.

All information received through a Conflict of Interest declaration shall be treated as confidential, and its content shall be shared only with those individuals or departments of the Company who, in accordance with this policy, are responsible for properly managing said Conflict of Interest.

5.1 Conflict of Interest Disclosure

All SQM Employees must submit their Conflict of Interest declaration through the Compliance Department's Platform within 60 days of this policy taking effect and, furthermore, on the occasions set forth below:

- (a) SQM Directors: must submit a Conflict of Interest declaration within one month of their appointment and each time they identify a new Conflict of Interest not previously disclosed.
- (b) SQM Employees and Senior Executives: must submit their Conflict of Interest disclosure upon joining SQM, whenever they identify a new Conflict of Interest not previously disclosed, and at least once a year.

Until a declared conflict of interest has been managed in accordance with Section 5.2 of this policy, the relevant SQM employee must refrain from making decisions or influencing decision-making regarding the matter for which the conflict of interest has been declared.

5.2 Conflict of Interest Management

(a) General Procedure

As soon as a declaration of a Conflict of Interest is reported or comes to the attention of the *Compliance* Department, the Compliance Officer must analyze the situation and issue a ruling as quickly as possible, and may:

- Determine that the reported situation does not constitute an actual Conflict of Interest.

- Indicate that the reported situation constitutes a Conflict of Interest that can be mitigated.
- Determine that the reported Conflict of Interest cannot be mitigated, meaning the position, activity, relationship, etc., cannot be carried out by the Employee.

The Compliance Department will notify the affected individual and their direct supervisor of its decision via the Compliance Department Platform. The affected SQM Employee must indicate their agreement or disagreement with the resolution of the case by submitting their response to the Compliance Officer within 5 days of receiving the notification. Failure to respond will be deemed acceptance of the decision. If the SQM Employee disagrees with the decision, the Compliance Officer must review and analyze the situation again and, if necessary, refer the case to the Company's Ethics and Compliance Committee for review and final resolution.

The person who submits a Conflict of Interest disclosure is primarily responsible for complying with all management measures determined by the Compliance Officer or the Board of Directors, as applicable. The immediate supervisor of the SQM employee involved shall be responsible for overseeing proper compliance with the management measures adopted. This is without prejudice to the oversight and monitoring functions to be carried out by the Compliance Department, in accordance with Section 5.4 below.

(b) Procedure for Directors and Senior Executives

As soon as a declaration of Conflict of Interest by a director or senior executive is reported or comes to the attention of the Compliance Officer, the latter must contact the relevant body, as indicated below, so that they may jointly analyze the situation and issue a ruling as soon as possible:

- (i) If the declaration of a Conflict of Interest comes from a director, the Compliance Officer must agree with the Board of Directors on the measures appropriate to address such conflict, and these will be proposed to the Board of Directors for approval and resolution; the Board of Directors must then implement the adopted measures. If the director involved is a member of the Board of Directors, he or she must abstain from the Board of Directors' decision resolving his or her case. If two or more members of the Board of Directors are involved, the Company's Board of Directors shall analyze and definitively resolve the case, with the involved directors abstaining from the decision.
- (ii) If the disclosure of a conflict of interest is made by a senior executive, the Compliance Officer must work with the Board of Directors to resolve the conflict.

The Compliance Officer shall be responsible for notifying the affected party of the decision. The affected director or Chief Executive Officer must indicate whether they agree with or reject the decision on the matter, submitting their response to the Compliance Officer within 5 days of receiving the notification. Failure to respond shall be deemed acceptance of the decision. If the director or Chief Executive Officer of SQM does not agree with the decision, the Compliance Officer must refer the case to the Company's Board of Directors for review and final resolution. In such a case, and in the event of a declaration of a conflict of interest by a director,

That person must abstain from voting on the decision in the case.

The person who submits a Conflict of Interest statement is primarily responsible for complying with all management measures determined by the Compliance Officer, together with the person designated in items (i) and (ii) above, or by the Board of Directors, as applicable. The direct supervisor of the Chief Executive Officer involved, or the General Manager in the case of conflicts involving a director, shall be responsible for overseeing proper compliance with the management measures adopted. Under no circumstances may the management measures deprive, restrict, or limit the rights and duties of directors. The foregoing is without prejudice to the supervision and monitoring functions to be carried out by the Compliance Department, in accordance with Section 5.4 below.

5.3 Third-Party Conflicts of Interest

As part of the contracting processes of the respective company departments, the Third-Party Sponsor shall require the Third Party to report any Conflict of Interest that may exist, in accordance with the provisions of the General Procedure for Establishing Relationships with Third Parties.

The Third-Party Sponsor must notify the Compliance Department in writing as soon as it receives a declaration of a Conflict of Interest from a Third Party, so that the Compliance Officer can analyze the situation and issue a decision as quickly as possible regarding management or resolution measures.

The Compliance Officer shall be responsible for informing the Third-Party Sponsor and their direct supervisor of the measures. The Third-Party Sponsor must indicate their agreement or disagreement with the resolution of the case, submitting their response to the Compliance Officer within 5 days of receiving the notification. If they do not respond, it will be understood that they agree with the resolution. If the Third-Party Sponsor does not agree with the resolution, the Compliance Department will refer the case to the Ethics Committee for review and final resolution. The Third-Party Sponsor will then be responsible for communicating and implementing the measures regarding the Third Party.

If the measures relate to a conflict of interest not yet disclosed by an SQM Employee, Director, or Senior Executive, the Compliance Officer shall notify such persons, and the general procedure set forth in Section 5.2 shall apply to them.

SQM must refrain from contracting with a Third Party who has declared a Conflict of Interest while the Compliance Department's ruling on said conflict is pending; this process may not exceed 15 days from the submission of the Third Party's Conflict of Interest declaration.

Finally, whenever a commercial courtesy is to be received or given to a Third Party, the Procedure for Commercial Courtesies must be followed.

5.4 Recording and Monitoring of Conflicts of Interest

The *Compliance* Department shall be responsible for maintaining an up-to-date record of Conflict of Interest declarations, which must include the resolutions adopted in each case.

Likewise, the Compliance Department must monitor and supervise the implementation of the respective measures adopted by the appropriate parties, in accordance with sections 5.2 and 5.3 above.

It is important to note that the Compliance Department, for the purpose of evaluating and/or resolving a Conflict of Interest, may always request additional or clarifying information from the SQM employees involved, who shall be required to provide it as soon as possible.

6. Effective Date and Updates

This procedure shall enter into force on the date of its publication in the SQM Policies and Procedures Library (<http://www.sqm.com/politicas>) and shall be valid as of that date.

This policy does not exempt from compliance with other obligations, disqualifications, incompatibilities, or prohibitions that may be set forth in current national legislation.

7. References

- Code of Ethics
- Anti-Bribery and Anti-Corruption Compliance Policy
- Free Competition Policy
- Code of Conduct for Business Partners
- General Procedure for Establishing Business Relationships with Third Parties
- Compliance Procedure for Third-Party Intermediaries
- Procedure for Business Courtesies
- Global Procedure for Internal Investigations and Sanctions

Responsible Department	Approved by
Ethics and Compliance Department	Board of Directors