

	Whistleblowing Policy	Version 1
		<u>Approval Date:</u> April 22, 2021

Whistleblowing Policy
LATAM LOGISTIC PROPERTIES, S.A.

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WHISTLEBLOWING POLICY OF LATAM LOGISTIC PROPERTIES (HEREINAFTER “LLP”)

1. PURPOSE:

Latam Logistic Properties, S.A. (hereinafter the “Company” and/or “LLP”) is committed to the highest standards of openness, honesty, and responsibility.

A major facet of responsibility and transparency is to have a mechanism to allow the Board of Directors, Board of Directors’ Committees, members of Upper Management, the Executive Director, all staff members, and other members of the Company to express their concerns responsibly and effectively.

A fundamental condition in any employment contract is that an employee must faithfully serve his or her employer and not disclose any confidential information about the employer’s affairs. Nevertheless, when a person discovers information that, in his or her judgment, demonstrates the existence of some sort of serious negligence or misconduct within the organization, that information must be disclosed internally without fear of any retribution and provisions must be adopted to do so without those provisions being dependent on Company management.

LLP guarantees and will not tolerate any retribution against people who report, denounce, or disclose any ethical problem or who help to resolve that problem.


It bears pointing out that the purpose of this policy (hereinafter the "Policy") is to assist people who believe they have discovered malpractice or something incorrect in the Company.

2. POLICY SCOPE

This Policy is designed to allow investors, shareholders, members of the Board of Directors, Upper Management, directors, employees, co-workers, and suppliers of the Company (hereinafter “People”) to be able to bring up their concerns internally at a high level and disclose information that the individual believes to demonstrate malpractice or impropriety.

The purpose of this Policy is to encompass the concerns that are of public interest and that may, at least initially, be investigated separately. Nevertheless, it may lead to innovation in other procedures, i.e., disciplinary procedures. These concerns may include:

1. Negligence, financial impropriety, or fraud.
2. Breach of a legal obligation or the statutes.
3. Hazards to health and safety or the environment.
4. Criminal activity.
5. Anticorruption
6. All labor practice issues such as harassment, bullying, discrimination
7. Code of Ethics and Business conduct breach
8. Improper conduct or unethical behavior.
9. Attempts to hide any of these matters.

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3. DEFINITIONS:

UPPER MANAGEMENT: The directors who participate in the day-to-day operations of the Company.

EXECUTIVE MEMBER: These are the legal representatives or the Upper Management members who participate in the company's day-to-day operations.

4. SAFEGUARDS

- a. Protection - this policy is designed to offer protection to those people who disclose their concerns about LLP actions provided that they file the report or allegation:
 1. In Good Faith - the reasonable belief by the person who reveals the demonstration of misconduct, violations of internal policies or impropriety or if they make the disclosure to the right person (see later in this document). It bears pointing out that no protection is provided as part of the internal disciplinary procedures for those people who decide not to use the procedure. In an extreme case, any malicious or bad-faith accusations could give rise to legal actions by the people who are being reported.
- b. Confidentiality - The Company will treat all of these disclosures confidentially and sensitively. The identity of the person who makes the allegation must remain confidential provided that it does not block or frustrate any investigation.
- c. No Retribution - LLP will in no way discharge, degrade, or discriminate against the people who report their concerns. In addition, it is important for people to not isolate the parties who have submitted their concerns. Anybody who believes that he or she has undergone retribution after submitting a concern related to compliance must take the matter to the attention of the Corporate Governance, Compliance, and Risk Committee. The line for contacting or reporting may also be used to discuss the matter of retribution.
- d. Anonymous Reports or Allegations - People may file a report anonymously without the need to reveal their personal data. These concerns will be taken into account to carry out the pertinent process.
- e. If a person makes an allegation in good faith that is not confirmed by a later investigation, no action will be taken against that person. When making a revelation, the individual must exercise proper care to ensure that the information is accurate. However, if a person makes malicious or degrading allegations and, in particular, if that person persists in doing so, disciplinary measures may be taken against that person.

5. REPORTING LINES

- a. LLP will provide the following measures to report any accusation, misconduct, or violation of the policies or the company law; b) protection against retributions; c) maintain confidentiality; and d) promote compliance with the law and the policies and fair treatment of shareholders, business partners, and co-workers.

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- b. This complaint channel will allow communication anonymously to be able to report illegal behavior and events against the policies. The Corporate Governance, Compliance, and Risk Committee will analyze this type of conduct and will take any pertinent measures.
- c. The reporting channel is: **Email: eticallp@dentons.com**
- d. **LLP can establish other mechanisms in the future.**

6. PROCEDURES TO FILE AND RECEIVE THE CLAIM OR ALLEGATION


- a. When the claim is received, the employee who receives it and takes note of it must transmit this information as soon as reasonably possible to the head of the investigation as designated by the Corporate Governance, Compliance, and Risk Committee.
- b. The claim will be investigated by the party who is designated by the pertinent Corporate Governance, Compliance, and Risk Committee unless the claim is against the Executive Director or somehow related to the Director's actions. In any such case, the complaint must be sent to the Company's Audit Committee for it to be sent and reported to the Corporate Governance, Compliance, and Risk Committee.
 - i. In the case of a complaint that is somehow related to an Executive Director, but not against the Executive Director, the Corporate Governance, Compliance, and Risk Committee will appoint a person in charge of carrying out the investigation along with an external party to act as an alternate investigator.
 - ii. Any complaints against the Executive Director must be sent to the Corporate Governance, Compliance, and Risk Committee, which will notify the Audit Committee, which will appoint a person in charge of the appropriate internal/external investigation.
 - iii. The Corporate Governance, Compliance, and Risk Committee must necessarily know about all of the claims and the parties responsible for handling or settling them or else send any complaints related to the following issues to the Audit Committee:
 - a. Significant cases of fraud;
 - b. Violation of internal controls by someone who has the role of implementing them in the Company;
 - c. A member of Upper Management;
 - d. Serious legal implications, damaged image, and/or reputation;
 - e. Interruption of the Company business.
- c. Should none of the channels mentioned above be appropriate or acceptable for the person filing the complaint, that person may go to one of the following people who have been designated and trained as independent points of contact within the framework of this procedure. They may advise the person filing the complaint about the consequences of the legislation and any possible internal and external complaint channels that may be available to them:
 - i. Director of Compliance;
 - ii. Corporate Governance, Compliance, and Risk Committee

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- iii. Audit Committee;
 - iv. President of the Board of Directors.
- d. If there is any proof of criminal activity, the head of the investigation must report it to the Corporate Governance, Compliance, and Risk Committee, which is responsible for instructing the contact person about the policy and immediately report it to the Audit Committee. When it has to do with members of the Board of Directors, Shareholders, or Upper Management, a third or key person must request approval from the Audit Committee. The Company will ensure that any internal investigation does not block a formal police or regulatory investigation.
- e. Timeframes
- i. Due to the varied nature of this type of claim, which may involve internal/external investigators and/or the regulatory agency, it is impossible to establish exact timeframes for any such investigation. The head of the investigation must ensure that the investigations are carried out as quickly as possible without it affecting the investigations' quality and depth.
 - ii. The head of the investigation must send a report as soon as possible with return receipt requested about the concerns of the party filing the complaint and then inform that party in writing about the results of the investigation and about any measures that are being proposed.
 - iii. If the investigation is prolonged, the head of the investigation must keep the person filing the complaint informed in writing of how the investigation is proceeding and about when it is likely for it to end. All of the responses to the person filing the complaint must be in writing and be sent to that party's residence with the indication "confidential."

7. INVESTIGATION PROCEDURE

- a. The head of the investigation must follow these steps:
- i. Obtain all the details and explanations related to the complaint.
 - ii. The head of the investigation must inform the employee who is the target of the complaint about the complaint as soon as possible. At the discretion of the head of the investigation, and depending on the circumstances of the complaint, the presence of an alternate representative may be allowed, i.e., the person's legal advisor.
 - iii. The head of the investigation must consider participation by the Company auditors and the investigative authority in this phase and must check with the Company's Corporate Governance, Compliance, and Risk Committee about whether it is necessary. The Corporate Governance, Compliance, and Risk Committee will inform the Audit Committee if necessary.
 - iv. Any accusations must be investigated in-depth by the head of the investigation with the assistance, when necessary, of other people/entities.

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- v. The head of the investigation will issue a finding about the complaint and whether or not it is valid. The finding will provide details in a written report that will contain the conclusions of the investigations and the reasons for the finding. The report will be transmitted to the Corporate Governance, Compliance, and Risk Committee which will in turn report to the Audit Committee as pertinent. When dealing with a complaint against a shareholder, the Executive Director, or member of the Board of Directors or of Upper Management must inform the Audit Committee, which in this case will assess the results, as pertinent.
 - vi. The Company's Audit Committee and the Corporate Governance, Compliance, and Risk Committee will decide which action should be taken. If it is shown that the complaint is justified, then the Company's disciplinary procedures or any other Company procedure that is appropriate will be brought into play.
 - vii. The party filing the complaint must be informed of the progress of the investigations, and, if appropriate, of the final result.
 - viii. If pertinent, a copy of the results will be used to be able to review the Company procedures.
 - ix. If the person filing the complaint is not convinced that his or her concern is being properly taken care of by the investigating employee, he or she has the right to take it in confidence to the Audit Committee or the Corporate Governance, Compliance, and Risk Committee or to the President of the Board of Directors or to any of the designated people who have been described previously.
- b. If the investigation determines that the allegations are not well-founded and if all the internal procedures have been exhausted, but the party filing the complaint is not satisfied with the result of the investigation, the Company acknowledges the legitimate rights of the Shareholders, members of the Board of Directors, Third Parties, Upper Management, and current and ex-employees to make revelations to the people or official bodies, even to external prosecutors or regulatory entities.

8. RELATED DOCUMENTS

- Code of Ethics
- Corporate Governance Code
- Policy on the Corporate Governance, Compliance and Risk Committee
- Conflict of Interest Policy
- Risk Policy
- Policy on Trafficking of Privileged Information
- Policy on Preventing Money Laundering

9. APPROVAL:

The Policy is binding and is complemented by the provisions established in the LLP corporate documents, particularly the Code of Ethics and the Compliance Program. This policy was properly approved by the LLP Board of Directors.

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Once it is approved by the Board of Directors, this Policy must be posted on the Company webpage.