



MANAGEMENT OF INFORMATION
OF INTEREST TO THE MARKET
HANDBOOK

Banco de Chile

1. Introduction.

On 31 December 2009, the *Comisión para el Mercado Financiero* [Financial Market Commission] issued Norma de Carácter General (NCG) [General Rule] No. 270, that “Sets Rules for the Dissemination of Policies and Procedures Related to the Acquisition or Disposal of Securities of the Entity and the Management and Disclosure of Information for the Market”. Under the said NCG, it was established, among others, the obligation for companies issuing publicly traded securities to adopt internal policies and rules on the type of information to be disclosed to investors and the systems implemented to ensure that such information is timely communicated.

The *Superintendencia de Bancos e Instituciones Financieras* [Superintendency of Banks and Financial Institutions], now *Comisión para el Mercado Financiero*, by means of Circular No. 3,499, dated 27 April 2010, adopted the NCG No. 270, in the terms indicated in its text, considering that banking institutions are also issuers of publicly traded securities.

In compliance with the provisions of the said regulations, the Board of Directors of Banco de Chile, in Meeting No. BCH 2,705, held on 29 January 2010, approved this “MANAGEMENT OF INFORMATION OF INTEREST TO THE MARKET HANDBOOK”, hereinafter the “Handbook”, which, duly updated, shall remain available to investors on its website (www.bancochile.cl) at its head office, and its offices or branches.

2. Purpose.

The purpose of this Handbook is to disclose to the securities market of the country the internal policies and rules of Banco de Chile referred to the type of information that will be

¹ Last version approved in Session of the Board No. BCH 3,007 dated 28 March 2024.

made available to general public investors, and the systems adopted so that it is timely communicated.

In addition, this Handbook establishes the behavioral criteria to be followed by its recipients to protect the information concerning the Bank that is accessed by reason of their capacity, position, activity, or relationship with the Bank.

The information that Banco de Chile must provide to foreign securities markets shall be carried out in accordance with the legal and/or regulatory provisions provided for in the respective jurisdiction.

3. Defined Terms.

(a) Information of Interest to the Market (“Information of Interest”): Information which, without being material or essential information, is useful for an adequate financial analysis of the entity, its securities, or the offer of such securities. All legal, economic, and financial information on relevant aspects of the development of the business of the entity, or that may have a significant impact on them, shall be understood to be included within this concept.

The qualification of an event as Information of Interest and its timely disclosure shall correspond to the Board of Directors of the Bank. However, if the Board of Directors does not meet in an extraordinary meeting, the General Manager shall always be entitled to qualify and disclose in a timely manner any Information of Interest, being necessary to have the favorable opinion of the Chairman of the Board, or of whoever surrogates him or her, in the case of events other than those mentioned in paragraph 10 of this Handbook.

(b) Material Information: Information that a prudent man would consider important to his investment decisions. Material information is all the facts or acts that result or may result in significant changes, both in the financial circumstances and in the management or administration of the Bank, as well as the penalties applied to the company for a breach of legal or regulatory provisions.

Under the provisions of Articles 9 and 10 of Law No. 18,045 on Securities Market, the Bank must disclose in a truthful, sufficient, and timely manner all facts or Material Information concerning itself, its businesses, and the securities it offers, at the moment the fact occurs or comes to its knowledge.

For a given fact to be qualified as Material Information, particular consideration shall be given to the definitions and events referred to by way of examples in Chapter 18-10 of the *Recopilación Actualizada de Normas* [Restated Regulations for Banks] of *Comisión para el Mercado Financiero* and other applicable rules.

The classification of an event as Material Information and its timely disclosure shall be the responsibility of the Board of Directors of the Bank. However, if the Board of Directors does not meet extraordinarily, the General Manager shall always be entitled to qualify and disclose in a timely manner any Material Information, being necessary to have the favorable opinion of the Chairman of the Board, or whoever surrogates him or her, in case of events other than those indicated by way of example in the aforementioned regulations of *Comisión para el Mercado Financiero*.

The facts or circumstances constituting Material Information shall be communicated to the *Comisión para el Mercado Financiero* and the Securities Exchanges following the instructions established for that purpose.

The Material Information must be communicated to the shareholders at the Ordinary Meeting of Shareholders, and all the events that occurred in the financial year must be informed.

(c) Insider Trading: Under the provisions of the Securities Market Law, insider trading is understood to be any information relating to one or more issuers of securities, their businesses, or one or more securities issued by them, not disclosed to the market and the knowledge of which, by its nature, is able to influence the trade of the securities issued. Insider trading shall also mean inside information which (i) the Board of Directors decides to communicate to the *Comisión para el Mercado Financiero* as reserved information, (ii) is maintained on decisions to purchase, dispose, and on the acceptance or rejection of specific offers from an institutional investor in the securities market, and (iii) is held in connection with an initial public offering of shares that have been entrusted to the securities intermediaries.

(d) Reserved Information: Material information that the Board of Directors of the Bank has agreed to treat as reserved pursuant to article 10 of Law No. 18,045 on the Securities Market. Only specific facts or circumstances relating to negotiations still pending which, when disclosed, may adversely affect the interests of the company may be classified as

reserved, and, to this end it is necessary the approval of three quarters of the board members in office.

The resolutions and agreements of this nature must be communicated to the *Comisión para el Mercado Financiero* on the business day following their adoption.

Once the relevant negotiation is completed, the Bank must disclose the relevant information.

(e) Confidential Information: Information that has been entrusted to certain related persons of the Bank, and that by its nature shall be kept in reserve given that its disclosure to third parties could be detrimental to the interests of the institution. Confidential Information includes but is not limited to, financial data or projections, technical information, plans of acquisition, disposal or merger, plans of expansion, strategies, relevant contracts, far-reaching changes in management and other corporate developments, as well as any other information that has been agreed to keep reserved pursuant to a confidentiality agreement.

4. Recipients

This Handbook is intended for the following persons:

(a) Board Members of the Banco de Chile, both Incumbents and Alternates;

(b) Advisers to the Board of Directors of Banco de Chile;

(c) The General Manager, Division Managers and other seniorexecutives of Banco de Chile;

(c) Workers dependents of the Bank who, without having the status of managers or senior executives, by the nature of their functions or due to their participation in certain processes, have or may have access to Information of Interest, Insider Trading, Reserved Information or Confidential Information; circumstance to be determined in each case by the General Manager;

(e) Permanent and occasional advisers who, by the nature of their functions or by participation in certain processes, have or may have access to Information of Interest, Insider Trading, Reserved Information, or Confidential Information.

5. Approval and amendments to the Handbook Competent Body.

This Handbook has been approved by the Board of Directors of Banco de Chile. In addition, amendments to the Handbook must be approved by the Board of Directors of the Bank, and shall become effective from its publication on the website of Banco de Chile, unless the Board of Directors agrees otherwise.

6. Responsible for enforcing the Handbook.

The General Manager, through the Global Compliance Division, is in charge of arranging the execution and implementation of the policies and rules established in this Handbook, as well as ensuring its supervision with the intervention of the Comptroller of the Bank. In addition, the General Manager must propose and inform the Board of Directors of any amendments to the Handbook that may be deemed relevant.

7. Dissemination and Training

The duties of the General Manager of Banco de Chile are:

(i) To submit a copy of this Handbook within 48 hours of its implementation or modification to the *Comisión para el Mercado Financiero*.

(ii) To instruct that a copy of the Handbook be maintained at all times available to investors at the head office and other offices or branches of the Bank.

(iii) To instruct the contents of this Handbook to be disseminated within the Bank, using for such purposes, among other means, the Institutional Intranet.

For the purposes of adequate dissemination and internal training on the contents of the Handbook, the General Manager may request to the Managers of Persons and Organization and/or of Global of Compliance.

8. Criteria applicable to the disclosure of transactions and the holding of securities issued by the Bank or by other companies belonging to its corporate group, carried out by Board Members, senior executives, and other persons related to such entities.

Banco de Chile complies with the current regulations on this matter, submitting to the *Comisión para el Mercado Financiero* the information established in the current regulations.

According to Article 12 of Law No. 18,045 on the Securities Market, the persons listed below, within the time limits established by the regulations in force, must inform the *Comisión para el Mercado Financiero* and each Stock Exchange established in the country in which the Bank has securities listed for trading, the acquisition or disposal of Bank shares, commitments and options for buying or selling shares of the Bank, and other contracts or securities whose price or outcome depends or is conditional, in whole or in a significant part, on the change or evolution of the price of such shares. The following persons are required to provide such information: (i) Those who directly or indirectly hold 10% or more of the shares of the Bank; (ii) Those who, as a result of an acquisition of shares, hold 10% or more of the shares of the Bank; and (iii) board members, liquidators, chief executives, the general manager and managers of the company, irrespective of the number of shares they hold.

9. Policy of Management of Insider Trading and Personal Investments

(a) The Board of Directors of Banco de Chile approved an “Institutional Policy of Administration of Insider Trading and Personal Investments”, hereinafter the “Policy”, which governs the administration of Insider Trading held by board members, advisers and employees of the Bank, and the procedures applicable to their personal investments in certain publicly traded securities and, in particular, in securities issued by Banco de Chile.

(b) According to the Policy, and without prejudice to the obligations of discretion and reserve under the law, all persons subject to this Policy are obliged to maintain strict reserve concerning any Insider Trading that they have knowledge of, or that they had access to by reason of their role, position, activity or relationship. To this end, such persons are subject to the following obligations and prohibitions:

(i) They shall not be able to use Insider Trading for their own or a third-party benefit.

(ii) They shall not be able to acquire or dispose of, for themselves or the Bank, directly through third parties, securities on which they have Insider Trading.

(iii) They shall not be able to avail themselves of Insider Trading to their gain or to avoid losses through any type of transaction in securities to which such Inside information relates to, or with instruments whose profitability is determined by such securities.

(iv) They shall refrain from communicating such information to third parties or from recommending the acquisition or disposal of the aforementioned securities, ensuring that this does not occur through their subordinates or trusted third parties.

(v) They shall not be able act through an *interposita persona*.

(vi) Neither they, nor their subordinates or trusted third parties, may perform a transaction using Insider Trading, either by acquiring or transferring, on its own account or of others, directly or indirectly, the securities to which that information relates to, or by canceling or modifying an order relating to those securities. Likewise, they shall refrain from communicating such information to third parties or from recommending the acquisition or disposal of the said securities.

(c) In addition, under the said Policy, employees of Banco de Chile and its subsidiaries with access to Insider Trading are subject to the following special obligations:

(i) They may not be able to dispose shares, bonds of local issuers, securities issued abroad by the latter, or securities issued abroad that are representative of local securities such as ADRs, within a period of 30 calendar days from their acquisition ("holding period"), unless within that period the respective instrument has fallen in price by 15% or more.

(ii) They must execute their personal transactions through the subsidiary Banchile Corredores de Bolsa S.A. when it is necessary to act through a securities intermediary.

(iii) They must report to the Global Compliance Division when it is necessary to add to the restricted list any transactions from customers that they become aware of in the course of their role, which is considered Insider Trading.

(iv) They must inform the Global Compliance Division of all acquisitions or disposals of securities made by them, their spouses, civil partners, partners, underage children and persons under their guardianship, any person living in their same household, and companies in which they have decisive influence to buy or sell securities.

(v) They must comply in a timely manner with the obligation to report in accordance with legal regulations, supplementary regulations, and the policies and procedures approved by the Board of Directors.

(d) Under the provisions of Article 16 of the Securities Market Law 18,045, board members, advisors of the Board of Directors, general manager, division managers, managers, senior executives and those who by reason of their position or functions perform or participate in the preparation, or have access to the financial statements of the Bank, as well as their spouses, civil partners, partners, and relatives up to the second degree of consanguinity or affinity, as well as entities controlled directly by them or through third parties, may not carry out, directly or indirectly, transactions on securities issued by Banco de Chile, within 30 days prior to the disclosure of the quarterly and annual financial statements of the Bank.

In addition, those who have or may have access to the financial statements of the Bank (including monthly statements of financial position and statements of profit and loss), prior to their public disclosure, shall not be authorized to carry out transactions in securities issued by Banco de Chile, for the period between the sixth day of each month and the time when the results of the previous month have been disclosed to the general public, either by the *Comisión para el Mercado Financiero* or by Banco de Chile itself. This restriction shall affect board members and advisors of the Board of Directors of Banco de Chile, the General Manager, Managers of Divisions, and those who by reason of their role or position participate in the elaboration or have access to the aforementioned financial statements.

Without prejudice to the foregoing, persons who, by virtue of their position, have access or may access financial information in advance of the date indicated above, either because they are directly involved in its preparation, or because they participate in its initial approval, shall be subject to a special block out period, which shall commence on the first business day of each month until the time when the results of the previous month are disclosed to the general public in the manner indicated above.

(e) The General Manager may temporarily prohibit the execution of specific transactions on issued shares by Banco de Chile with respect to persons who, through their activities, have access to Inside Information about them, in specific circumstances, such as in negotiations of merger or takeovers, for example.

(f) The above obligations and prohibitions apply in respect of any transaction in which persons subject to obligations or prohibitions intervene and, in addition, they apply to their spouses, civil partners, partners, underage children and persons under their guardianship,

custody, or representation, and companies in which they have decisive influence in the decision to purchase or sale of securities. The foregoing is without prejudice to the presumptions of access to Inside Information established by law.

10. Mechanisms of continuous dissemination of Information of Interest.

The Information of Interest determined by the Board of Directors or the General Manager shall be disseminated on the institutional website www.bancochile.cl. The following information shall be published on this site, among other matters:

(a) All press releases issued by the Bank.

(b) A copy of the Annual Report of the Bank.

(c) Presentations on the economic or financial situation of the Bank made to any group of investors.

(d) A copy of notices of summons to ordinary and extraordinary meetings of shareholders of the Bank.

Material information to the *Comisión para el Mercado Financiero* and Stock Exchanges will also be published in the Institutional Website.

11. Disclosure of Financial Information.

11.1 Regulatory framework:

In accordance with the legal provisions in force, the banks must use the disclosure criteria set by the *Comisión para el Mercado Financiero* and, in all matters that are not dealt with by the Commission or conflicts with its instructions, they must adhere to the generally accepted accounting criteria, which correspond to the technical standards issued by the *Colegio de Contadores de Chile A.G.* [Chilean Association of Accountants], consistent with the international accounting and financial reporting standards agreed by the International Accounting Standards Board (“IASB”).

Additionally, in the case of the release of financial information and disclosures to comply with the information requirements of the Securities and Exchange Commission of the United States of America (“SEC”), this information must be disclosed based on the rules issued by this agency.

For the preparation and disclosure of the financial statements of subsidiary companies, the rules laid down by the *Comisión para el Mercado Financiero* shall be used.

Finally, the Bank has a Policy of Financial Information Disclosure that was approved by the Board of Directors, which sets the guidelines and general criteria that the Bank must follow for the disclosure of financial information.

11.2 **Sources of Financial Information:**

Financial information shall be based on the accounting systems of the Bank and its subsidiaries, as well as on official sources used by the Bank for the administration and recording of information.

11.3 **Validation of External Auditors:**

The financial information of the annual financial statements and their respective notes, as well as the Report 20-F, shall be audited by the External Auditors appointed by the Meeting of Shareholders, who shall issue a supplementary report to said financial statements.

11.4 **Publication rules:**

(i) Banco de Chile shall publish the consolidated statement of financial position and the consolidated income statement on a monthly basis on its website, depending on their frequency, on the same day the reports are sent to regulators.

(ii) In the case of intermediate consolidated statements of financial position, the publication shall be made no later than the end date established by the *Comisión para el Mercado Financiero*. Such publication shall be made on the website of the Bank.

(iii) In the case of consolidated annual financial statements, the publication shall be made no later than on the deadline established by the *Comisión para el Mercado Financiero*. Such publication shall be made on the website of the Bank.

(iv) the Bank shall also publish annually, in a national newspaper, the statement of financial position and the income statement, and may exclude from that publication the comprehensive income statement, the statement of changes in the net worth, the statement

of cash flows, the explanatory notes and the report of the independent auditors which in all cases shall be published on the website of the Bank.

(v) Only the full consolidated financial statements of Banco de Chile with their respective notes shall be included in the annual report of the company.

12. Mechanisms for safeguarding Confidential Information.

In general terms, the measures for safeguarding the Confidential Information are as follows:

(a) The General Manager shall arrange for the maintenance of an up-to-date payroll of employees or external advisors with access to confidential information, for whom the provisions of this Handbook, and in particular the provisions of paragraph 9 above, shall also be binding.

(b) Any transfer of data and/or internal communications relating to this type of information must be carried out in writing or through electronic means duly safeguarded in the systems of the Bank.

(c) The Bank maintains duly safeguarded backups of all communications concerning Reserved and/or Confidential information through physical or electronic security means.

It shall be the responsibility of the recipient of any Confidential Information to take the necessary measures to safeguard the confidentiality of such information.

13. Representatives or official spokespersons of the Bank before third parties, and in particular before the media. Policy on relations with the media and cases where information about the Bank appears in them.

The official spokesperson for investors of the Bank is the General Manager, who may delegate his or her authority to other managers of divisions of the Bank.

It shall be the responsibility of the Chairman of the Board, the General Manager, and the Manager of Institutional Relations, and Chief Economist to make any communication or statement that the Bank may decide to make in its relations with the media.

14. Penalties and Conflict Resolution.

(a) Application of Sanctions.

(i) Failure to comply with this Handbook shall be considered as a possible failure to the duty of loyalty and reserve that is inherent to the employment contracts of managers, senior executives, and employees of the Bank subject to its provisions. Penalties applicable to managers, executives and other workers to whom it is applicable for violation of this Handbook executed by them directly or indirectly, shall be those determined by the General Manager; (ii) In the case of the violation of this Handbook by external advisors, the appropriate legal and contractual rules shall apply; (iii) In the case of directors and other related persons who have no subordination link with the Bank, the legal rules shall apply.

(b) Conflict resolution.

Any disputes and inquiries that may arise in connection with this Handbook shall be resolved by the Board of Directors or the General Manager, depending on their nature.

15. Duration.

This Handbook shall enter into effect on 1 February 2010.