



**Compliance Policy Against Bribery and Corruption
Xmartlab Limited (“Xmartlab”)**



Introduction

At Xmartlab we believe in fair competition, assuming the commitment not to participate in acts of bribery or corruption anywhere in the world. We expect the same behavior from our directors, executives and employees, as well as from our distributors, agents and partners. Any act contrary to this policy will be dealt with immediately and severely to the fullest extent permitted by law.

Gonzalo Paredes
General Manager

Dand compliance with the commitment to creating and maintaining a strong culture against corruption and to assert and enforce all laws, Xmartlab does not tolerate any form of bribery or corruption. It has been and continues to be part of Xmartlab's policy to carry out its operations and activities in accordance with the letter and spirit of all local and international anti-corruption laws and regulations, such as, among others, Chilean bribery laws. and corruption and the Law on criminal liability of legal entities in Chile (Law 20393) and similar laws applicable in the countries in which the Company operates (collectively, "Applicable anti-corruption laws").

Anti-Corruption

Policy This Anti-Bribery and Corruption Compliance Policy (the "Policy") applies to all local and foreign Xmartlab operations, as well as to all directors, officers and employees globally (collectively, the "Staff "), Including all Xmartlab subsidiaries and affiliates and companies in which Xmartlab has a 50% or greater shareholding or in which Xmartlab has control of management (even if Xmartlab is a partial owner or partner of a joint venture) . Xmartlab also requires that all distributors, agents, contractors, subcontractors, consultants, representatives, intermediaries, business partners, joint venture partners, and other third parties associated with Xmartlab, or any of its subsidiaries or conducting business on behalf of Xmartlab (in collectively, "Business Partners") comply with this Policy. Staff and Business Partners may be required to complete certifications of compliance with applicable Anti-Corruption Laws and this Policy.

This Policy prohibits **improper Payments** made in relation to Xmartlab or on behalf of Xmartlab. For the purposes of this Policy, the term **Improper Payments** includes a wide range of corrupt payments of cash or any item of value or any (not necessarily financial) advantage made or granted for the purpose of favorably influencing any business related decision. from Xmartlab, to obtain an improper advantage, to induce or reward improper performance for the personal benefit of an individual, or when the payment or advantage itself is improper. The term Improper Payments not limited to cash, but also includes the following corrupt payments:

- Cash equivalents (such as gift cards or prepaid credit cards);



- Gifts;
- Entertainment districts, meals and travel;
- Contributions and / or in kind services;
- Business, employment or investment opportunities;
- Use of Xmartlab products, services, facilities, equipment or properties without compensation or at a discount;
- Donaciones or inputs, including delivery of tangible goods without compensation or discount (including residues or rescue items);
- PAug medical expenses;
- Asistencia or support for family and friends;
- Charitable contributions, including bona fide organizations; and
- Others benefits and advantages.

Policy Xmartlab's regarding bribery and corruption is absolutely clear: no one may offer, give or receive bribes or improper Payments in relation to their work for Xmartlab from anyone or anyone at any time and for any reason, and no one should request to anyone else who participates in a bribe or makes an Improper Payment on behalf of Xmartlab. No executive, director, employee or Business Partner may:

- **Offer, promise, pay or authorize an offer or payment of money or any item of value to a Public Official or any other person or entity, directly or indirectly, that is:**
 - In order to corruptly influence any measure (or omission) or decision that the recipient may take in his capacity as a public official, or in violation of the recipient's lawful duties;
 - For the purpose of corruptly inducing the recipient to use his influence or to affect a measure or decision of the entity involved;



- For the purpose of corruptly obtaining an improper advantage or assisting Xmartlab in obtaining or retaining a business; or
 - In order to show gratitude to the recipient for having made a decision or acting in such a way that Xmartlab was improperly benefited.
- Request or accept money or other item of value, directly or indirectly:
 - For the purpose of improperly influencing the recipient's judgment or conduct, whether to take a measure, omit a measure, or use your influence in the discharge of your job responsibilities;
 - For the purpose of showing gratitude for having made a decision or acting in a manner that improperly benefited the person who awarded the item of value to the recipient.

These prohibitions are described in more detail in the following sections.

1. Prohibition of bribing public officials

Xmartlab and all Personnel and Business Partners employed by Xmartlab or affiliated with Xmartlab are prohibited from granting, promising, offering or authorizing, directly or indirectly, an **Improper Payment** to a **Public Official**, or a **Close Relative** of a **Public Official**, or to any other person at the request of a **Public Official** or with the permission or consent of a **Public Official**.

Xmartlab also prohibits any **Improper Payment**, promise, offer or authorization to make an **Improper Payment** to any person knowing that it is to be made or shared with a **Public Official**, **Close Relative** of a **Public Official**, or other person appointed to that position.

For purposes of this Policy, a **public official**

- A means..ny officer or employee of any national, regional, local government or other government or any department, agency or representative of such government, including elected or appointed officials (eg one member of the Ministry of mining) in any power (executive, legislative or judicial);



- Any officer or employee of a company or undertaking owned, is controlled or fulfill any function of government (eg national energy and transportation companies, health service providers and state companies snuff..);
- Any officer or employee of a university or public research organization or be sponsored by the state;
- Any politician, political party official political party or candidate at any level;
- Any officer or employee of a public international organization (p. Eg. The Bank World, the United Nations or the International Monetary Fund);
- Any member of a royal family or the military;
- Cany person acting in an official capacity, for or on behalf of any of the above categories (whether remunerated or not); and
- Any person who has a Public Official status in accordance with applicable local laws or Xmartlab policies.

For the purposes of this Policy, the term **Family near** includes spouses, partners, parents, grandparents, siblings, children, grandchildren, nephews, uncles or cousins, whether blood or affinity, including spouse and / or partner **Officer Public** and any other person who shares the same household with the **Public Official**.

Xmartlab allows certain business courtesies, such as meals, to be provided to **Public Officials** within a concise list of exceptions set forth in the Gifts, Entertainment and Hospitality Xmartlab Procedure, and only in accordance with what is permitted by applicable law, including written law from the country of the **Public Official**.

2. Prohibition of Commercial Bribery



Xmartlab and all Personnel and Business Partners employed or affiliated with Xmartlab are prohibited from making, promising, offering or authorizing, directly or indirectly, **improper Payments**, including bribes, illegal commissions or payments to suppliers, customers or others. third parties for the purpose of improperly influencing the actions of the other party to obtain an undue advantage of the commercial conduct of its employee or principal. This includes awarding offers or benefits to someone who does not know who that person's employer or principal is.

3. Prohibition of Receiving Improper Payments

None of the Staff or Business Partners Xmartlab employed by Xmartlab or affiliated with Xmartlab may request, agree, receive or accept, directly or indirectly, any advantage financial or other any item of value. to induce or reward improper performance of services or benefits by any of the Staff or Business Partners Xmartlab employed by Xmartlab or affiliated with Xmartlab

4. Prohibition from making political contributions

Xmartlab makes no contributions of any kind to any kind of political party, political party officials or political candidates.

5. Prohibition of “Facilitation Payments”

Payments made to Public Officials to stimulate or accelerate the fulfillment of an existing duty or obligation (generally called “Facilitation Payments”) are prohibited by Xmartlab.

6. Health and Safety Payments

On rare occasions, a Xmartlab executive, director or employee may consider it necessary to make a payment to a Public Official to avoid imminent harm, such as a threat to health, safety or personal liberty, and cannot obtain prior approval to do so. This type of payment is not considered a Facilitation Payment, but a payment made in response to a coercion when, at the discretion of that executive, director or employee at the time, the payment is necessary to withdraw or mitigate the threat or risk of physical harm imminent for him, a family member or colleague or to prevent the arrest of any of these people. When this type of payment is made, the executive, director or employee who made the payment should contact the Risk Management and Compliance Management as soon as possible for additional instructions.

Xmartlab Staff should avoid the need to make health and safety payments. It is the responsibility of each Xmartlab executive, director or employee to ensure that they



have complied with all applicable laws and maintain the necessary documentation to comply with all health, safety and migration requirements to reduce the risk of arrest or of being subjected to possible Physical damage.

7. Records

Many of the applicable Anti-Corruption Laws also contain provisions that require Xmartlab (a) to make and maintain records that fairly and in reasonable detail reflect the operations and disposition of assets, and (b) maintain internal controls to provide reasonable assurance that operations are performed and recorded appropriately. Accordingly, all Personnel and Business Partners employed by Xmartlab or affiliated with Xmartlab must accurately document and record all expenses incurred on behalf of Xmartlab and are prohibited from concealing or misrepresenting Company expenses or making payments on behalf of Xmartlab without the necessary approvals and supporting documentation that verifies the validity of the operation.

8. Violations

All Personnel and Business Partners employed by Xmartlab or affiliated with Xmartlab are expected to understand and comply with this Policy and the applicable Anti-Corruption Laws. Failure to comply with these may result in disciplinary measures, which could include dismissal and / or the termination of the business relationship with Xmartlab. Failure to comply with this Policy and these laws could result in possible significant financial sanctions for the company, as well as imprisonment and monetary fines for the people involved in the corresponding conduct. A violation of the applicable anti-corruption laws could also result in restrictions to operate, such as suspensions or prohibition to bid, could cause significant damage to the reputation of the company and its personnel, and even result in the dissolution of Xmartlab.

9. Reporting Obligations and Additional Information

All Xmartlab Personnel and Business Partners employed by Xmartlab or affiliated with Xmartlab have the responsibility to immediately report any suspicion or knowledge of a violation of this Policy, other Xmartlab policies and any applicable laws. The requirement to report suspicion or knowledge that an offense has been committed should not be construed as a provision that prevents employees from also reporting violations to appropriate government authorities. You may decide to report to your supervisor, to any member of the Ethics and Compliance Oversight Council, the Ethics and Compliance Committee or to the Compliance area, or through the information channels listed below. Xmartlab will ensure that reporting channels are



available and will ensure that accurate contact information for these reporting mechanisms is available. Complaints can be anonymous, if local law allows it.

- Postal mail: Confidential letter, addressed to:

Compliance Officer of Xmartlab - Huelen # 10, of. 202, Providencia, Santiago, Chile.

- Email addresses: denuncias@xmartlab.com

Xmartlab will not retaliate or tolerate retaliation against employees who report in good faith a possible violation of this Policy, even if an investigation determines that no violation has occurred.

Inquiries related to this Policy or the applicable anti-corruption laws should be sent to the Risk Management and Compliance Management.