

# CORPORATE POLICY FREE COMPETITION IN THE MARKETS

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# 1. Objective

In recent years, the countries in which Embotelladora Andina S.A. and its subsidiaries (collectively referred to as "Coca-Cola Andina" or the "Company") have a presence, have expended significant resources and efforts to promote competition in the markets, and discourage the execution of conducts deemed potentially anti-competitive. The objective is to ensure an efficient allocation of resources, technological advancement and social well-being.

This Corporate Policy on Free Competition in the Markets has been implemented in light of the aforementioned circumstances and Coca-Cola Andina's firm conviction that free market competition is a fundamental pillar of its business model.

#### 2. Scope

This Policy applies to all Company personnel, including all employees, officers and individuals responsible for this policy, and in all operations and subsidiaries established in Argentina, Chile and Paraguay (collectively referred to as "Personnel")

# 3. Corporate Policy on Free Competition in the Markets

Coca-Cola Andina's policy is to fully comply with standards governing free competition in the markets, which, in general, penalize those who execute any act, deed or convention that prevents, limits, restricts or hinders free competition or that tends to produce these effects, or that constitute an abuse of dominant position in a market in a way that may be detrimental for the general economic interest.

Consequently, no Company employee or Personnel may engage in acts, deeds or conventions that prevent, restrict or hinder free competition, or have the purpose or tend to produce such effects, including, but not limited to, the following:

- a) Agreements or concerted or consciously parallel practices that involve competitors among themselves, and that consist of collectively fixing or recommending sales or purchase prices, limiting production, distribution or technical development to the detriment of competitors, allocating market zones or quotas or affecting the outcome of bidding processes; as well as agreements or concerted or consciously parallel practices that, conferring market power to competitors, consist of determining or imposing commercialization conditions or excluding current or potential competitors.
- b) Abusive exploitation of a dominant position in the market by fixing purchase or sales prices, imposing on the sale of another product, allocating market zones or market shares, or imposing other similar abuses, such as limiting distribution, technical development to the detriment of competitors, obtaining or attempting to

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obtain under threat of severing commercial relations, prices, payment conditions, sales modalities, payment of additional charges and other conditions of commercial cooperation not included in the general conditions of sale that have been agreed upon.

- c) Predatory pricing or unfair competition practices (as applicable in the countries to which this policy applies), designed to achieve, maintain or increase a dominant position, or exclude competitors from the market.
- d) Participation in relevant executive or director positions in two or more competing companies at the same time, unless the individual falls under any of the applicable legal exceptions.

# 4. Personnel and Company Obligations

- Promote the Company's products in a positive way at the points of sale, highlighting the brands, their reputation and good service.
- Respect the freedom of points of sale to decide to display and sell products from competing brands.
- Follow the Company's instructions regarding the communication and implementation of any measure taken to comply with this policy at the point of sale.
- In case of any doubts in this regard, consult with your superiors or with the Company's legal department.

### 5. Personnel and Company Prohibitions

- Impose exclusivity on its relationships with points of sale. The foregoing shall not imply that the Company, with the approval of the corresponding corporate bodies, may agree with certain points of sale, advertising exclusivity for limited periods and in accordance with the applicable standards for free competition.
- Violating applicable regulations by preventing, restricting, or attempting to prevent or restrict the sale of competitors' products.
- Contravening applicable regulations by preventing, restricting, or attempting to prevent or restrict the display for sale of competitors' products.
- Paying or offering inducements, discounts or other benefits to prevent the sale or display of competitors' products.
- Threatening to refuse to sell, terminate credit granted to the point of sale or impair its terms, or terminate contracts or agreements, if the point of sale commercializes or displays competing products for sale.
- Offer or grant incentives or impose penalties based on the fulfillment of goals in purchases or sales of products that consider purchases or sales made by the point of sale in previous periods, unless their payment is pending and provided the delivery of the products purchased does not exceed 30 days, or that consider units to be acquired in future purchases or sales.
- Making tie-in sales, which are defined as the imposition on the point of sale of the requirement to jointly purchase 2 or more products of different brands manufactured or commercialized by the Company.

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Exceptions to the above are commercial promotions offered by the Company, which are always time-limited and adhered to voluntarily by the point of sale.

- Packaging of products, i.e. offering the point of sale or the end consumer the option of purchasing 2 or more different products together, with discounts or free products that make the purchase of the products separately unjustifiable from a rational point of view. Exceptions to the above are commercial promotions offered by the Company, which are always time-limited and adhered to voluntarily by the point of sale.
- Supervisors, sales or commercial area heads, and Company employees in general are prohibited from inciting or encouraging the Company's commercial area or sales force to engage in any prohibited conduct set forth herein
- Unjustifiably refusing to fulfill specific sales orders, placed by retail outlets, under the market conditions at issue.
- Making sales at prices below their cost, without reasons based on commercial uses and practices and with the purpose of displacing competition in the market or harming the image, assets or brand value of their suppliers.
- Agree to, discuss, or talk about competitive aspects (prices, discounts, margins, credit conditions, quantities to be sold or produced, geographic areas, customers, or projections of these variables, etc.) with individuals outside the Company, particularly with the Company's competitors and/or their personnel.
- Exchange with competitors of the Company and/or their personnel, data that would normally be regarded as trade secrets or commercially sensitive information. Prior to exchanging information with competitors and/or their personnel, appropriate corporate approvals, including that of the legal department, must be obtained to ensure compliance with applicable free competition standards.

The list of prohibited conducts is not exhaustive and has been prepared based on international standards and Coca-Cola Andina's main operations, in order to avoid engaging in any potentially questionable conduct, regardless of whether or not it is punishable in certain jurisdictions. Therefore, the inclusion of these does not necessarily imply a legality judgment with respect to the described conducts.