



**MASISA**  
Tu mundo, tu estilo

## Relationships with Public Officials and Politically Exposed Persons

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## 1. INTRODUCTION

### 1.1. Purpose

The purpose of this document is to establish certain rules that will govern Masisa's relationships with public officials and politically exposed persons.

### 1.2. Scope

It applies to all the employees of Masisa and its affiliates, who have to deal with national or foreign Public Officials or Politically Exposed Persons.

### 1.3. Definitions and abbreviations

- **Public Entity:** Any legal entity part of the National Government, Regional Government and Local Government, including the respective decentralized organization and companies that are part of them.
- **National Public Official:** Any person that holds a public position, whether in the Central Administration or in semi-fiscal, municipal and autonomous institutions or companies or agencies created by the State or dependent on it, even if they are not appointed by the President of the Republic and do not receive a salary from the State. This definition will also include those positions elected by popular vote (Chilean Penal Code, article 260).
- **Foreign Public Official:** Any person who holds a legislative, administrative or judicial position in a foreign country, whether appointed or elected, as well as any person that carries out a public function for a foreign country within a public organization or company. This definition also includes officials that work for public international organization (Chilean Penal Code, article 251 Ter).
- **Relationship Manager:** means that employee of the company or a third party (such as an advisor, consultant, supplier and contractor) that serves as spokesperson of Masisa or its affiliates in relation to public entities and/or regulators. The Relationship Manager must comply with and ensure compliance with Masisa's Relationship Policy and provide prompt reports to the administration.
- **Bribery:** Offering or agreeing to give a Public Official (domestic or foreign) an economic or other benefit, for the benefit of the latter or a third party, so that he or she carries out an action or fails to carry out one, in his capacity as a Public Official.
- **Lobby:** These are the paid steps or activities carried out by Chilean or foreign individuals or legal entities, whose purpose is to promote, defend or represent any particular interest and influence the decisions of public agencies (Law 20,730, article 2, number 1).
- **Lobbyist:** The Chilean or foreign individuals or legal entities who does lobby. If he receives no remuneration for his services, he will be called a private interests manager, be they individual or collective (Law 20,730, article 2, number 5).
- **Private interest:** Any purpose or benefit, whether or not of an economic nature, of a Chilean or foreign individual or legal entity, or of a specific association or entity (Law 20,730, article 2, number 4).
- **Social Activities and CSR:** These are the events in which the company involves public officials, in order to promote and encourage relations or communication with the community within the framework of the Company's corporate social responsibility.
- **Public Registry:** public registries in which taxpayers must include the information indicated in article 8 of Law 20,730.

## 2. POLICY DESCRIPTION

### 2.1. Relationship Managers

- Each department will define who will be their “Relationship Managers”. These appointments will be reported to the Crime Prevention Officer for their training on the Company’s Crime Prevention Policy and Model.
- The Relationship Managers will disclose any type of impediment to carry out such commission, either due to a conflict of interest or by personal affinity (kinship, friendship, mutual business, politics, etc.) that could be construed as a conflict of interest.
- Without prejudice to the foregoing, the Relationship Manager may not:
  - Offer, give or accept to give improper benefits (monetary or not) of any nature (directly or indirectly through an intermediary) to influence or obtain any improper or illegal action related to Masisa.
  - Exercise undue influence when there is an affinity relationship to influence any improper or illegal action.
  - Contribute to a public official subtracting or diverting funds that are managed by him.
  - Maintain informal meetings with other persons, in his capacity as spokesperson of Masisa and its affiliates.
  - Attend events or accept invitations where his participation may be misunderstood or may influence decisions, or may affect the independence and impartiality of the Manager.

### 2.2. Meetings with public entities

- Meetings with public entities or officials will be coordinated by the Relationship Managers in conjunction with the Legal Manager or whoever is designated for that purpose.
- All communication with public entities, whether to arrange meetings or send information, must be made by institutional email with a copy to the first level Manager responsible or competent for the subject matter (avoid text messages).
- All meetings with public entities must be held formally, preferably at the offices of Masisa or the public entity during business hours, avoiding public places such as cafes, restaurants, etc.
- Meetings may not be held with only one representative from Masisa. There will always have to be two or more Managers.
- Once the meeting is over, the Manager must inform the Crime Prevention Officer of what happened at the meeting, as indicated in number 2.7 of this policy.
- If contact with public entities or officials is related to CSR actions or activities, they must be informed in the same way within the term and in the manner indicated in this policy by the Manager responsible for the activity.

### 2.3. Audits

- Each Department will provide a place to address the concerns of the auditors and appoint a person to which they can make their queries.
- This protocol must be made known to the security company and/or assistants who will be the first contact in case of face-to-face inspections.
- The Manager and one or more persons from the company must be present throughout the inspection process.
- All information that is delivered will have to be exclusively related to the audit process and must be delivered by institutional email with a copy to the first level manager responsible or competent

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for the subject matter (avoid text messages). Additional information to be displayed or delivered must be previously authorized by the respective Department Manager.

- Once the inspection has finished, the Manager must inform the Crime Prevention Officer as indicated in section 2.7 of this policy.

## **2.4. Support or gifts to national or foreign public officials or entities**

- Any type of support (monetary or not) to entities or politicians or persons related to them (such as foundations, study centers, etc.), given or received, must be reported to the Crime Prevention Officer, as indicated in section 2.7 of this policy.
- Any donation made to public agencies or officials will be governed by Masisa's donation policy.
- Official protocol gifts (with institutional logos), or those of little value (according to Masisa Business Principles and Framework of Action), which are "customary" (courtesy and good manners) and which cannot be interpreted as a commitment or influence, may be given and accepted.

## **2.5. Support or gifts to political entities or politicians.**

- Any donation made to political parties will be governed by the current regulations, by the electoral service and/or Masisa's donation policy.
- Any type of support (monetary or not) to political entities or politicians or linked to them (such as foundations, study centers, etc.), given or received, must be reported to the Crime Prevention Officer as described in section 2.7 of this policy.
- Official protocol gifts (with institutional logos), or those of little value (according to Masisa Business Principles and Framework of Action), which are "customary" (courtesy and good manners) and which cannot be interpreted as a commitment or influence, may be given and accepted.

## **2.6. Relationship expenses**

- In the case of incurring expenses as a result of these activities, these must not exceed 3 UF per person, including food (coffee, lunch or dinner). This expense, to be reimbursed by the Company, must be duly supported by a receipt or invoice, to which a tip that is customary in the country will be added (for example, 10% in the case of Chile).
- The items of transportation, fuel and stay of the Relationship Managers are excluded from this report, and will be governed by Masisa's Expense Report Policies.
- The relationship expense will be reimbursed upon the submission of the respective expense report, which must indicate: the amounts involved therein, participants and the respective activity carried out. Such expenses cannot be reported as expenses related to investment projects or similar ones. The expense approver must ensure compliance with this policy.
- Expenses due to services, permits, licenses, or any other payment will be governed by Masisa's Procurement Policy and may not be made in cash.

## **2.7. Registry of Activities**

- Any relationship activity carried out must be reported and registered within 10 business days using the web form (\*) provided to that end, or the form attached hereto, which must be sent to the Crime Prevention Officer.
- Bimonthly, the Crime Prevention Officer will send a report to the Legal Manager and General Manager on the activities that have been reported.

- Quarterly, expense reports will be sent to the Risk and Audit Committee in relation to these activities.
- Any suspicion, concern, doubt, question or payment request should be immediately communicated to the Crime Prevention Officer or through the respective reporting channel.
- In the case of meetings subject to the Lobbying Law, they must be recorded in the respective Public Registries.

## 2.8. Exceptions

Any exception to this policy must be previously authorized by Masisa's General Manager, Legal Manager and the Crime Prevention Officer.

## 3. RESPONSIBLE FOR ITS APPLICATION AND FOLLOW UP

Position	Application	Follow up
All Business Units and Support, Corporate and Local Departments	X	
Crime Prevention Officer	X	X
Legal Manager	X	X
General Manager	X	X

## 4. VALIDATION PROCESS

Function	Name	Position	Date
Prepared by	Eduardo Muñoz	Internal Audit Manager Crime Prevention Officer	April 2022
Reviewed by	Patricio Reyes Alejandro Carrillo	Legal Manager General Manager	April 2022
Approved by		Risk and Audit Committee	April 2022
Effective Date: May 2022		Version: 01	

## 5. CHANGE CONTROL

Reason	Responsible	Date

## 6. POLICIES AND ASSOCIATED PROCEDURES

- Crime Prevention Model.
- Corporate Communications Policy.
- Donations Policy.
- WIKI Policies and Procedures.
- Masisa Framework of Action.

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## Annex: Relationship Activities Form

MASISA INFORMATION		
	Indicate the name of the Relationship Manager and any other participant on behalf of the company	Indicate the position held at Masisa. If it is a third party, indicate name of the company and position held therein
	Name	Position
Masisa Relationship Manager		
Masisa Representatives		
Name of the group		Does not apply
PUBLIC ENTITIES OR POLITICALLY EXPOSED PERSON (PEP)		
	Indicate the name of the entity, individual or any other participant	Indicate the position held therein
	Name	Position
Public Entity or Political Party		Does not apply
Representative(s) Agency or PEP		
RELATIONSHIP INFORMATION		
	Date	
	Meeting duration	
	Reason for the meeting	
	Place	
Expenses incurred by Masisa	\$	
Did you request or were you requested benefits or favors to engage in illicit activities according to national laws and/or company policies?	Yes	<input type="text"/>
	No	<input type="text"/>
Comments / Additional information		
Note: The Crime Prevention Officer and the Legal Manager may require additional information, if they deem it appropriate.		
_____	_____	
Name, position	Signature	