




CORPORATE POLICY

PREVENTION OF CRIME AND CORRUPT PRACTICES

(Chilean Law No. 20,393 - Foreign Corrupt Practices Act and other Anti-Corruption Laws)

Version	Description of changes	Approval	Validity
1.0	Initial version	Board of Directors	May 2014
2.0	Section 7 is amended	Board of Directors	October 2017
3.0	New crimes are incorporated into Law No. 20,393 and the FCPA Guide.	Miguel Ángel Peirano	March 2021
4.0	Updated in accordance with amendments introduced to Law 20,393 by Law 21,595 on Economic Crimes.	Board of Directors	August 2024

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1. Objective

The purpose of this document is to establish the guidelines on which the adoption, implementation and operation of the Crime Prevention Model of Embotelladora Andina S.A. (hereinafter the "Crime Prevention Model") is based.

2. Scope


The scope of this policy and the Crime Prevention Model is corporate in nature, and includes all those who hold a position, function or office, including, but not limited to, directors, senior management, representatives, executives, and employees of Embotelladora Andina S.A. and its subsidiaries, and its third party contractors (hereinafter and collectively referred to as "Embotelladora Andina S.A." or the "Company").

It is also applicable to individuals or legal entities that provide services managing the Company's affairs to third parties, with or without their representation, and to legal entities with which there are ownership or participation relationships, and that lack operational autonomy with respect to Embotelladora Andina S.A.

3. Principles and guidelines of the Crime Prevention Model

- 3.1 Embotelladora Andina S.A. will guarantee the preservation of a model of organization, administration, and supervision that is sufficient to prevent the commission of offenses and corrupt practices as defined in all applicable laws and regulations, collectively referred to as the "Anti-Corruption Laws."
- 3.2 The Board of Directors of Embotelladora Andina S.A., the office of the Chief Executive Officer, General Management and Corporate Management, the boards, councils and General Management of its subsidiaries, and the Crime Prevention Officer will be responsible for the adoption, implementation, administration, updating and supervision of the Crime Prevention Model.
- 3.3 The Human Resources departments are accountable for conducting continuous training sessions for all employees of Embotelladora Andina S.A. regarding this policy and its objectives. The Crime Prevention Model, the roles and responsibilities that result from it, and the penalties for non-compliance will be disseminated in these areas. The Crime Prevention Officer will be supported by the entire Company's management, with a particular emphasis on their respective Human Resources departments, in order to fulfill his/her obligation.

4. Components of the Crime Prevention Model

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The Crime Prevention Model of Embotelladora Andina S.A. has the following components:

4.1 Criminal Risk Matrix

It is the management and control tool that identifies processes and activities, the potential crimes associated with each risk scenario, and the protocols and procedures for the prevention and detection of crimes in accordance with each identified process or activity.

4.2 Policy

The Policy establishes the guidelines on which the adoption, implementation, administration, updating and supervision of the Crime Prevention Model is based.

4.3 Code of Ethics and Business Conduct


The Company's Code of Ethics and Business Conduct establishes a framework of conduct regarding the daily challenge in the business, which is based on transparency, integrity, compliance with applicable laws and making good business decisions. In this sense, it establishes a control environment regarding activities that could expose the Company to legal and/or criminal liability.

4.4 Other policies and procedures

The Company has corporate policies and procedures for the prevention and/or detection of criminal conduct in the context of its activities. All policies and procedures that establish definitions, regulations and controls for the Company's activities must be duly documented, disseminated and made available to all personnel who may be affected by them.

4.5 Anonymous complaints channel

The Anonymous Whistleblower Channel is a comprehensive, confidential, online reporting tool that assists the company in addressing fraud, abuse, and other malpractices or illegal activities that may occur within the company, including non-compliance with the Prevention Model, while fostering a positive corporate culture. A reporting tool has been made available to Andina's employees and any third party with a relationship to the Company who believe it is necessary to report an inappropriate practice or situation. The Company guarantees that individuals who report in good faith will not be subject to retaliation.

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4.6 Sanctions

Failure to comply with this policy, as well as the policies and procedures to prevent and detect the commission of crimes, may result in disciplinary action of those considered in the Internal Regulations for Order, Hygiene and Safety, which, depending on the circumstances of the matter, may include dismissal or termination of employment. Disciplinary action shall also apply to supervisors, managers and senior executives who, in relation to the employees under their supervision:

- Know or become aware that such employees are seriously considering conduct that is prohibited by the Anti-Corruption Laws or constitutes a criminal offense and not take any action to prevent it; or
- Know or become aware that such employees have engaged in conduct that is prohibited by the Anti-Corruption Laws or constitutes a criminal offense and fail to take appropriate corrective action.

In addition to Company disciplinary actions, some violations may be serious enough to result in civil or criminal penalties against violators.


4.7 Contract Clauses

Clauses that establish obligations and prohibitions regarding anti-corruption laws and the Crime Prevention Model must be included in employment contracts with our own staff and contractors, including senior executives, suppliers, or service providers, particularly for those who provide services to third parties that manage the Company's affairs. Texts to be incorporated into the corresponding corporate and local documents will be approved by the legal department of the Company.

4.8 Responsible Parties

An officer with the title of Crime Prevention Officer will be responsible for the application, supervision, and updating of the rules established in the Crime Prevention Model of Embotelladora Andina S.A. Such an officer shall be appointed by the Board of Directors of Embotelladora Andina S.A. and shall continue in office until the Board of Directors revokes his appointment.

Article 4 N° 3 of Law No. 20,393 formally assigns the responsibility for the implementation of the crime prevention protocols to the Crime Prevention Officer. For these purposes, he possesses sufficient independence, effective powers of direction and supervision, and direct access to the Company's management to provide timely updates on the measures and plans that have been implemented in the pursuit of its mission, to account for its management, and to mandate the

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adoption of measures that are essential for the Company's mission but may exceed its competence. The resources and material and non-material means required to effectively execute its responsibilities will be provided. Nevertheless, additional individuals may be appointed to oversee the implementation of protocols and procedures for the prevention and detection of criminal activity, and they will possess the same authority and means as previously mentioned.

The Crime Prevention Officer will fulfill his responsibilities by collaborating with management to establish the methods for the effective application of the Crime Prevention Model and its supervision.

The Crime Prevention Officer will be granted the necessary resources and authority by the Board of Directors of Embotelladora Andina S.A. to facilitate the advancement of its activities and functions.

The Crime Prevention Officer will have access to all information pertinent to its scope of action. Similarly, he/she will have direct access to the Board of Directors through the Company's Governance, Compliance and Integrity Committee as a suitable means of reporting on the management of the Crime Prevention Model at least twice a year and when the circumstances of the entity so warrant.


4.9 Periodic evaluations

The Crime Prevention Model takes into account the provision of periodic evaluations by independent third parties and the establishment of mechanisms for improvement or updating in response to these evaluations. Evaluations of this nature must be conducted every two years.

5. Roles and responsibilities

A. Embotelladora Andina S.A. Board of Directors.

- Designate and/or revoke the Crime Prevention Officer's office, as well as other individuals who are responsible for the application of protocols and procedures for the prevention and detection of crimes.
- Authorize the means and resources necessary for the Crime Prevention Officer and those responsible for crime prevention and detection protocols to fulfill their roles and responsibilities.
- Approve the Crime and Corrupt Practices Prevention Policy.
- Ensure the correct implementation and effective operation of the Crime Prevention Model.

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- Receive via the Governance, Compliance and Integrity Committee, on an annual basis, the report on the management developed by the Crime Prevention Officer, and approve the planning for the following period.
- Inform the Crime Prevention Officer of any observed situations which relate to non-compliance with Anti-Corruption Laws, and the procedures related to the Crime Prevention Model.


B. Governance, Compliance & Integrity Committee (the "Committee")

- Approve and supervise the Compliance Plan proposed by the Crime Prevention Officer, and may propose modifications and plans for its improvement.
- Approve and supervise the Company's Ethics Program, and may propose modifications and improvement plans for the program.
- Oversee the Company's compliance with applicable laws and regulations.
- The Committee shall receive a monthly report from the Crime Prevention Officer on the complaints and claims received through the Company's Complaints Channel in accordance with the provisions of the Corporate Procedure for the reception, treatment, and investigation of complaints. They will be reported, and, if necessary, the corresponding investigation will be conducted.

C. Chief Executive Officer and Corporate Managements

- Ensure the proper implementation and effective operation of the Crime Prevention Model, both at the Company and area of responsibility levels.
- Support the Crime Prevention Officer by ensuring that information and individuals are accessible without restriction, as well as by assisting in the coordination of the Prevention Model's activities in the designated areas.
- Contribute to and promote the dissemination of the Prevention Model throughout the organization.
- Notify the Crime Prevention Officer of any situation that is observed in relation to non-compliance with the Anti-Corruption Laws, as well as the steps associated with the Crime Prevention Model.


D. General Management and direct reports

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- Ensure the proper implementation and effective operation of the Crime Prevention Model, both at the Operation and area of responsibility levels.
- Support the Crime Prevention Officer by ensuring that information and individuals are accessible without restriction, as well as by assisting in the coordination of the Prevention Model's activities in the designated areas.
- Contribute to and promote the dissemination of the Prevention Model throughout the organization.
- Notify the Crime Prevention Officer of any situation that is observed in relation to non-compliance with the Anti-Corruption Laws, as well as the steps associated with the Crime Prevention Model.

E. Corporate Compliance and Ethics Officer

- Exercise the role of Crime Prevention Officer in accordance with the powers defined for the position by the Board of Directors of Embotelladora Andina S.A.
- Determine, together with the Board of Directors of Embotelladora Andina S.A., the means and resources necessary for the individual in charge and other potential individuals responsible for the protocols and procedures for the prevention and detection of crimes to fulfill their roles and responsibilities.
- Provide a report to the Committee and the Board of Directors of Embotelladora Andina S.A. as necessary.
- Propose to the Committee the development and implementation of any additional policy and/or procedure that it considers necessary to complement the current Crime Prevention Model.
- Evaluate the effectiveness of the adopted Crime Prevention Model and its compliance with laws and other regulations, informing the Committee and the Board of Directors of Embotelladora Andina S.A. regarding the need and convenience of its modification.
- Ensure the updating of the Crime and Corrupt Practices Prevention Policy, in accordance with regulatory changes and the business environment of Embotelladora Andina S.A.
- Intervene, when appropriate, in the lawsuits, complaints or legal proceedings that Embotelladora Andina S.A. decides to undertake, in relation to the offenses set forth in Law 20,393 and in the other Anticorruption Laws applicable to the Company, and provide

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all the background information in its possession or of which it has knowledge as a result of its position.


- To perform special tasks that the Committee or the Board of Directors of Embotelladora Andina S.A. may entrust to it in connection with matters within its competence.
- Investigate allegations related to Anti-Corruption Laws, either independently or through third parties, if required by the Governance, Compliance and Integrity Committee, the Board of Directors, or if it considers it needed on its own.

F. All Staff, External Advisors and Contractors.

- Comply with the provisions of this policy, the Code of Ethics and Business Conduct of Embotelladora Andina S.A. and all those policies and procedures related to crime prevention.
- Report, through the designated channels, regarding circumstances that may contravene the provisions of this document.
- Participate in trainings related to crime prevention.

6. Validity

This Crime Prevention Policy shall be effective from the date of its official publication by Embotelladora Andina S.A.

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EXHIBIT

Foreign Corrupt Practices Act (FCPA) Compliance Guide

According to the FCPA Compliance Program Evaluation Guide (FCPA Guide), issued by the United States Department of Justice (DOJ) in conjunction with the Securities and Exchange Commission (SEC), a compliance program is a critical component of a company's internal control and essential to detect, prevent, remediate and report FCPA violations. A compliance program must be tailored to the specifics of the business and the risks associated with it, which are dynamic and evolve with business and market changes.

The DOJ and SEC do not define specific requirements with respect to the compliance program. Rather, they take a common sense and a pragmatic approach to evaluate it, doing research linked to three basic questions:


- Is the company's compliance program well designed?
- Is it applied in good faith?
- Does it work?

According to the FCPA Guidance, the DOJ and SEC expect a company to take specific steps to assess its FCPA compliance risk with respect to ongoing and future business activities.

The degree of formality and complexity of this risk assessment varies according to the size, nature, and complexity of the Company, as well as factors such as:

- the scope of the non-U.S. operations and businesses of the Company.
- the degree of interaction with foreign government agencies (to the United States) and government officials, necessary to conduct the business of the Company.
- the Company's reliance on third parties to assist in such interactions.

According to the FCPA Guidance, the DOJ and SEC, when investigating a company, will ensure that not only is there a clear message against misconduct and that it is not tolerated in the company, but also that the company has policies and procedures, appropriate accountability assignments, including training, incentive systems and disciplinary actions, that ensure that the compliance program is well integrated into the operations of the Company and its employees.

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There are two types of FCPA law violations:

- The anti-bribery provision: it being unlawful to make a corrupt payment (or facilitation payments or anything of value) to a foreign public official (to the U.S.) for the purpose of obtaining or retaining business.
- The provision of books, records, and internal controls: the company must prepare and maintain books and records that accurately and fairly reflect the company's transactions, and establish and maintain an adequate system of internal accounting controls. The FCPA prohibits knowingly falsifying a company's books or failing to implement the company's internal control.

The FCPA Guide states that the company must take measures to ensure that anti-corruption policies and procedures have been communicated throughout the organization, through periodic training and evaluations for all directors, officers, relevant employees and, where appropriate, agents and business partners. Embotelladora Andina S.A. must distribute the aspects related to its Crime Prevention Model.


The FCPA Guide states that Human Resources Management must ensure effective communication of the policies and procedures of the Crime Prevention Model. Such communication should involve all organizations and their staff, including the Directories and/or Top Management Authorities.

The FCPA Guide states that the distribution of up-to-date information on the Crime Prevention Model can be carried out by various channels:

- Corporate Intranet.
- Mass mail.
- Briefings.
- By other means available by the Company.

According to the FCPA Guide, the Company must implement policies and/or procedures that consider the corruption risk when establishing business relationships with third parties (suppliers, distributors, agents, associations, etc.), which they should consider, among others:


- Due diligence procedures prior to the recruitment of third parties, which demonstrate (i) the need to contract; (ii), the associated risks; (iii) their reputation and (iv) potential relations with public officials.
- Perform due diligence procedures for third parties that relate to the company, categorized as high risk (red flag), such as agents or representatives who interact with the government. Also, exclusion of suppliers, in case of due diligence alerts.

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- Implementation of constant monitoring of the third party, with a periodic update of due diligence, supplier training, supplier audits, among others.

In addition, the FCPA Guide states, among other subjects, the following:

- That risk assessment is critical to developing a sound compliance program, so the Company must analyze and address the corruption risks it faces and understand the extent to which they are affected.
- Identifying the fraud risks faced by the company helps to identify the level of risk, the existence of controls to mitigate them, and the proper functioning of existing controls.
- That an effective control program should include a mechanism for an organization's employees and others to report suspicious or actual conduct or violations of Company policies confidentially and without fear of retaliation.
- That the Audit area plays a significant role in fraud risk management efforts. It allows confirming the correct implementation of the elements of the anti-fraud model. Periodically verify and document the functioning of the elements of the anti-fraud program.
- That the Company should have Internal Audit. The functions of the Internal Audit area are mainly oriented to assist in the evaluation of the Company's fraud risk and obtain conclusions regarding mitigation strategies, evaluate the effectiveness of controls, report to the Audit Committee on internal control evaluations, audits, investigations, etc., ensure compliance with the work program, follow up on adherence to the Company's ethical policies, monitoring and audits to detect criminal conduct.
- That the Company should have updated and approved manuals, policies, and procedures, which contemplate the functions and responsibilities of the Internal Audit area in fraud and anti-corruption matters.
- That the Company should have documents that certify that the results of internal audit reviews are reported to the Audit Committee.
- That the Company should use its systems and data to identify red flags in its operations. It should also use such data to prevent, detect and investigate potentially irregular situations, as well as to identify, through the data, opportunities for improvement in internal control.
- That the Company must define the protocols for the operation and functioning of the team that conducts the investigations. Such protocols should ensure that corporate investigations are conducted discreetly, confidentially and with due priority. The zero-tolerance tone of the organization should be supported.

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- That senior management should clearly define the Company's anti-corruption standards ("Tone from the top"), and communicate in clear terms its compliance and its dissemination throughout the organization.
- That the disciplinary procedures established by the Company must consider compliance with the FCPA principles, and that the incentives for compliance with objectives established by the organization cannot be in conflict with any of the FCPA principles mentioned in this document.

With regard to the merger or acquisition of a company, the FCPA Guide considers that the following actions should be performed:

- Perform a due diligence based on FCPA risks and anti-corruption,
- Ensure that the code of ethics and compliance policies and procedures of the acquiring company, with respect to the FCPA and other anti-corruption laws, are applied as quickly as possible to newly acquired companies or merged entities;
- Train directors, officers, and employees of newly acquired businesses or merged entities, and where appropriate, train agents and business partners, on the FCPA and other relevant anti-corruption laws and the code of ethics and compliance policies and procedures of the acquiring company;
- Conduct an FCPA-specific audit of all newly acquired or merged businesses as quickly as possible; and
- Disclose any corrupt payment discovered as part of your due diligence from newly acquired entities or merged entities.

With regard to the supervision of the Board/Committees, the FCPA Guide notes that:

- The Company must have a Board of Directors and Audit Committee.
- The Board of Directors functions should be primarily oriented towards oversight and implementation of controls to mitigate fraud and misconduct risks, as well as setting the "tone from the top" for the Company's fraud and misconduct risk management activities; the Board of Directors should also have fiduciary duties, where they are prohibited from using their position for personal gain and/or are required to exercise good faith and reasonable diligence in monitoring business activities.
- The Audit Committee's functions should be primarily aimed at safeguarding the objectivity of the financial reporting process and internal controls, ensuring the understanding of each role, and obtaining the opinion of the internal auditors, external auditors, and external experts when necessary.


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- The Company must have an approved document containing the rules and responsibilities of the Audit Committee which is governed by the Sarbanes-Oxley Act, as well as a document containing the rules and responsibilities of the Board of Directors.
- The Audit Committee should establish procedures for receiving, retaining, and addressing complaints from employees and others about internal accounting controls or auditing matters; the procedures should address complaints by establishing employee confidentiality and anonymity.

The FCPA Guidance states that the Company must have a duly authorized document setting forth the responsibilities of the General Manager, including, among others, to strengthen the Company's fraud risk management efforts, guide planning, make decisions and evaluate performance, help ensure that resources are made available to enable employees to achieve control objectives, provide a leadership role in the deployment of compliance initiatives and subsequently discuss these at company functions, conduct meetings and speaking engagements, attend employee training to indicate support for the organization's fraud risk management efforts, stay informed of allegations of misconduct, lead by example and address external challenges.

The FCPA Guidelines state that the Company must have a duly authorized document establishing the responsibilities of the Human Resources Manager, mentioning mainly among them: assist the Board of Directors in the development of standards of conduct; assist in the establishment of employee and third party due diligence protocols and enforcement and accountability protocols; assist in the development and implementation of communication and training tools; assist in conducting investigations into suspected cases of fraud and misconduct; assist in monitoring compliance with non-retaliation policies.

The FCPA Guide states that the Company must have a duly authorized document where the responsibilities of each management are established, mainly mentioning among them: Collaborate in the development of standards of conduct; collaborate in the development and implementation of communication and training tools; and help ensure that risk areas in their areas are routinely monitored.

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With regard to the Code of Ethics, the FCPA Guide states, among others, that:

- The Company's Board of Directors must approve the code of ethics;
- The code of ethics must be communicated to employees;
- The code of ethics must be communicated to suppliers and third parties;
- There must be awareness-raising campaigns for the code of ethics and training;
- The Company must have established and approved business values and principles;
- The code of ethics must indicate the values, commitments, and principles with which employees and third parties should be conducted;
- The code of ethics must indicate employee responsibilities;
- The code of ethics informs about compliance with laws, regulations, policies, and procedures;
- The code of ethics must include penalties for non-compliance;
- The code of ethics must point out best practices for the use of company goods;
- The code of ethics must mention the relationship with "customers" and "suppliers";
- The code of ethics must inform about the relationships of respect, security, and equality between the company's staff;
- The code of ethics must mention political and religious activities;
- The code of ethics must refer to the handling of confidential information.


The FCPA Guide states that there should be policies, procedures, processes, and controls in the Company that prevent and contribute to reducing the fraud risk. Such policies, procedures, processes, and controls must be approved by the Board of Directors, Audit Committee and/or Administration.

The FCPA Guide states that policies, procedures, processes, and controls should:

- Be in line with the business model.
- Be communicated through different means to all employees.
- Be communicated through different means to suppliers and third parties.

With regard to policies, procedures, processes, and controls, the FCPA Guide states, among others, the following:


- that the company must frequently run campaigns to spread and train policies, procedures, processes, and controls.
- that policies, procedures, processes, and controls should include definitions and concepts that facilitate their understanding (conflict of interest, fraud, corruption, and collusion).

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- that policies, procedures, processes, and controls should be aimed at maintaining an ethical culture in the Company.
- that must establish the commitment of the organization to enforce such documents.
- that regular evaluations should be carried out on policies, procedures, processes, and controls to ensure their understanding.
- that must include guidelines regarding the segregation of functions that must exist in the Company.
- that should include prevention activities that staff must carry out such as knowledge, understanding and monitoring of the Company's policies and procedures.
- that they must provide examples of unethical conduct that combat these documents.
- that must refer to disciplinary proceedings and sanctions for offenders.
- that must define who is responsible for ensuring compliance with the policies.
- which must state that non-compliance with them must be reported and establishes the responsibility to do so.

The FCPA Guide states that the Company must:

- have a risk area with which to concentrate the risk universe.
- document the risk assessment process.
- periodically update the risk assessment and also in response to major events.
- consider industry fraud risks in your risk assessment.
- determine fraud risks based on your line of business, size, geographic location, organizational structure, systems, policies, among other factors characteristic of the business.
- classify fraud risks. For example, misappropriation of assets; alteration of financial statements, improper revenue recognition, other illegal or unethical conduct that affects the reputation of the business.
- determine inherent risks, existing controls, and residual risk.
- establish periodic tests of its controls to validate their proper functioning.
- determine the likelihood and risk impact.
- obtain appropriate corrective actions to mitigate identified fraud risks where controls are weak or lacking.
- communicate the results of risk and control assessments to the Audit Committee for oversight.
- following misconduct, the Company should examine the fundamental causes (root cause) of the absence/weakness/inefficiency of controls to determine if similar exposure exists elsewhere in the organization.
- apply disciplinary sanctions in an equitable manner to those involved in the misconduct.

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- involve the organization's stakeholders (e.g., the department where the unethical conduct occurred, Internal Audit, Risk, Comptroller's Office, among others) in the development and review of remediation protocols.

The FCPA Guide notes that remediation protocols should define the group(s) and/or department(s) responsible for the design, implementation, and monitoring of remediation measures, as well as the commitment date for this to happen.

Remediation protocols should include, among others:

- adherence to local regulations
- a proposed action plan for remediation of controls
- reporting of the remediation measures to the appropriate parties
- strengthening the identified risk
- communicating the response plan to employees
- a file with evidence of efforts made

The Company will evaluate each case in particular and in this regard will implement the best communication strategy corresponding to the different parties, for example internal (employees, conduct committee, compliance officer, risk area, Directory) and external (customers, suppliers, regulators, external auditors) that the administration took appropriate measures in response to irregular or unethical behaviors, following the analysis of each case.