

BANCOESTADO COMPLAINT CHANNEL

GENERAL

BancoEstado prides itself on the values that are at the base of its culture and that define its way of relating and acting, always in search of honesty and correctness in all its practices. Therefore, in order to maintain and protect the highest standards of ethics and legality in products, services and in general in all its scope of action, it makes available to its customers, workers, suppliers and the general public this channel of Complaints - developed by Fundación Generación Empresarial - so that those who know or suspect of any conduct that could involve an act of money laundering, terrorist financing, bribery of a public, national or foreign official, concealment, conducts that threaten free competition, incompatible negotiation, corruption between individuals, misappropriation or unfair administration, may report it safely, so it be analyzed based on the background provided.

Additionally, Law N°21,132 was published on January 31, 2019, modernizing and strengthening the work of the Servicio Nacional de Pesca agency (National Fisheries Service), by adding four new crimes that generate criminal liability to legal persons (pollution of waters, fishing products during closed season, Illegal fishing of seabed resources, processing and storage of scarce products without certificated legal origin); the latter crimes mainly apply to this sector's activity and would not affect the BancoEstado corporation.

BOX

This complaints channel does not receive workplace or sexual harassment complaints at work.

This reporting channel is not an emergency service.

Do not use this site to report events that pose an immediate threat to life or property. Complaints submitted through this service do not receive an immediate response, as they require responsible analysis.

TERMS AND CONDITIONS

The use of this page, as well as entering complaints implies approval of the terms and conditions stated below. It is recommended to read them carefully, as they contain your rights and obligations regarding any operation related to this website.

This platform has been developed by Fundación Generación Empresarial at the request of BancoEstado with the purpose of encouraging, facilitating and communicating complaints that could involve an act of money laundering, terrorist financing or bribery of a public official, national or foreign, concealment, actions and conducts that attempt against free competition, incompatible negotiation, corruption between individuals, misappropriation or unfair administration, to which our clients, workers, providers and other relevant stakeholders for BancoEstado may be exposed.

You must keep in mind that:

- BancoEstado will carefully analyze all complaints made through this site. Please make your report as accurate and truthful as possible, providing quality records, so do not intentionally include false or misleading information. The intentional delivery of false or misleading information may lead to civil or criminal liability processes in accordance with the law.
- This Complaint Channel has been designed to guarantee the confidentiality of the information provided and is managed and technologically supported by Fundación Generación Empresarial with BancoEstado performing the analysis, investigation and resolution of the complaints filed.
- This service will require you to establish a password at the end of the procedure and an automatic report code will be generated so that you can enter to check out the status of your complaint whenever convenient. Your complaint will always be confidential.
- BancoEstado guarantees the confidentiality of the claimant, who can be an official, client, supplier or general public.

The user agrees to:

- **Provide complete and reliable information regarding both the complaint and yourself, whenever applicable;**
- **Set forth and describe real situations;**
- **Maintain a proper and respectful language;**
- **Strive to write the information correctly, avoiding lack of care;**
- **No phishing practices;**
- **Do not publish content not having rights of use, copyright, industrial property, or other equivalent;**
- **Do not publish content that directly or indirectly promotes arbitrary discrimination or hatred on people, groups and communities;**

- Refrain from publishing content that incorporates advertising, promotions or offers of paid services, or establishes spam systems (unsolicited mail), mail chains, etc.

Likewise, the user undertakes not to send, publish or transmit content of any kind that:

- Contains false information;
- Attempts against legal treaties or regulations related to copyright and industrial property in any territory;
- Encourages the performance of dangerous activities that threaten the physical or psychological health of people;
- Contains images or formats that are illegal, violent, degrading or pornographic;
- Incorporates viruses or any computer program that causes damage to the technology platform;
- Establishes spam systems (unsolicited mail);
- Goes against the Law, Morality and Good living Practices.

INITIAL QUESTIONS

Provide the information as follows:

1. Do you want to remain anonymous for this complaint?

Yes No

Your first name

Your last name

Your phone number

Best time to be contacted

Your email

2. What is your relationship with BancoEstado?
 1. BancoEstado's worker
 2. BancoEstado's subsidiary worker
 3. Third party worker
 4. BancoEstado's supplier
 5. BancoEstado's client
 6. Other; explain _____

3. Identify the type of complaint
 1. Bribery and corruption
 2. Asset laundering
 3. Terrorism Financing
 4. Concealment
 5. Disclosure of confidential or strategic information
 6. Anticompetitive conduct; any fact, act or convention that prevents, restricts or hinders free competition
 7. Incompatible negotiation
 8. Corruption among Individuals
 9. Misappropriation
 10. Unfair administration
 11. Other type of environmental fraud or crime.

DETAIL OF THE TYPE OF COMPLAINT

1) Bribery and corruption

Description:

It consists of offering or consenting to give a national or foreign public official, an economic benefit on his/her favor or to a third party to execute or omit the following actions:

- Execute an action proper of his/her role whereby there is no request of said rights.
- Omit a due act proper of his/her position
- Perform an act in violation of the duties of his office
- Exert influence on another public employee in order to obtain from him/her a decision that may generate a benefit for an interested third party.

Examples:

- *Request or receive from customer's money, gifts or loans in money and/or credit documents.*
- *BancoEstado workers must take special care to refrain from incurring any conduct that could mean or be interpreted as offering or consenting to give a public employee, national or foreign, any economic benefit, in order to obtain advantages and privileges other than those established in their functions or to specify personal business.*
- *Failure to what the established regulation states on commercial activities related to sponsorships, gifts and others to customers.*
- *Require from municipal employees or regulatory officers of regulatory entities special treatment or benefits to avoid possible observations, fines or other due actions of their role.*
- *Offer, give or consent to give some economic or other benefit to municipal inspectors, heads of municipal or other works departments, aimed at obtaining municipal permits, patents, authorization for works, etc.*

2) Asset laundering

Description:

It consists of hiding or concealing the illicit origin of goods from drug trafficking and psychotropic substances, terrorist behaviors, arms control, scams on the stock market, crimes and simple offenses committed by public employees while performing at their positions, fraud and illegal exactions and those related to kidnapping, abduction, pornography and prostitution of minors.

Examples:

- *Carry out transactions of high amounts (with or without cash) without having a paid job and/or economic activity that justifies such operations.*
- *Refuse to provide information on the origin of the funds of the operations carried out or be reluctant to do so, or not have a background to support the money.*
- *Use third parties to perform various banking operations and thus hide the identity of the real manager of these.*
- *Appear in a short period of time as owner of assets of high asset value, without having economic activities that allow for it.*
- *Increase in an unusual and unjustified manner the turnover of the business, observed from the economic activity being exercised and the profile of an individual.*

3) Terrorism Financing

Description:

It is executed by anyone who, directly or indirectly, requests, collects or provides funds in order to be used in the commission of any of the terrorist crimes.

Examples:

- *Purchase of products/services from companies related to terrorist financing.*
- *Donations to entities that have links with terrorist organizations.*
- *Commit funds that directly or indirectly will be used, in whole or in part, for the commission of activities of a terrorist nature.*

4) Concealment

Description:

The one who knowing its origin or not being able to know it, holds in his/her possession, under any title, stolen species or receives stolen goods or misappropriates species, transports, buys, sells, transforms or markets them in any form, even if already had disposed of them, will suffer the penalty of minor imprisonment in any of its degrees and fine of five to one hundred monthly tax units (Art. 456 bis of the Penal Code).

For the determination of the applicable penalty the court will have special consideration as to the value of the species, as well as the seriousness of the crime in which they were obtained, if this was known by the author. The maximum degree of the penalty established above will be imposed, when the author has incurred on a repetition of these facts or is a repeat offender.

It is important to emphasize that conceptually, it is possible to presume the doubtful origin of the goods that could eventually be acquired, through any means, whether formal or informal; and the buyer cannot disengage from his responsibility, regarding the origin and legality of the product purchased.

Examples:

- Buy items with no known or doubtful origin or whose price is much lower than the market price and that the good is used in the BancoEstado Corporation.

5) Disclosure of Confidential or Strategic Information

Description:

Unauthorized dissemination of any information that is not public knowledge and that is known by performing any function, advice or service to the Corporation, or use of any product, tool or other element that constitutes intellectual property of the BancoEstado Corporation.

Examples:

- *Filter information related to customers such as: contact data, customer signature database.*

- *Filter confidential information such as user passwords or alarm keys.*
- *Filter information protected by the Bank Secrecy and Reserve Law (bank account information, such as your movements and balances, credit information).*
- *In general, disclose confidential information in order to harm the Corporation, customers or third parties involved or use of confidential information for their own or third party's benefit, either directly or indirectly.*

6) Anticompetitive behaviors; any fact, act or convention that prevents, restricts or hinders free competition

Description:

Anyone who executes or celebrates, individually or collectively, any act or convention that prevents, restricts or hinders free competition or tends to produce such effects will be sanctioned.

Examples:

- The exchange of sensitive information between competitors such as; prices, compensation, discounts, sales, market share or investments that could serve as a basis for configuring a violation of free competition.

7) Incompatible negotiation

Description:

The public employee who will directly or indirectly be interested in any negotiation, action, contract, operation or management in which he or she must intervene because of his or her position.

The director or manager of a corporation that is directly or indirectly interested in any negotiation, action, contract, operation or management that involves the company, in breach of the conditions established by law, as well as any person to whom the applicable rules in matters of duties are established for the directors or managers of these companies. Crime linked to a conflict of interest by the party involved.

Example:

- An official participating in an evaluation commission of a process of contracting goods or services favors with his or her decision a third party associated with him or her, or his or her spouse or a close relative.

8) Corruption between Individuals

Description:

It sanctions those who request, accept, offer or give a bribe while exercising their work, to favor contracting with a bidder over another.

The employee or agent who will request or accept to receive an economic benefit or of another nature, for himself or a third party, to favor or to have favored in the exercise of his or her work the contracting with a bidder over another.

+The one who gives, offers or consents to give an employee or agent an economic or other benefit, for himself or to a third party, to favor or for having favored hiring with a bidder over another.

Example:

- Official who receives or requests a benefit (improper payment) to a provider of goods or services, to award said service over other providers that legitimately offer the same.

9) Undue appropriation

Description:

To those who, to the detriment of another, appropriate or divert money, effects or any other movable thing that they had received in deposit, commission or administration, or by another title that produces the obligation to deliver or return it.

Example:

- Leased goods not returned by the client, according to a contract with the Bank.

10) Unfair Administration

Description:

Anyone who is in charge of safeguarding or managing the assets of another person, or any part thereof, by virtue of the law, of an order of authority or of an act or contract, will be subject to damage or material loss, be it abusively exercising powers to dispose of or enforce it, either by executing or omitting any other action in a manner manifestly contrary to the interest of the owner of the affected estate.

Example:

- Senior Executive who, by administering the property of another owner, deceives and defrauds that company or society (minority shareholders, majority shareholders holding the assets that he/she manages, etc.), either by abusively executing its powers or omitting actions contrary to the interest of the owner of the affected estate.

11) Other type of fraud

Description

Any other type of fraud not contemplated above.

Example:

- *Lack of transparency in the selection and contracting of suppliers.*
- *Act as proxy or agent of clients in order to operate their accounts or perform any type of transaction on their behalf.*
- *Receive money, checks, vouchers on sight or any other type of documentation from the clientele, with the sole exception of tellers servicing their booths, either in payment of their accounts, in payment of collections, commissions, interests or payment of any other obligation in favor of the Bank, including as a favor or mandate.*
- *Any environmental crime.*