



LOBBY AND MEMBERSHIPS POLICY

Lithium Division

August, 2024



1. Purpose

The primary objective of this Policy is to ensure that all lobbying activities and memberships undertaken by SQM Salar SpA are aligned with our corporate values, legal obligations, and contribute positively to our reputation and business objectives. The Company understands that aligning lobbying efforts and trade association memberships with the goals of the Paris Agreement is essential to protect the SQM's reputation as a responsible company and to promote consistent and strong action on climate change.

By following this policy SQM Salar SpA aims to reinforce its commitment to responsible corporate citizenship, ethical conduct, and sustainable growth, while enhancing the positive impact of its engagements in the industry and society.

2. Scope

This Lobby and Memberships Policy applies to all activities related to lobby and memberships, affiliations, and partnerships undertaken by SQM Salar SpA. This Policy outlines the principles and guidelines that govern the company's engagement in lobby and membership to ensure ethical and transparent practices.

3. Definitions

In this Policy, capitalized terms shall have the meaning set forth in Annex N° 1.

4. Guiding Principles

Every membership and sponsorship shall abide by the following principles:

- a) **Transparency and Accountability:** All lobbying activities and memberships shall be conducted transparently and documented appropriately. Decisions related to lobby and memberships must be well-documented, demonstrating compliance with this Policy and relevant laws.
- b) **Legitimate Purpose:** Lobbying activities and memberships must align with the company's values, business objectives, long-term sustainability goals, local laws and regulations. Priority shall be given to opportunities that promote responsible business practices, community engagement, and industry leadership. The company shall not engage in lobbying activities or memberships that may pose legal risks or reputational harm.



- c) **Avoidance of Conflicts of Interest and Due Diligence:** Lobbying activities and memberships shall be pursued without conflicts of interest. Employees involved in the selection and management of lobbying activities and memberships shall disclose any potential conflicts and refrain from engaging in activities that compromise the company's integrity.
- d) **Proportionality:** Equity between the amount paid for the lobbying activity and the benefits received in return. As for memberships, SQM Salar SpA delegates must make sure the benefits obtained from participating on the trade association.

5. Guidelines

- a) **Selection Criteria:** Lobbying activities and memberships, shall be evaluated based on their alignment with the company's strategic goals, values, and relevance to the industry and local communities as per stated every year on SQM's Shared Social Value Program. The evaluation process should include a comprehensive analysis of how these activities or memberships support the advancement of the industry, foster innovation, and promote sustainable practices in alignment with our ESG commitments.

The potential lobbying or membership partners must demonstrate a strong adherence to ethical standards and values consistent with SQM's core principles, including transparency, social responsibility, and respect for human rights. This includes ensuring that the partner's objectives do not conflict with the principles outlined in SQM's Code of Ethics and Shared Social Value Program.

- b) **Due Diligence:** Prior to entering any lobbying activity or membership, the sponsors of this initiatives must follow the Procedure For Commercial Relations With Third Parties and the Sponsorships and Memberships Procedure, as applicable, to complete the Due Diligence and receive the necessary approvals for each procedure. The due diligence process shall be conducted to assess the reputation, track record, and values of the potential partner or organization. Before committing to any lobbying activity or membership, a thorough due diligence process must be undertaken to evaluate the potential partner's reputation, operational history, and alignment with the Paris Agreement and SQM's values. This process should involve an in-depth review of the partner's past lobbying efforts, public statements, and affiliations to identify any potential risks or conflicts of interest.

The due diligence process should also include an assessment of any legal, financial, or reputational risks associated with the partnership. This may involve consulting with the Compliance team to ensure that the lobbying activities or memberships are in full compliance with local, national, and international regulations. Where appropriate, input from relevant internal stakeholders, such as senior management, legal, compliance, and sustainability teams, should be sought to ensure a holistic evaluation of the potential partnership. Once the Due Diligence process is completed, the approvals of the high direction of the company will be requested in accordance with the procedures indicated.

- c) **Duration and Review:** The duration and effectiveness of lobbying activities and memberships shall be periodically reviewed to ensure they remain aligned with the company's objectives and provide value. Based on the outcomes of the periodic reviews,



decisions will be made regarding the renewal, modification, or termination of the lobbying activities or memberships. Any decision to renew or extend a partnership should be justified with clear evidence of its continued alignment with SQM's goals and its contribution to the company's strategic priorities. In the event that a trade association or lobby linked with SQM Salar SpA makes a statement that does not comply with the principles included in this policy, SQM Salar SpA will make a public statement distancing the company from the misalignment, and may request as a company the correction of this statement to the association or the abandonment of the trade association, and may form proactive coalitions to counteract lobbying not aligned with the Paris Agreement.

- d) Recordkeeping:** All documentation related to lobbying activities and memberships including agreements, due diligence records, and communications, shall be maintained in a secure and accessible location for audit and transparency purposes. These records must be stored in a secure and centralized digital repository, accessible only to authorized personnel, to safeguard the confidentiality and integrity of the information. The storage system should be compliant with relevant data protection laws and corporate policies on information security.
- To promote transparency and accountability, SQM Salar SpA shall ensure that records of lobbying activities and memberships are available for internal audits and, where appropriate, for disclosure to relevant external parties such as regulatory authorities or shareholders. The company will adhere to all legal and regulatory requirements concerning the disclosure of lobbying activities, ensuring that all required reports and filings are completed in a timely and accurate manner. Lobbying and trade association activities related to climate change in which SQM Salar SpA participates must be reported annually in the company's sustainability report.

6. Whistleblower Channel

If employees become aware of any non-compliance with this Policy, they must report it through SQM's Whistleblower Channel. The communication channels of the Whistleblower Channel are:

- a. Through the URL www.denuncias.sqm.com;
- b. Through the telephone numbers indicated in the Code of Ethics and Internal Regulations for Health, Safety and Hygiene;
- c. Through the Whistleblower Channel link available on SQM's website; and,
- d. Through the Whistleblower Channel link available on the SQM intranet.

7. References

- Code Of Ethics.
- Procedure for Business Relations with Third Parties.
- Anti-Bribery and Corruption Policy.
- Procedure for Interactions with Public Officials.
- Sponsorships and Membership Procedure.



8. Approvals

Clasification Internal Use	Date of Approval 16-08-2023	Policy N°
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Version Control					
Date	Version	Modifications	Responsible	Reviewer	Approver
16/08/2023	01	General Text	Ethics and Compliance Department	Alberto Llona Compliance Officer	Carlos Diaz CEO Lithium Division
Signatures					



Annex N°1

Definitions

1. **Lobby:** any paid effort or activity carried out by individuals or legal entities, whether Chilean or foreign, that aims to promote, defend, or represent any particular interest, in order to influence the decisions that certain authorities and officials must make in the exercise of their duties. This includes specific efforts to influence the public decision-making process and changes in policies, plans, or programs under discussion or development, or regarding any measures implemented or matters that need to be resolved by the relevant official, authority, or public agency, or to prevent such decisions, changes, and measures.
2. **Membership:** formal association or affiliation that the company establishes with external organizations, associations, industry groups, chambers of commerce, professional bodies, or similar entities. These affiliations typically involve a defined relationship where the company becomes a member and contributes financially or through participation in the activities of the organization. Memberships can provide networking opportunities, access to industry insights, and a platform for the company to contribute to the advancement of its industry or related fields.