

# CODE OF CONDUCT IN THE SECURITIES MARKET



**BancoEstado**  
desde 1855





## PURPOSE AND REGULATORY FRAMEWORK

The objective of this Code is to establish norms, procedures and behavioral guidelines, which properly guide the actions of staffers working in the field of securities markets.

Bearing in mind that BancoEstado, its affiliates and related companies, must carry out their commercial activities with strict adherence to the rules that govern them, the Code of Conduct has the primary purpose of preventing in said entities eventual conflicts arising from access to reserved or privileged information, particularly in relation to the operations carried out in the stock markets.

# AFFECTED ENTITIES

The Code of Conduct applies to BancoEstado and its subsidiaries BancoEstado S.A. Corredores de Bolsa and BancoEstado S.A. Administradora General de Fondos as an institutional investor or securities intermediary, by virtue of the fact that they carry out activities in the field of securities markets.

# AFFECTED PEOPLE

(According to the Securities Market Law)

Within the framework of Affected Entities, the following people will be subject to the rules of this Code:

- Whoever holds the character of related person(s).
- Whoever holds actual, presumed or virtual access to inside information.
- The entities of the Business Group to which the Affected Entity belongs.
- The parent company, affiliate, subsidiary or affiliate of the Entity Affected, as per Law N°18.046 of corporations.



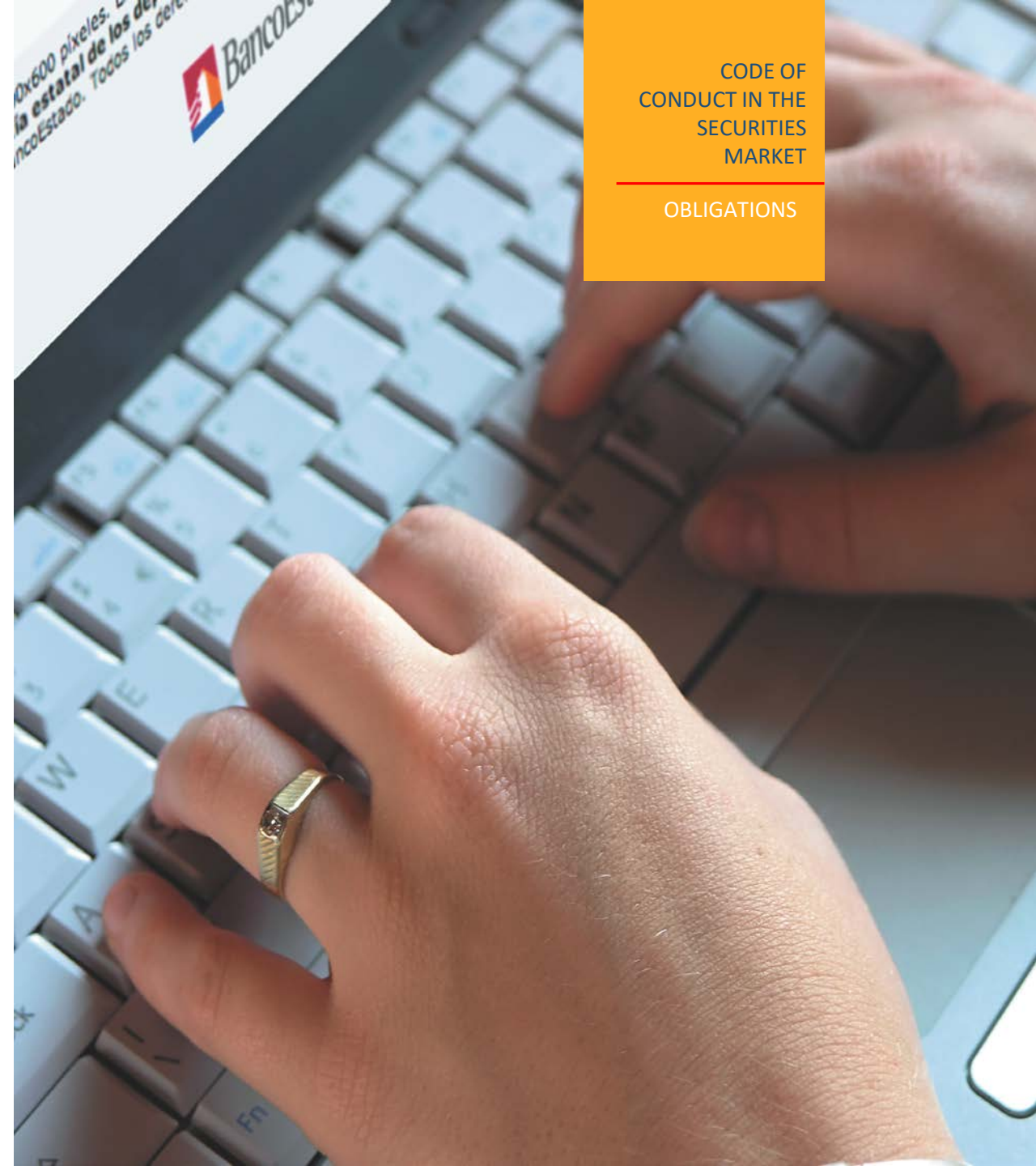
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AFFECTED  
ENTITIES

# OBLIGATION TO KEEP A RECORD OF TRANSACTIONS WITH RELATED COMPANIES

The Affected Entities will keep a record of the public offering of securities traded with their Related Persons or through their intermediary; said record will conform to the instructions given by the Commission for the Financial Market (CMF).

Related Persons will be understood as companies where board directors, managers or administrators of the Affected Entity hold a 50% ownership interest in the property, or they are directors or legal representatives of said entities.



## PREPARE A PAYROLL OF PERSONS WITH ACCESS TO PRIVILEGED INFORMATION

Privileged Information is “any information referring to one or several issuers of securities, their businesses or one or more securities issued by them, not disclosed to the market and whose knowledge, by their nature, is capable of influencing the price of the securities issued”.

Privileged Information will also be understood as awareness one has about acquisition or disposal operations to be carried out by an institutional investor in the stock market and whose status has been tagged reserved.

The Affected Entities will prepare a monthly payroll that includes all the people who have had or are presumed to have had access to Inside Information. The aforementioned payroll will be made available to the CMF, in the offices of the corresponding affected entity.

All persons of the Affected Entities who in the corresponding monthly period have had actual access to privileged information; also, all those persons who hold positions stated by the law and hold, presumably, access to this type of information, will be included in the payroll.

The obligation to comply with the regulations on privileged information extends up to one (1) year from the cessation of duties in the respective position.



## OBLIGATION TO REPORT TRANSACTIONS

Each Affected Entity must inform the Commission for the Financial Market (CMF) in the manner and time that it determines, every time the transactions of the indicated person(s) reach an amount equivalent in money to UF 500 (Unidades de Fomento).

The transactions that must be reported are stock shares and their options, bonds, promissory notes and purchases/sales with agreement; mutual fund installments must be informed each time they are made, regardless of the amount involved in each operation, excluding for this purpose the time deposits as well as savings plans.

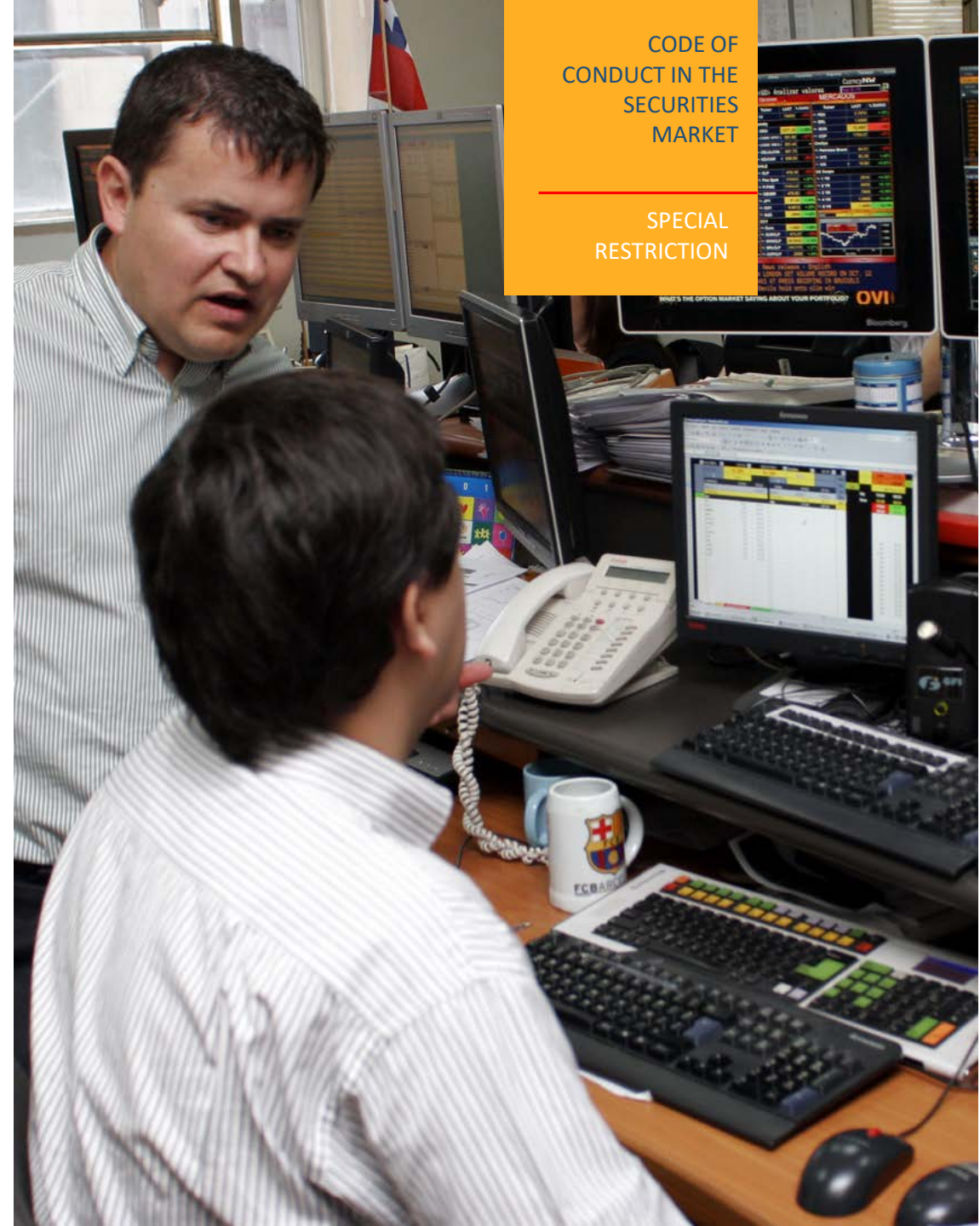
Transactions completed through a Portfolio Management are not required to be reported as long as said Affected Person does not directly intervene in the investment decisions and/or divestment of securities, a condition that must be expressly indicated in the corresponding contract.

# SPECIAL RESTRICTION FOR OPERATIONS OF BANCOESTADO STAFF AND CORREDORES DE BOLSA

Proxy agents, operators and employees of BancoEstado S.A. Corredores de Bolsa must carry out their operations on their own account (Article 64 of the Regulations of the Santiago Stock Exchange).

In the event that said company does not have the projected type of operation, it may complete through another authorized intermediary.

In either case, the affected person(s) must report the transaction to the General Manager of the subsidiary, which will send it to the Compliance Director.



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SPECIAL  
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## OBLIGATION TO REPORT TRANSACTIONS

People who participate in decisions and operations of acquisition and disposal of securities for institutional investors and securities intermediaries must report to the management of their business of any acquisition or disposal of public offering securities they carried out within 24 hours after the transaction.

Also, they must inform, to the extent they are aware of them, transactions carried out by people who are equal to their own, that is, operations carried out by the spouse, cohabiting or civil cohabiting person, regardless of the property regime, children under age, subject or not subject to their parental rights and children of legal age who depend economically on the person obliged to report transactions, whether or not they live with him/her, people who live in the same domicile and companies where directors, managers or administrators have, directly or through other companies, a participation in the property equal to or greater than 50%, or are directors or legal representatives of said companies.





## GENERAL RULES OF CONDUCT

The facilities of the Affected Entities in which activities related to securities are performed within the scope of the Securities Market Law or corporate business, will maintain among themselves the necessary autonomy, independence and detachment, to prevent conflicts of interest between them and avoid the use of reserved or privileged information on stock markets.

The Affected Persons must act with the utmost diligence and care regarding the Reserved or Privileged Information, and must control its use. Consequently, they must avoid the Undue or Unfair Use of Information, adopt Security Measures, report violations to the Compliance Department, avoid Price Collusion (they will refrain from preparing or carrying out practices that distort free pricing), accept gifts or other benefits and avoid conflicts of interest.

It will be up to the Compliance Director to answer any questions about the interpretation and/or application of these rules of conduct.



## DIRECTOR OF COMPLIANCE

The Compliance Director will be responsible for the distribution, interpretation and supervision of compliance behavior with the rules and procedures contained in this Code of Conduct at all Affected Entities.

## DUTY OF CONFIDENTIALITY

The Director of Compliance will make sure the confidentiality of the information and the testimonies the Affected Persons send him in compliance with this Code, using the necessary systems and procedures while abiding by the general rules of conduct.

## INFRINGEMENTS

Failure to comply with the Code of Conduct may result in administrative, labor (according to the Internal Regulations, Hygiene and Safety) and criminal responsibilities, without prejudice to civil liabilities for the damage caused.

Besides the consequences foreseen in the labor legislation, non-compliance with “Inside Information” rules is subject to administrative and criminal penalties in our legal system.



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[www.bancoestado.cl](http://www.bancoestado.cl)