

Assessment of Company Expectations 2025/26

Company adherence to the Expectations for EITI supporting companies

Company name	SQM
Sector	Mining
Headquarters	Santiago, Chile
Type	Publicly listed
Date of submission to company (month/year)	January 2026
PREAMBLE <i>MSG Participation</i>	<i>Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). This data is collected for information purposes.</i>
Does the company participate in a multi-stakeholder group?	Yes
If yes, indicate in which countries the company is participating in MSGs?	Chile
Secretariat comment on MSG participation	<p>The Secretariat notes SQM's proactive engagement in the multi-stakeholder group (MSG) in Chile.</p> <p>The secretariat thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries and encourages supporting companies to take part in MSGs in the EITI implementing countries in which they operate.</p>
EXPECTATION 1 <i>Public support for the EITI</i>	<i>Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.</i>

Does the company publish a statement of support for the EITI and the objective of the EITI Association?	Yes
URL for Statement Support	Spanish: https://sqmlitio.com/wp-content/uploads/2025/03/politica-corporativa-de-sostenibilidad-de-sqm-salar-spa.pdf English: https://sqmlitio.com/en/sostenibilidad/politica-de-desarrollo-sostenible/
Secretariat's assessment on Expectation 1	Expectation met
Secretariat comment	Statement of support published. See URL p. 2.
EXPECTATION 2 <i>Disclosures in accordance with the EITI Standard</i>	<i>Make comprehensive disclosures in accordance with the EITI Standard in all EITI implementing countries where the company or its controlled subsidiaries operate. Where not disclosed in other company reporting, publicly disclose a list of controlled subsidiaries operating in the oil, gas or mining sectors in EITI implementing countries.</i>
Does the company publish a list of controlled subsidiaries?	Yes
URL for controlled list of subsidiaries	Annual Report 2024: https://ir.sqm.com/static-files/11668031-0cd2-468e-8bde-cd56a235f701
EITI implementing countries where the company operates.	CHILE
Does the company make disclosures in accordance with the EITI Standard or in relation to EITI implementing countries?	N/A
Secretariat's assessment on Expectation 2	Expectation met

<p>Secretariat comment</p>	<p>SQM discloses a list of controlled subsidiaries. See URL p. 240-251.</p> <p>SQM only operates in Chile. As Chile only joined the EITI in September 2025 and, therefore, there have not been any EITI mandated reporting or disclosures required of companies for this assessment, the company is not expected to contribute to any disclosures in EITI implementing countries during the period under review.</p>
<p>EXPECTATION 3 <i>Disclosure of taxes and payments in non-EITI implementing countries</i></p>	<p><i>Publicly disclose taxes and payments to governments at a project level in line with the EITI Standard in all non-EITI implementing countries where the company operates unless disclosure is not feasible. Where not feasible, the country-specific legal or practical barriers to disclosure should be publicly explained.</i></p>
<p>Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates upstream in the oil, gas and mining sectors?</p>	<p>Yes</p>
<p>URL to disclosures of taxes and payments to governments in non-EITI implementing countries</p>	<p>2024 Financial Statements: https://ir.sqm.com/static-files/829aae50-fdc9-4e60-a689-a20d138bd8c3</p>
<p>Are the disclosures disaggregated by project?</p>	<p>No</p>
<p>Secretariat's assessment on Expectation 3</p>	<p>Expectation partially met</p>
<p>Secretariat comment</p>	<p>The company discloses aggregated taxes and payments to governments in non-EITI implementing countries in its consolidated financial statements note 26. See URL p. 165 - 174.</p> <p>The company does not disclose taxes and payments to governments disaggregated by project.</p>

	The Secretariat did not verify whether project-level disaggregation in all non-EITI implementing countries was adequate, as definitions vary across jurisdictions.
EXPECTATION 4 <i>Commodity trading transparency</i>	<i>Companies buying oil, gas and/or mineral resources from the state in EITI implementing countries, disclose volumes received and payments made in line with the EITI Standard and the EITI reporting guidelines for companies buying oil, gas and minerals from governments unless disclosure is not feasible.</i>
Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?	No
If yes, which countries?	N/A
Does the company make disclosures in line with the EITI Standard and reporting guidelines?	N/A
URL for disclosure(s)	N/A
Secretariat's assessment on Expectation 4	Expectation not applicable
Secretariat comment	SQM does not buy oil, gas and/or mineral resources from the state in EITI implementing countries.
EXPECTATION 5 <i>Disclosure of audited financial statements</i>	<i>In line with the EITI Standard, publicly disclose audited financial statements, or the main items (i.e., balance sheet, profit/loss statement, cash flows) where financial statement are not available.</i>
Does the company disclose its audited financial statements?	Yes
URL audited financial statements	Financial Statements 2024: https://ir.sqm.com/static-files/829aae50-fdc9-4e60-a689-a20d138bd8c3

Secretariat's assessment on Expectation 5	Expectation met
Secretariat comment	SQM discloses audited financial statements. See URL.
EXPECTATION 6 <i>Beneficial ownership transparency</i>	<i>Publicly declare and publish support for beneficial ownership transparency and publicly disclose beneficial owners in line with EITI Standard, recognising that listed companies will disclose the name of the stock exchange, include a link(s) to stock exchange filings where they are listed and otherwise do what is required by applicable regulations and listing requirements.</i>
Does the company publish a statement of support for beneficial ownership transparency?	No
URL for statement of support for Beneficial Ownership	N/A
Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?	Yes
Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange	New York Stock Exchange, Santiago Stock Exchange
URL to stock exchange	Stock Quote Webpage: https://ir.sqm.com/equity/stock-quote NYSE: https://www.nyse.com/quote/XNYS:SQM SSE A: https://www.bolsadesantiago.com/resumen_instrumento/SQM-A SSE B: https://www.bolsadesantiago.com/resumen_instrumento/SQM-B

<p>URL for recent beneficial ownership disclosures</p>	<p>Form 20-f: https://ir.sqm.com/static-files/dc09cdd9-040d-44eb-a0ae-fd629932f25b</p> <p>2024 Annual Report: https://ir.sqm.com/static-files/dc09cdd9-040d-44eb-a0ae-fd629932f25b</p>
<p>Secretariat's assessment on Expectation 6</p>	<p>Expectation partially met</p>
<p>Secretariat comment</p>	<p>SQM does not publish a statement of support for beneficial ownership transparency.</p> <p>Company discloses beneficial owners in line with applicable regulations and listing requirements. SQM is publicly listed on the New York Stock Exchange and the Santiago Stock Exchange. See URLs.</p> <p>SQM discloses its major shareholders in item 7.A of its 20-F form. See URL Form 20-F pg. 116. The company discloses further information regarding its shareholders within its 2024 Annual Report. See URL 2024 Annual Report pgs. 12, 13, 203, 204.</p> <p>To make further progress on Expectation 6, please publish a statement of support for beneficial ownership transparency.</p>
<p>EXPECTATION 7 <i>Due diligence processes and anti-corruption policies</i></p>	<p><i>All EITI supporting companies are expected to engage in rigorous due diligence processes and publish an anti-corruption policy setting out how the company manages corruption risk, including how the company collects and takes risk-based steps to use beneficial ownership data regarding joint venture partners, contractors, and suppliers in its processes.</i></p>
<p>Does the company publish an anti-corruption policy?</p>	<p>Yes</p>
<p>URL to the policy</p>	<p>Anti-Bribery and Corruption Policy: https://ir.sqm.com/static-files/f65b59e0-517e-4b91-af10-8fb50391ae1b</p> <p>SQM Code of Ethics: https://ir.sqm.com/static-files/2eeeb082-c0c8-4297-beea-acb39fd07db3</p> <p>Code of Ethics SQM Iodine Plant Nutrition: https://ir.sqm.com/static-files/19b21521-0797-4fd1-a4b3-d79cd45430c5</p> <p>Policy on Conflict of Interest: https://ir.sqm.com/static-files/231c036e-1032-4621-939f-3f3f5c3cf0a3</p>

	<p>Code of Conduct for SQM's Iodine Plant Nutrition: https://ir.sqm.com/static-files/cbbc4a77-adf8-405b-8b86-2316d6b2714f</p>
<p>Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of beneficial ownership data?</p>	<p>Partial</p>
<p>Secretariat's assessment on Expectation 7</p>	<p>Expectation partially met</p>
<p>Secretariat comment</p>	<p>The company publishes an anti-corruption policy. See URLs.</p> <p>SQM's anti-corruption framework partially sets out how the company manages corruption risk through the identification and use of beneficial ownership data. Across its policies and codes, the company establishes prohibitions on corruption, bribery, improper payments, and inappropriate interactions with public officials or PEPs. The Anti-Bribery and Corruption Policy sets out the main principles governing expected conduct, while the SQM Code of Ethics and the Code of Ethics Iodine Plant Nutrition expand on these themes by addressing donations, commercial courtesies, and interactions with public officials, including example scenarios illustrating potential corruption risks. These documents focus primarily on bribery and improper conduct and do not describe due diligence procedures or the collection or use of beneficial ownership data.</p> <p>The Policy on Conflict of Interest identifies situations that could create conflicts involving collaborators, suppliers, third parties, clients, and distributors, requires declaration of such conflicts, and describes the procedures for addressing them. The Code of Conduct for SQM's Iodine Plant Nutrition includes concise anti-corruption provisions aligned with those in the Anti-Bribery and Corruption Policy. The company's Sustainability Report 2024 describes the company's due diligence processes for new business relationships, mergers, and joint ventures, stating that it evaluates ethical risks and analyses potential findings to</p>

	<p>determine a third party's risk level. However, the report does not specify whether beneficial ownership data is collected or used in these processes.</p> <p>The Secretariat encourages the company to strengthen its anti-corruption policy by clarifying how it collects and uses beneficial ownership data in its management of corruption risks to achieve fully met in this Expectation.</p>
<p>EXPECTATION 8 <i>Contract transparency</i></p>	<p><i>Publicly declare and publish support for governments' efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard, and contribute to public disclosure of contracts and licenses in EITI implementing countries consistent with government procedures.</i></p>
<p>Does the company publish a statement of support for contract transparency?</p>	No
<p>URL for statement of support for contract transparency</p>	N/A
<p>Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?</p>	N/A
<p>Secretariat's assessment on Expectation 8</p>	Expectation not met
<p>Secretariat comment</p>	<p>SQM does not publish a statement of support for governments' efforts to publicly disclose contracts and licenses.</p> <p>The company is not assessed for its contribution to the disclosure of information on contracts and licenses in EITI implementing countries. As Chile only joined the EITI in September 2025 and, therefore, there have not been any EITI mandated reporting or disclosures required of companies for this assessment, the company is not expected to contribute to any disclosures in EITI implementing countries during the period under review.</p>

	The company is encouraged to publish a statement of support for governments' efforts to publicly disclose contracts and licenses to fully meet this Expectation.
EXPECTATION 9 <i>Gender Diversity</i>	<i>Publish a commitment and/or policy on gender diversity in the oil, gas or mining sectors and support reporting by EITI implementing countries under the EITI Standard by disclosing employment in the sectors disaggregated by gender.</i>
Does the company publish a commitment/policy on gender diversity?	Yes
URL for commitment/policy on gender diversity	2024 Annual Report: https://ir.sqm.com/system/files-encrypted/nasdaq_kms/assets/2025/06/12/2-37-42/MEMORIA%20SQM%202024_eng.pdf
Does the company disclose employment data disaggregated by gender?	Yes
URL for gender disaggregated employment data	2024 Annual Report: https://ir.sqm.com/system/files-encrypted/nasdaq_kms/assets/2025/06/12/2-37-42/MEMORIA%20SQM%202024_eng.pdf 2024 Sustainability Report: https://sqmlitio.com/wp-content/uploads/2025/09/reporte-sostenibilidad-2024.pdf
Secretariat's assessment on Expectation 9	Expectation met
Secretariat comment	SQM publish a commitment and/or policy regarding gender diversity. See URL 2024 Annual Report pg. 61. SQM publishes employment data disaggregated by gender in its 2024 Annual Report and Sustainability Report. See URLs for Annual Report pgs. 66-74 and Sustainability Report pgs. 82-85. SQM reports on their gender pay gap in its 2024 Annual Report. See URL p. 75.