

## COMPLIANCE POLICY



M4TS LLC.  
16192 Coastal Highway,  
Lewes, Delaware 19958  
United States  
Phone: +13025202693  
Web: <http://www.m4ts.com>  
Complaints: [compliance@m4ts.cl](mailto:compliance@m4ts.cl)  
<http://m4ts.com/compliance>



*"Honesty is the best policy"*

Benjamin Franklin



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## 1.- Purpose of the Anticorruption Policy.

M4TS SpA is committed to conducting its business with honesty, integrity, trustworthiness and responsibility. This has been a consequence of the inheritance received since our founding in 2016 and is the core of our Code of Business Conduct and Ethics.

Our Policy is clear: All Employees, Directors, members of the Board of Directors, and others acting on behalf of M4TS SpA, may not pay bribes or try to improperly influence any other person in any other way:

- either in the public sector or in the private sector
- even if such payment is requested and its status as a bribe is denied.

This is applicable, if and only if, an improper payment is made directly through an employee of M4TS SpA or through a third party, such as agents or representatives, vendors, customers, partners, or other service providers.

## 2.- This Policy is applicable to all M4TS SpA personnel.

This Policy is applicable to all employees of M4TS SpA regardless of where they are located. All M4TS SpA employees are responsible for complying with this Policy in the performance of their duties on behalf of the Company.

The Management of M4TS SpA is responsible for ensuring that the employees under its supervision and authority comply with this Policy.

Management has conferred compliance responsibilities on some employees. Compliance staff will assist M4TS SpA employees to understand and comply with this Policy and will take the necessary steps to maintain and carry out an anti-corruption program, however, responsibility for compliance will continue to rest with M4TS SpA employees.

3.- M4TS SpA strictly prohibits bribery and corruption of all kinds related to the company's professional activity. M4TS SpA employees discovered participating in a bribery or corruption case will face disciplinary action up to and including termination, or may face civil penalties.

### **All forms of bribery and corruption are prohibited**



Bribery occurs when benefits (things of value) are provided directly or indirectly to individuals, including public officials, business partners, clients or prospects for their personal gain, in order to influence their actions or decisions regarding their official positions or of the company.

Sometimes bribery is obvious, but there are cases where it is very subtle. The employees of M4TS SpA have the responsibility to recognize the alerts indicating a possible case of bribery or corruption and to respond appropriately by following the provisions of this Policy.

On December 2, 2009, Law No. 20,393 was published in Chile, which establishes the criminal responsibility of legal persons and State companies for the commission of the crimes of money laundering, financing of terrorism and bribery of public officials. national or foreign.

Current law prohibits bribery and corruption for both public officials and private persons. When dealing with public officials, M4TS SpA employees should pay special attention, as the consequences in corruption cases related to the public sector and the people involved can be especially harsh for the company.

- What kinds of benefits can be considered "things of value"?

"Things of value" is a broad concept, and can include cash, cash equivalents (eg gift cards), meals, entertainment, travel, gifts, employment, contracts, services in kind; such as carrying out repair work in someone's home, or any other type of goods or services with tangible economic value.

- Who are considered official officials?

Public officials are widely covered by anti-corruption laws. They include:

- Heads of State, Ministers and other political positions; Civil officials;
- Other employees hired full or part time by the Government; Private citizens with some public position;
- Security personnel (military, police, intelligence agents); Judges and legislators;
- Directors and employees of state-owned or state-controlled companies (for example, a state oil company or an airline); Y
- Employees of other public institutions, including universities, laboratories, hospitals and the like.

The fact that a certain Country does not consider a person as a public official under local law does not mean that other applicable laws do not consider him as such. Compliance staff are there to provide additional guidance when in doubt.

They are also considered employees of private companies of any level of hierarchy linked to the development of the business of M4TS SpA

## **Eligible Expenses**

M4TS SpA recognizes that gift giving, entertainment and sponsorship are a legitimate part of business in many countries. However, it is understood that it is the responsibility of M4TS SpA to follow the Gifts, Entertainment and Sponsorship Policy, as these activities may be considered corrupt practices in some cases. The M4TS SpA Gifts, Entertainment and Sponsorship Policy explains when these expenses are eligible and when they are prohibited, as well as the controls applied to them.

4.- Facilitation payments are not allowed.

- What are facilitating payments?

“Facilitation payments” is a term that is used differently around the world. In some countries, a facilitation payment is a euphemism for bribery. In others, such as the FCPA (Foreign Corrupt Practices Act in the US), it is a perfectly defined term that refers to certain streamlined, or “oiled” payments, that, although they are not illegal, they must be adequately controlled and recorded in the company's books.

Facilitation payments are illegal under the laws of most countries in the world. In line with its Policy of compliance with all applicable laws, M4TS SpA does not allow facilitation payments. If you are asked to make a facilitation payment, you must decline to do so.

It is not allowed to make such payments in the performance of professional tasks for the company, even if they are made in charge of personal finances and reimbursement of the same is not sought.

#### 5.- Company resources cannot be used for political contributions and activities.

The use of company funds, property or other resources to make contributions or offer things of value to political candidates, political parties or party members is not permitted. The company will not reimburse any employee for any personal contribution made for political purposes. Everyone is free to participate in Political activities in their free time and at their own expense, as long as this does not interfere with the performance of their duties at M4TS SpA and does not do so on behalf of the company. In addition to being prohibited by Company Policy, such payments can raise issues with the anti-corruption program.

#### 6.- Contributions to charities and event sponsorships require special consideration.

M4TS SpA is committed to serving the communities in which it operates. To that end, M4TS SpA employees may sponsor events or make contributions to charities for educational, social or other legitimate business purposes. Anti-corruption laws do not prohibit legitimate donations and sponsorships. But we have an obligation to ensure that funds allocated for such purposes are used for their intended purpose and are not diverted and also that they reach the appropriate recipients and purposes. This Policy covers contributions and sponsorships of events to known charities for legitimate business purposes that are modest in number and pose no special issues. They can be carried out without prior approval.

Some examples of appropriate contributions are: a donation to the Red Cross to help with relief operations, for example.

Contributions and sponsorships of events that may create special concerns require the prior approval of the General Management of M4TS SpA.

What are "special concerns"? Some examples are:

- When the charity or event is suspected or thought to be closely linked to a public official, a government entity, or a close family member or business associated with a public official or entity linked to the State of Chile.
- The donation or sponsorship has been requested by a public official.
- The charity or event organizers are not transparent regarding the use of funds.

- The entity requesting the funds is not an established organization or The known.
- charity or event organizers request that the Any other fact or circumstance contribution is made in cash or to a third party account.
- that leads you to wonder about whether the contribution will be used properly.

What is a "modest" amount? M4TS SpA employees are expected to use good judgment in this regard, but contributions below CLP \$ 100,000 will generally be considered modest. In considering whether a contribution or sponsorship is modest in amount, the frequency of contributions and related amounts will be taken into account. Employees of M4TS SpA may not subdivide a contribution into smaller amounts to make the contribution appear modest.

7.- M4TS SpA strictly prohibits its employees and collaborators from requesting compensation of any nature from a supplier company of M4TS SpA with the aim of favoring, influencing or directing a Purchase Order to such company.

8.- A reliable record of the accounting books must be kept.

We are characterized by honesty and trustworthiness in all areas of our company. M4TS SpA is required by law to keep complete and accurate books, records and accounts. Expenses must be fully and accurately described in all business documentation, not only in terms of the amounts of the expenses, but also in terms of their nature or destination. You should never create any false or misleading records, or accept a record from any provider or third party that does not meet our requirements. All business information, including business and financial transactions, must be disclosed in a timely and accurate manner.

Financial information must reflect actual transactions and conform to generally accepted accounting principles. All persons are prohibited from establishing undisclosed or unrecorded funds or assets.

9.- It is mandatory to report blackmail and extortion cases

Even if you are asked for improper payment by a public official or other person (for example, a potential customer), that is not an excuse for violating this Policy. M4TS SpA employees must decline such request or request and immediately report any attempted blackmail or extortion to the Chief Legal Officer or Global Ethics Officer.

Bribery attempts should be politely but forcefully rejected. It is necessary to avoid that the answers give the impression of agreement. The applicant must be made aware that M4TS SpA has strict policies and that job continuity and its consequences are put at risk as annotations in the competent official bodies such as the Labor Directorate if we engage in conduct that violates the established policies.





10.- We demand the same behavior from our business partners.

The M4TS SpA Policy prohibits bribery and corruption either directly or indirectly. In some countries, hiring well-connected agents or "seekers" to help identify and pitch new business, to introduce individuals, or to pressure public officials is common practice. This can become a channel for bribery. We expect our agents, consultants, joint venture partners, or any other third parties acting on our behalf ("business partners") to perform legitimate services, and adhere to standards of ethical and professional conduct, as set forth. described in this Policy.

What are the alerts for business partners?

Warning signs ("alerts") are facts or circumstances - a specific pattern, practice or event - that indicate the possibility of corruption. There are many examples of alerts, and the following list **DO NOT** Includes all that may arise.

- A new business partner is recommended by a public official.
- A public official or someone close shows a business interest in a business partner.
- The partner has no experience in performing the work for which he has been hired or has been hired solely because of his influence before a public official.
- The business partner makes suspicious statements (for example, "don't ask questions, I'll take care of everything"), is not transparent in his actions, or insists on keeping his dealings with the Company secret.
- The business partner's commission or markup is very high compared to industry standards or the type of work they will perform.
- The business partner wants to be paid "under the table", in the account of a third party, or even an account abroad, so as not to generate "noise".
- The partner refuses to sign a contract with anti-corruption guarantees.
- The business partner submits false invoices or refuses to provide documentation proving the invoice expense or other declared expenses.

If you identify an alert, please contact Management, Management of M4TS SpA. Through <http://m4ts.cl/compliance> or write us to [compliance@m4ts.cl](mailto:compliance@m4ts.cl)

It is important to consider that we can be held responsible for the conduct of our business partners.

M4TS SpA can become legally responsible for the conduct of a business partner, when the fact takes place in the performance of their professional duties for the company.

A partner cannot be asked to provide services for the company without proper due diligence and without an agreement that contains the necessary anti-corruption safeguards.

Business and financial due diligence is not enough. Due diligence must take into account the reputation and integrity of a potential business partner, as well as the extent of its internal controls to prevent abuse.

Deliberately ignoring signs of corruption, with your eyes closed - can have the same consequences as when you have overt knowledge of dishonest behavior.

Some examples of inappropriate behavior:

- "I don't want to know how you will get approval from the Government, or from the company ... get it and quickly."
- "I'm not going to ask you anything because I don't want to know the answer."
- "I know there is a lot of corruption in this country, so I will not ask our agent how he deals with the local authorities."

Once an alert has been identified, it must be reported to management, direction or through the form at <http://m4ts.cl/compliance> or by mail [compliance@m4ts.cl](mailto:compliance@m4ts.cl) who will assess the risk and determine if adequate safeguards can be implemented to reduce those risks to an acceptable level.

Our responsibilities when working with business partners

Due to the potential liabilities associated with collaboration with business partners, there are a number of measures in place to protect M4TS SpA.

- Due diligence must be documented and kept in an open file for the business partner, which will be kept in the Director's office and must be updated periodically, at least every two years.
- Business partners should not be asked to provide services without a contract. Contracts help demonstrate the legitimate reasons why a partner (or the contracted entity) was hired and the services those business partners provide. Also, contracts normally contain

Provisions to help protect M4TS SpA. Therefore, they are of vital importance.

- Employees must also ensure that compensation paid to a business partner represents an appropriate value based on the legitimate assets or services provided. Payments to business partners should not be made in cash, to someone other than the contract counterparty, or at a location that has no connection to where the partner is based or where the contract activities take place, such as a tax haven or off-shore companies.

Our responsibilities do not end once a business partner has a contract. We must constantly monitor the activities of our partners. The Global Ethics Compliance Officer should be informed of alerts or other concerns about the correctness of a partner's conduct that arise in the course of the relationship with that partner so that risks can be weighed and appropriate safeguards developed.

Some examples of problems that could arise in the conduct of a business partner:

- The business partner requests additional compensation when there is no legitimate need.
- It is known that a public official, or a close relative or a partner of a public official, has an interest in a partner of the company.
- There are rumors that a partner is under investigation for civil lawsuits, money laundering or some other criminal activity.

M4TS SpA can carry out business partner training, audits or seek compliance certifications where relevant.

M4TS SpA encourages its employees to share this Anti-Corruption Policy with their business partners so that they are aware of their commitment to legal and ethical business practices.

11.- We do not help clients with inappropriate behavior.

M4TS SpA employees working for a client must not be tempted by improper payments or other dishonest conduct. Employees faced with a situation that raises these types of concerns should discuss it with their supervisor as soon as possible.

Do not try to solve these kinds of problems on your own.

12.- Due diligence is necessary in merger and acquisition activities.

In the event that M4TS SpA participates in acquisitions of other companies. With the acquisition of another company, M4TS SpA may become liable for the prior conduct of that company. M4TS SpA can also be held liable for continuing conduct that violates anti-bribery and anti-corruption laws.

Therefore, the Company's Policy contemplates that, before closing an acquisition, due diligence is carried out against corruption that allows it to identify and mitigate risks. In addition, the Company will incorporate the acquired Company Policy in its internal controls and in its compliance program as soon as possible, including through the training of new employees, the review of relationships with third parties, and the performance of audits, as appropriate. The employees of M4TS SpA are obliged to cooperate in any of these actions.

13.- Information and non-retaliation.

All M4TS SpA employees who have knowledge or suspect that this Policy may have been violated must:

- Notify Management, Address through the form on our website: <http://m4ts.cl/compliance> or email: [compliance@m4ts.cl](mailto:compliance@m4ts.cl)

The identity of the informants on a violation or suspected violation of the Company Policy will be kept confidential, except to the extent necessary for the protection of the interests of M4TS SpA or as required by the law in force.

The Company will not tolerate retaliation against persons who report in good faith, as stated in the M4TS SpA Anti-Retaliation Policy.

Anyone who has knowledge of what they believe to be a form of retaliation should report it to Management.

#### 14.- Disciplinary measures.

Employees who violate this Policy will be subject to disciplinary action, which may include termination and may also face civil penalties.

fifteen-. Implementation.

M4TS SpA has several mechanisms to ensure the proper implementation of the Anti-Corruption Policy, as well as to prevent, detect, investigate and punish cases of corruption, including:

- M4TS SpA has a communication channel with the Management for Workers and third parties [compliance@m4t.cl](mailto:compliance@m4t.cl), to carry out, in good faith, confidentially and without fear of reprisals, inquiries or notifications of breaches of the Code of Ethics and the Anti-Corruption Policy

(complaint line **anonymous** available on the intranet and on the company's website - <http://m4ts.cl/compliance/>).

- M4TS SpA has procedures for reviewing the background of clients and suppliers, to know and analyze the counterparties with which companies operate and thus assess the associated corruption and reputational risks.

- M4TS SpA will periodically require all its Workers to formally state that they know and comply with the Principles established in the Anti-Corruption Policy.

- M4TS SpA will periodically disseminate the content of the Anti-Corruption Policy to all its Workers through informative actions and training sessions.



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<http://m4ts.com/compliance>

M4TS SpA.  
Callao 2970 - Office 704 Las  
Condes - Santiago - Chile  
Tel: 56-2-2234.4418 / 56-2-2246.4361  
Web: <http://www.m4ts.cl>  
Complaints: [compliance@m4ts.cl](mailto:compliance@m4ts.cl)  
<http://m4ts.cl/compliance>