



CORPORATE POLICY FOR MANAGING CONFLICTS OF INTEREST AND RELATED PARTY TRANSACTIONS


Version	Description of changes	Approval	Effective Date
1.0	Initial Version	Miguel Ángel Peirano	January 2014
2.0	Introduces changes in section 6.c.viii and 7	Miguel Ángel Peirano	November 2014
3.0	Introduce changes in section 6.c.xi.	Miguel Ángel Peirano	March 2015
4.0	See detail in section 12. Track changes.	Miguel Ángel Peirano	November 2016
5.0	Administrative change due to implementation of electronic form	Miguel Ángel Peirano	October 2017
6.0	Overall, the Policy is updated.	Miguel Ángel Peirano	October 2020
7.0	Section 4.d: extends the term for declaration of personnel with a recent relationship to 60 days.	Miguel Ángel Peirano	September 2022
8.0	Changes in the scope and responsibility for managing the conflict of interest policy.	Miguel Ángel Peirano	May 2025

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1. Objective

The objectives of this Policy are to: i) establish guidelines for the adequate mitigation of Conflicts of Interest, implementing good corporate governance practices; and ii) generate a mechanism to adequately control possible operations of the Company with its related parties.

2. Scope

This Policy applies to all Company personnel and officers (hereinafter referred to as "Personnel"), regardless of their contractual status, who participate in decision-making processes and whose opinion and/or decision could affect the interests of Coca-Cola Andina and its subsidiaries, hereinafter referred to as the Company or the Operations, respectively.

The guidelines provided in this Policy are complementary to applicable legal provisions and the Company's Code of Ethics and Business Conduct.

3. Conflict of interests

a) Concept:

A Conflict of Interest occurs when, in an act, negotiation, or contract, the personnel involved in the decision-making process have or could have interests that could compromise their objectivity and put their own interests or that of third parties, ahead of the company's.

b) Basic principles:

i. Refrain from participating in decision-making.

Before participating in any decision-making process, whether for hiring new employees, granting credit to customers, negotiating with suppliers or bidding processes, or any other, Personnel involved must verify that they do not face a Conflict of Interest. If this is the case, they must refrain from participating in the discussion and decision-making, and report the matter as indicated below:

In the cases of:

- Directors and the Chief Executive Officer, to the Chairman of the Board of Directors
- Corporate Managers and General Managers, to the Chief Executive Officer;
- Corporate Office Personnel, to the corresponding Corporate Manager and to the Corporate Compliance and Ethics Manager;
- First Line Managers, to the General Manager of the respective Operation; and
- Other employees, to the corresponding Manager, and to the corresponding Administration and Finance Manager.

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- ii. Duty to report decisions or potential decisions against the interests of the Company.

It is the responsibility of Personnel to report to their superior, or alternatively, through a whistleblower channel, any employee or third-party act, negotiation, or contract that, in their opinion, goes against the company's best interests.

- iii. Best interests of the Company

Personnel may not prioritize their own interests over those of the Company. In addition, no individual, natural or legal, who has a relationship with Personnel and whose position as an employee, officer, or director of the Company enables him or her to benefit unduly from the Personnel.

c) Conflict of Interest examples:

The following examples are not an exhaustive list, therefore any other situation involving or potentially involving a Conflict of Interest must be reported as set forth in this Policy.

- ∴ Hiring family members: Hiring family members in certain positions may create a potential Conflict of Interest.
- ∴ Incompatibility due to work hours: No private activities may be conducted at times that coincide wholly or partially coincide with the assigned work hours, without the corresponding authorization.
- ∴ Transactions with relatives, friends and others: Conducting transactions or other acts on behalf of the Company with relatives or friends may create a Conflict of Interest. If you find yourself in this situation, you must refrain and report it.
- ∴ Other Conflict of Interest situations:
 - That an employee or immediate family member, serves as an officer or director or as a consultant for a company or person conducting or seeking to conduct business with the Company. This applies to relationships with both customers and suppliers of the Company.
 - That an employee or direct family member accepts commissions, profit sharing, gifts of money or other payments, loans, materials, services for free or at unreasonably low prices, excessive hospitality or entertainment or extravagance, travel, etc. from any organization, company or individual conducting or seeking to conduct business with the Company.
 - Improperly using one's position, i.e., outside of one's authority or competence, to influence another individual in order to obtain a direct or indirect benefit for oneself or for a third party.
 - Executing activities, taking time out of the workday or using Company personnel or resources for personal gain or for purposes unrelated to those of the Company.
 - Intervening, as a result of his/her position, in matters in which he/she has a private interest or in which his/her spouse, relatives or friends have an interest and, in general, participating in decisions related to the Company's interests when there is any circumstance that compromises their objectivity.

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4. Related Party Transactions and Related Party Statements

a) Concept:

Related party transactions are any negotiation, act, contract or transaction in which the Company must intervene, and also certain persons, such as its subsidiaries, its directors, managers, administrators, principal officers, or their respective spouses or close relatives, as well as companies in which they own 10% or more of their capital (directly or indirectly through other individuals or legal entities), or their directors, managers, administrators, principal officers, among others.

b) Basic principles:

The Company may only enter into transactions with related parties when their purpose is to contribute to the corporate interest, their price, terms and conditions are consistent with those prevailing in the market at the time of their approval, and they comply with the requirements and procedures established by law, including prior approval by the Board of Directors.

c) Related Party Statement:

In order to comply with legal requirements regarding transactions with related parties, the Company requires the following Personnel to submit periodic related party statements describing their professional and economic activities, as well as their related parties:


Directors	Chief Executive Officer and the assistant to the CEO
Corporate Officers, their direct reports, their assistants and all Corporate personnel.	General Managers
Managers (first line of the General Manager)	All IT, Procurement, Credit and Collections personnel and second line Sales Management.

Administration and Finance Managers of each of the Operations should review their organizational structure to determine if it is appropriate to incorporate other internal or external people in this process.

It should be noted that each Operation is responsible for managing the process for its country's IT personnel.

d) Deadlines and mechanism for statements:


During October and November of each year, related party statements must be submitted through the Company's existing Related Party Statement System or the one indicated at the time, as well as each time a relevant event occurs, i.e. each time a change in the circumstances described in the original statement is verified.

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Personnel subject to this Policy who have a recent relationship must submit their statement within 60 days of their incorporation.

5. Responsible individuals

- a) The Corporate Compliance and Ethics Manager shall perform the following actions:
 - i. Provide the means for Coca-Cola Andina personnel to make their related party disclosures. To this end, he or she shall coordinate with local Administration and Finance managers as necessary.
 - ii. Maintain custody of the disclosures made at the Board of Directors and corporate levels, and any updates thereto, for a period of two years.
 - iii. Report annually to the Chief Executive Officer on the adequacy of the activities carried out by the Administration and Finance Managers of the Company's various Operations to comply with this Policy. To this end, he shall request from the Administration and Finance Managers a report on the level of compliance with related party disclosures in their Operations, detailing who has failed to make their disclosure in a timely manner.
 - iv. At Board and Corporate level:
 - ✓ In October of each year, formally request the relevant statements. To this end, a communiqué must be drafted that specifies the objective and deadline for delivering such information.
 - ✓ Compliance with the related party statement process must be monitored and reported to the Chief Executive Officer.
- b) The Chief Legal Officer shall be responsible for managing this Policy. To accomplish this, he/she shall perform the following actions:
 - i. Identify the needs for updating this policy and/or issuing associated standards.
 - ii. Resolve questions raised by Operations or corporate personnel regarding this policy.
 - iii. Review and approve any proposed modifications to this Policy and/or its associated standards, if any.
 - iv. At the Board and Corporate level, deliver or send the Corporate Policy on Conflict of Interest and Related Party Transactions to Personnel.
- c) The Administration and Finance Managers of the Operations in Argentina, Brazil, Chile and Paraguay are responsible for ensuring adequate compliance with this Policy. To this end, they shall carry out the following actions:
 - i. Define the Personnel within the scope, taking as a basis those indicated in this Policy.
 - ii. Train the Personnel involved, ensuring that the objective of this Policy is fully understood.
 - iii. Deliver the Corporate Policy on Conflicts of Interest and Related Party Transactions to the relevant Personnel, obtaining acknowledgment of receipt and commitment to its compliance.
 - iv. Formally request, in October of each year, the relevant statements. To this end, they must prepare a communiqué, outlining the purpose and information delivery deadlines.

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- v. At least every six months, the Administration and Finance Manager of each Operation shall send an email to Personnel reminding them of their obligation to report any changes to the submitted related party statements and any circumstances that may lead to a Conflict of Interest.
- vi. Report annually to the Chief Financial Officer, during the first week of December, any non-compliance regarding related party statements due in November of each year, as indicated in this Policy.
- vii. Hire the external service of verifying the relational (family) and company ownership structure of the personnel in the countries where this service is available, in order to minimize the risk of omission of relevant information in the statements.
- viii. Retrieve the database containing the statements from the Related Party Statement system in order to identify transactions that may result in a Conflict of Interest. At least every two months, the database must be compared with the transactions recorded in the accounts, thereby obtaining a description of the operations with related parties, based on which it must be determined whether unreported conflicts of interest existed. This database must also contain directors' and corporate personnel's related party statements.
- ix. In the event of detected conflicts of interest that have not been disclosed, background information will be requested from those involved and the General Manager of the respective Operation and the Corporate Compliance and Ethics Manager will be notified, who will then inform the Board of Directors or any other committee designated by the Board.
- x. To store, for a period of two years, the corresponding related party statements and their updates.
- xi. Ensure that the Human Resources Policies include guidelines to be followed regarding the hiring of family members and/or incompatibilities due to the working day, such as engaging in private activities during hours that coincide in whole or in part with the assigned workday.
- xii. Timely analysis of related party transactions, considering the criticality of these matters. To this end, an adequate and documented analysis must be conducted; the analysis should address and verify the following:
 - Segregation of duties: a correct segregation of duties has been respected and applied in the decision-making process, and the Personnel in conflict refrained from participating in the entire process, thereby protecting the interest of the Company.
 - Authorization: the corresponding authorizations have been granted in a timely manner.
 - Nature of the operation: The operations performed are necessary and are conducted under advantageous conditions for the Company.

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6. Disciplinary actions

Disciplinary action arising from any potential violation of this Policy is at the sole discretion of the Board of Directors or any other committee designated by the Board.

7. Transition standard

This Policy is immediately applicable as of its effective date.

8. Track changes

Version	Description of main changes (for more information, contact politicascorporativas@koandina.com)	Approval	Effective Date
1.0	Initial version	M. Ángel Peirano	December 2013
2.0	Section 6.c.vii: Specifies that Directors and corporate personnel must be included in the database of interest statements. Section 7: The scope of this Policy includes the second line of Sales Management.	M. Ángel Peirano	November 2014
3.0	Section 6.c.xi: Administration and Finance Managers should conduct and document an analysis of related party transactions, addressing the following aspects: segregation of duties, authorization and nature of the transaction.	M. Ángel Peirano	March 2015
4.0	Section 4.d: Emphasis is placed on the duty to disclose at all times any Conflict of Interest that one has or may have . Section 6.b.iii: It specifies that the Corporate Legal Management holds custody of the statements at the Board of Directors and Corporate level. Section 6.c.vii: Establishes that the Corporate Administration and Finance Management will send to the Operations the information declared by the Directors and Corporate personnel, so that it can be incorporated into their respective databases. Section 7: In addition to the personnel who must submit their statement of interests, there are also the direct reports of the Corporate Managers and their assistants (secretaries). Section 8: Personnel at any level who are required to make decisions involving public entities or participate in any process involving them are included. Section 8.b: Corporate Office personnel are included. Section 9: It establishes that the declaration of interests must be filed annually between October and November. Section 11.a: Affinity degrees are included	M. Ángel Peirano	November 2016
5.0	Administrative aspects have been modified due to the implementation of the electronic form.	M. Ángel Peirano	November 2017
6.0	Overall, the Policy is updated. The main changes are as follows:	M. Ángel Peirano	October 2020

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Version	Description of main changes (for more information, contact politicascorporativas@koandina.com)	Approval	Effective Date
	<ul style="list-style-type: none"> - Restructure the entire policy to make a clearer distinction between "conflicts of interest" and "related party transactions." - Elimination of the declaration of conflict of interest form. - Reorganization and further detailing of the responsibilities of the corporate Legal and Finance and Administration Managements. - Incorporation of the instruction to hire the service of verifying the relational (family) and company ownership structure of the personnel in the countries where this service is available. - Expansion of the scope of the reporting process (adding all corporate and IT personnel of the four operations). 		
7.0	Section 4.d: extends the term for declaration of personnel with a recent relationship to 60 days.	M. Ángel Peirano	September 2022
8.0	<p>General Changes:</p> <ul style="list-style-type: none"> • Scope: Applies to Company employees and executives; it previously included directors. • Conflict of interest: The following is added to the definition: "relating to one's own or a third party's interests." • Basic Principles (Abstention from Participation in Decision-Making): <ul style="list-style-type: none"> ○ Directors are no longer required to report; instead, the Chief Executive Officer must notify the Chairman of the Board of Directors when a conflict of interest arises. ○ Corporate office personnel must notify the relevant Corporate Manager and also the Corporate Compliance and Ethics Manager, eliminating the need to notify the Chief Financial Officer. • Responsible parties: The Corporate Compliance and Ethics Manager will now be responsible, instead of the Chief Financial Officer. 	M. Ángel Peirano	May 2025