

# Anti-Corruption Management System / VCO

## POLICY

*“The VCO of CODELCO establish an effective business strategy in accordance with the code of ethnics, the strategic policy and the existing law, to maximize the production value and return on sales of CODELCO’s copper products and their by products.”*

**With regard to the anti-corruption management system, VCO promises:**

1. To prohibit and actively prevent the corrupt crimes stipulated in the existing law and all of the following practices: bribery, money laundering, terrorist financing, conflict of interest, unfair management, bribe-taking, corruption and accepting bribes in competitive negotiation.
2. To abide by the internal rules of the company concerning integrity and conflicts of interest and undertake the company’s criminal responsibilities.
3. To meet the objectives and requirements of the anti-corruption management system of VCO, take prevention and control measures, evaluate and monitor the implementation of such measures, and make continuous improvement.
4. To provide a credible and good environment, in order that the employee could truthfully report any violation that might endanger this policy with no need to worry about retaliation.
5. To involve the senior management of VCO in the establishment, implementation, maintenance and improvement of the anti-corruption management system.
6. To always appoint an anti-corruption management system specialist within the scope of VCO , whose function is to establish, implement, maintain and improve the anti-corruption management system and directly report to the crime prevention specialist.
7. To impose disciplinary or administrative punishments on the personnel who fails to comply with this policy according to the internal rules of the company.