



GENERAL POLICY ON REGULAR OPERATIONS

EMPRESAS CMPC S.A.



At the Board meeting held on August 1, 2024, the following Policy was approved regarding Related Party Transactions that are Ordinary and Customary to the Corporate purpose of EMPRESAS CMPC S.A. (from now on also and alternatively, the "Corporation" or the "Company"), which will become effective on September 1, 2024.

AVAILABILITY AND DISCLOSURE

COMPANY WEBSITE	ADDRESS OF THE COMPANY'S OFFICES
https://www.cmpc.com/politicas-y-normas-corporativas/	AGUSTINAS N° 1.343, SANTIAGO, CHILE

Chapter 1 **Introduction**

1.1. OBJECTIVE

EMPRESAS CMPC S.A. and its divisions must comply with the regulations on related party transactions outlined in Title XVI of Law No. 18,046 on Corporations (the "LSA") and its regulations, Law No. 18,045 on the Securities Market (the "LMV"), and the rules, circulars, and instructions issued by the Financial Market Commission ("CMF").

This Policy determines the Company's related party transactions, which, being ordinary in consideration of the Business, may be executed with associated parties without the requirements and procedures established in Article 147 of Law No. 18,046 on Corporations.

1.2. RECIPIENTS

This Policy applies to EMPRESAS CMPC S.A. and its (i) directors, (ii) managers, (iii) senior executives, (iv) liquidators, and (v) divisions, regardless of their legal nature, who must strictly comply with its rules.

Each division shall keep a record of all related party transactions it enters into, indicating the parties involved, date of approval, date of execution, purpose of the transaction, and amount involved.

1.3. CORPORATE PURPOSE OF EMPRESAS CMPC S.A.

For this Policy, it is hereby stated for the record that the Company's corporate purpose is to make and sell paper and boxboard, and related raw materials and items; import and export paper pulp, paper, and similar products of derivations therefrom, as well as the forestation and use of rural plots in general, selling forestry products and electricity; making and selling chemical products; the establishment, acquisition, use and transfer of mineral deposits and transportation activities, whether by land or sea.

The acquisition, installation, and operation of industries related in any way to any of the activities above and the constitution or incorporation of companies or other entities of any nature related to the objectives of the corporate purpose are also objects of the Company.

1.4. JUSTIFICATION FOR THE NEED TO HAVE A POLICY

In accordance with the Board of Directors of the Company, the specific reasons that make it necessary to have this Policy, given the particular circumstances of the Company, lie in the need to have a procedure that allows agility in the execution of certain transactions, typical of the line of business as usual, as part of the necessary dynamics of its business and operational considerations of operation.

1.5. DISCLOSURE MECHANISMS

The Policy is permanently available to the company's shareholders at its headquarters and is duly published on the Company's website.

Concerning related party transactions, Empresas CMPC S.A. publishes the information required by the CMF to be disclosed to shareholders and the public in general.

1.6. MODIFICATIONS AND REVISIONS

This Policy may be modified by resolution of the Board of Directors, with the approval of the Directors' Committee, which will be reported to the Financial Market Commission (CMF) as a material fact when appropriate. In addition, all updates shall be made available to the shareholders through the mechanisms indicated in paragraph 1.5 above.

This Policy shall be kept up to date and be reviewed periodically by the Board of Directors as deemed necessary.

Chapter 2

Customary Policy for Related Party Transactions

2.1. OBJECTIVE

In compliance with the provisions of Article 147 of the LSA, Empresas CMPC S.A., in its capacity as a publicly traded company, hereby establishes the following general Policy regarding the regularity of related-party transactions in order for the Empresas CMPC group may carry out the transactions described herein, without the need to comply with the requirements and procedures established in paragraph 1) to 7) of the first paragraph of Article 147 of Law No. 18,046.

2.2. CONTRIBUTION TO CORPORATE PURPOSE

The company's Board of Directors considers that the related party transactions (“RPTs”) described in items ix. to xi. of paragraph 2.4 below are part of the corporate purpose and contribute to the corporate interest. They are also necessary for the normal development of the Company's activities in the exercise and fulfillment of its business, which justifies their inclusion in this Policy.

2.3. ORDINARY NATURE

The RPTs described in items i. to xi. of paragraph 2.4 above

- i. Shall: Have terms and conditions similar to those previously entered into -with the same or other related parties or with unrelated third parties- in consideration of the market conditions prevailing at the time of their execution.
- ii. Be recurrent and, therefore: (i) have been entered into at least once every 18 months during the last three years, or (ii) have been entered into under a successive tract, deferred performance, or automatic renewal contract; and
- iii. Not to have a relevant effect on the company's economic, financial, or legal situation.

2.4. EXCEPTIONS TO THE PROCEDURE ESTABLISHED FOR RPT

The following Related Party Transactions (RPT) may be executed without the requirements and procedures established in paragraphs 1) to 7) of the first paragraph of Article 147 of Law No. 18,046, provided that (i) they are included in the annual budget prepared from the operation and submitted for approval, (ii) reported to the Company Directors Committee, and (iii) previously authorized by the Board of Directors. The foregoing, without prejudice to having to comply with the nature of ordinary and contribution to the corporate purpose, as described in paragraph 2.2. and 2.3 above.

Maximum amount per transaction: The Board of Directors agrees that the maximum amount per transaction to qualify under this Policy must be less than 1% of the Company's consolidated assets for the immediately preceding fiscal year. In any case, and by current regulations, the amount may never exceed 10% of the Company's assets.

- i. Such as the purchase and sale of wood, wood products, paper pulp, paper, tissue products, and paper products, as well as administrative services to the customers and suppliers in the countries where CMPC operates, as well as exporting and importing.
- ii. Acquiring raw materials and other inputs and supplies necessary for running the Corporation's businesses.
- iii. Acquiring and renting goods as well as hiring staff and services needed for developing, operating, and maintaining the Corporation's assets.
- iv. Contracting for consulting services on matters connected to producing, distributing, selling, and marketing the Corporation's products; contracting for projects and studies in engineering, environmental, and other specialties for developing, operating, and maintaining the Corporation's assets and other services that are ancillary to the above.
- v. Contracting for services and purchasing the goods needed for studying, developing, and building industrial factories, as well as any activities needed for the above.

- vi. The execution of banking and financial operations of any kind, such as the execution of mercantile current account contracts, fixed or variable income financial investments, time deposits, overdraft lines, credits with and without promissory notes and letters of credit, guarantee service contracts and issuance of corporate guarantees (nominee and unnominated), foreign exchange market operations (money markets), purchase and sale of foreign currencies, financial derivatives, swaps, agreements, stand-by letters of credit, forward contracts, rate hedges, options and futures, centralized cashier's contract operations or others entered into for the optimization of cash management, structured loans and/or financial loans or other equivalent operations, related to the Company's current accounts or other regular financial operations carried out by the money desk; as well as all other activities necessary for the efficient administration of the Company's liquid resources.
- vii. The execution of foreign exchange operations such as buying and selling currencies in the market, remitting currencies abroad, and holding currencies maintained in or received from abroad.
- viii. The execution of transactions to finance the Company's investments and to finance its working capital, either by contracting loans governed by Law No. 18,010 or by placing debt instruments in the domestic or international markets.
- ix. Contracting consultants on financial, accounting administrative, tax, and legal matters
- x. The hiring of publicity services.
- xi. Contracting for consultation and services, as well as acquiring assets, goods, and inputs needed to run the offices and equipment for managing the Corporation.

Notwithstanding the maximum amount per transaction indicated above, if the Company's Board of Directors determines that this amount may exceed (i) 1% of the company's assets or (ii) 10% of the total revenues, either individually or consolidated, for the immediately preceding fiscal year, the reasons justifying this possibility, in the opinion of the Board of Directors, must be stated during the meeting where the Related Party Transaction (RPT) is approved.

In the case of framework agreements for the transactions indicated in items i. to xi. above, they must also be reviewed and approved by the Company's Directors' Committee prior to their execution. Particular transactions under such framework agreements may be carried out in compliance with the provisions of this Policy, if applicable.

Regarding the transactions specified in items i. to xi. Regarding the transactions specified in items i. to xi. above, the Board of Directors may grant a general authorization under which it will not be necessary for the Board to make specific decisions about each exempt transaction. However, the Board may choose to do so if deemed appropriate and must report it as a material fact when required.

Nonetheless, this Policy may not authorize the execution of acts or contracts that commit more than 10% of the company's assets, as determined by the most recent financial statements submitted to the CMF.

Chapter 3 **Implementation and Control**

3.1. REGULATORY MECHANISMS

In accordance with Article 172 of the LSA Regulations, even those Related Party Transactions (RPT) exempt from the approval procedure established in paragraphs 1) to 7) of the first paragraph of Article 147 of Law No. 18,046 must (i) aim to contribute to the social interest, and (ii) be aligned in price, terms, and conditions with those prevailing in the market at the time of their approval. Additionally, the RPTs conducted under this Policy must strictly comply with the requirements and procedures set forth herein.

To comply with the requirement of item (i) above, if possible, depending on the circumstances of the transaction in question, there must be a report from the respective Business Management or the approval of the Manager responsible for such area or process verifying the need and convenience for the Company to carry out the contracting and the regularity of the transactions within such framework in accordance with its line of business. To comply with the requirement of item (ii) above, if possible, depending on the circumstances of the transaction in question, bids must be made, or additional formal quotations or a report from the respective Management if there are no additional suppliers to the related one, and such information must be retained and be available for review during the entire term of the respective transaction.

The control measures that the Company has established to verify compliance with legal and regulatory provisions related to Related Party Transactions are detailed in the document titled Procedure for the Handling of Transactions, which is considered part of this Policy.

3.2. IMPLEMENTATION AND COMPLIANCE

The Administration and Finance Manager will be responsible for implementing this Policy, dictating the eventual procedures and having the necessary controls for its adequate execution, including especially the verification of the control mechanisms mentioned in paragraph 3.1. The Administration and Finance Management, in coordination with the Compliance Management, shall take the necessary measures and actions to train the Company's employees on the content of this Policy and its compliance.

The Corporate Legal Department must resolve any doubts regarding the proper application of this Policy.

To fulfill the function of overseeing compliance with this Policy, the Administration and Finance Manager enjoys adequate independence, which prevents his or her actions and/or decisions from being influenced by interest groups, thus ensuring that they are consistent in the assignment and have the sole objective of strictly complying with this Policy. The Administration and Finance Manager shall report to the Board of Directors or Directors' Committee, as appropriate, whenever necessary under this Policy, and in any event, at least monthly at each regular meeting of the Directors' Committee.