

Crime Prevention Model (CPM)



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1. INTRODUCTION AND PURPOSE

Law 20,393 (the “Law”), dated December 2, 2009, establishes and regulates the criminal liability of legal entities with respect to the crimes of **money laundering (“ML”), terrorism financing (“TF”), bribery (“BR”), handling of stolen property (“HSP”), incompatible negotiation (“IN”), bribery between individuals (“BBI”), misappropriation (“MA”) and unfair administration (“UA”)**. The crimes of IN, BBI, MA and UA were added to the Law through the passing of Law No. 21,121, published in the Official Gazette on November 20, 2018. The crime of polluting water and others related to the fishing industry were added to the Law when Law No. 21,132, published in the Official Gazette on January 31, 2019, took effect. These latter crimes are not applicable to Compañía Sud Americana de Vapores S.A. (the “Company” or “CSAV”) and, therefore, they are not included in this Crime Prevention Model (“CPM”).

Legal entities will be held liable for these crimes when the following circumstances occur (article 3):

1. When these are committed directly and immediately in the interest or for the benefit of the legal entity. Subsequently, legal entities will not be held liable if the crime (ML, TF, BR, HSP, IN, BBI, MA or UA) is committed exclusively for the personal benefit of the perpetrator (or accomplice or accessory), or in favor of a third party other than Compañía Sud Americana de Vapores S.A. (“CSAV” or the “Company”);
2. When such crimes are committed by its owners, controllers, managers, chief executives, representatives or those who perform administrative activities, or by individuals under the direct supervision of any of the above, and
3. When the crime is committed as a result of the company failing to comply with its management and supervisory duties. Regarding this point, this article (subsection 3) considers that management and supervisory duties have been met when, before the crime is committed, the legal entity has adopted and implemented *organizational, management and supervision* models to prevent such crimes. Article 4 of the Law establishes that for the purposes of subsection 3 of article 3 above, legal entities may adopt the prevention model cited therein, which must contain the items indicated later in this document.

Subsequently, the present CPM adopted by CSAV and approved by its Board of Directors, is designed to comply with the aforementioned provisions. As a result of this, CSAV will only be criminally liable, by Law, if the persons for whom it is liable commit any of the crimes of ML, TF, BR, HSP, IN, BBI, MA or UA, for the exclusive benefit of CSAV, and if it fails to comply with its duties to supervise and control the actions of its personnel.

CSAV declares that it has functions, systems, applications, processes, policies, procedures, instructions (dictated by different Company units or bodies), protocols, manuals and regulations

(specifically, its Internal Order, Hygiene and Safety Regulations and its Corporate Code of Compliance and Ethics).

CSAV also has a Legal Compliance Officer (“LCO”), who is responsible for internal control, audit, and compliance within CSAV and whose functions go beyond preventing the crimes established by the Law, namely: ML, TF, BR, HSP, IN, BBI, MA and UA. For example, the LCO also supervises compliance with CSAV’s internal regulations regarding the prevention of anticompetitive conduct.

The LCO reports directly to the Directors’ Committee and the Board. The LCO may make general or specific recommendations to Management and to any Company body, including the Board of Directors and shareholders at a Shareholders' Meeting.

It is important to note that CSAV’s policy has been to develop its business in full adherence of the law, seeking ongoing improvement of its commercial and operational systems and processes, thus ensuring permanent improvement of the quality and reliability of its services, together with ongoing supervision and control of its activities, orientation and training of its personnel, and the rational use of state-of-the-art technology.

Notwithstanding this document’s purpose of complying with the provisions of the Law referring to the crimes classified as ML, TF, BR, HSP, IN, BBI, MA and UA, CSAV's prevention system is also applicable to the risks of not complying with antitrust laws. Therefore, all persons to which this CPM applies may also report any suspicious activity that may violate antitrust laws, following the complaint procedure contained in section 9 of this document. The above is in accordance with the Corporate Code of Compliance and Ethics, which considers compliance with those regulations as part of the CSAV Group's mission.

2. SCOPE OF APPLICATION

2.1 Regarding Individuals

This CPM applies to all individuals that are part of CSAV, including those with a labor relationship with CSAV, its owners, partners, shareholders, directors, executives, advisors and representatives, as well as the Company's service providers and/or suppliers.

CSAV's domestic service providers and/or suppliers (except those regulated by any public body or with which it has entered into adhesion contracts) must sign a declaration stating they are aware of the CPM (known as, COMPP. No. 2: CPM-related Declarations point 1 “**CPM Declaration**” – “**Declaración de MPD**”).

As for foreign service providers and/or suppliers with which CSAV engages, this declaration is not required. However, they will be informed that CSAV has adopted a crime prevention system. Additionally, at the start of the process of hiring a foreign service provider and/or supplier, the counterparty's degree of compliance with matters such as preventing corruption and terrorism

financing should be checked. The area within CSAV related to this provider or supplier will be responsible for this check and must promptly inform the LCO of the outcome.

2.2 Regarding Other Laws and Regulations

This CPM is complementary and will be mandatory along with local laws and regulations. If there is any concern regarding the compatibility between the former and the latter, the respective individual defined in number 2.1. above must report this to the LCO of CSAV.

This CPM contains references to general policies and regulations, and therefore each person must stay informed of the specific obligations and procedures applicable to the given place and activity.

Even so, there are aspects and situations that may not be described in this CPM or in any other document. In these cases, the individual must inform themselves and consult with the LCO regarding any concerns he/she may have in reference to this CPM.

2.3 Regarding Territory

In keeping with the provisions of articles 5 and 6 of the Chilean Penal Code, Chilean criminal law is only applicable in national territory (including the territorial sea), and crimes committed outside Chile will not be punishable in Chile (except in specific cases determined by law). Therefore, the Law only applies to national territory (principle of territoriality of criminal law). However, this CPM as well as its control and compliance mechanisms are mandatory for all CSAV employees, including those working abroad.

3. CSAV COMPLIANCE PLAN

CSAV has adopted a Comprehensive Risk Management Policy, approved by its Board of Directors, which contains, among others, the following elements:

- (i) Risk management procedure.
- (ii) Risk profile.
- (iii) High-level risk inventory.
- (iv) Process map, with its relevant operational risk matrices.
- (v) For purposes of this CPM, and in compliance with the Law, legal compliance risks are an integral part of the Comprehensive Risk Management Policy and are grouped into a special category called "Compliance Risk Matrix".

In terms of controls, the following Compliance Procedures ("COMPP") are applicable to the CPM (COMPP. No. 1) and considered part of it in the form of appendices:

COMPP. No. 2: CPM-related Declarations.

COMPP. No. 3: Compliance Risk Matrix.

COMPP. No. 4: Investment and Financial Risk Management Policy.
COMPP. No. 5: Corporate Code of Compliance and Ethics.
COMPP. No. 6: Internal Order, Hygiene and Safety Regulations (“IOHSR”).
COMPP. No. 7: Market Information Manual (“MIM”).
COMPP. No. 8: Know Your Third Party Procedure (“KY3P”).
COMPP. No. 9: Compensation and Benefit Policy.

The following are also part of the CPM:

- Administration and Financial Management Policies and Procedures.
- Information Security Policies (IT).
- CSAV Audits (Internal and External).

4. CRIME PREVENTION MODEL (“CPM”)

CSAV's Crime Prevention Model contains, among other items:

- (i) The crime prevention policy for ML, TF, BR, HSP, IN, BBI, MA and UA;
- (ii) The appointment of an autonomous prevention officer equipped with the resources and the means to act, called the Legal Compliance Officer or LCO;
- (iii) The establishment of a CSAV system for preventing the aforementioned crimes (i.e.: ML, TF, BR, HSP, IN, BBI, MA and UA); and
- (iv) Explanations regarding supervision and certification of the crime prevention system.

5. CRIME PREVENTION POLICY

The Company has adopted a policy for preventing the crimes contained in the Law, as well as other infractions and legal irregularities derived from CSAV's Principle of Legality. This Principle consists of the following:

“CSAV has decided to develop its business in keeping with the prevailing legality in the areas where it operates.

Consequently, each individual must observe the laws and regulations applicable to CSAV, as well as those provisions dictated by the Company's higher bodies, designed to comply with current legality.

CSAV does not expect, nor does it require, that its workers and personnel perform their duties in violation of the law, even under the pretext of efficiency and good service.”

Notwithstanding the fact that criminal law only refers to the crimes of ML, TF, BR, HSP, IN, BBI, MA and UA, any act that is intended, related or that contributes to such activities is considered an essential and serious violation of CSAV's Principle of Legality.

6. CRIME PREVENTION OFFICER

CSAV has appointed an autonomous crime prevention officer equipped with the resources and the means to act, called the Legal Compliance Officer or LCO.

Article 4, No. 1 of the Law establishes that the model for the prevention of crimes penalized by it must include designating a prevention officer, who is equipped with the necessary operating mechanisms and tools, on behalf of the legal entity's highest administrative authority, in order to perform such a duty. The prevention officer will remain in the position for up to three years, at which time his/her appointment may be renewed.

In Session No. 5639, on January 29, 2013, CSAV's Board of Directors approved the creation of the position of Legal Compliance Officer (LCO) and appointed someone to this position. The bylaws of this session are contained in Minutes No. 131 of the Company Directors' Committee, dated January 30, 2013, according to which, the LCO will be the Prevention Officer ("PO"), for the purposes of Article 4, No. 1, letter a) of the Law.

6.1 LCO Autonomy

The LCO is appointed by CSAV's Board of Directors for a three-year term, which can be extended for equal three-year periods. The LCO can communicate directly with CSAV employees online, by phone, by email and through the website. The LCO is not required to work exclusively in this position.

The LCO is autonomous with respect to the Chief Executive Officer and other Company management. Company management and employees must fully collaborate with the LCO in performing his/her duties.

6.2 LCO Resources, Means to Act and Access to Management

Regarding material resources and means, the LCO has a permanent budget, systems and procedures established for carrying out duties. If, upon implementing this CPM, additional material resources and means are needed, CSAV's Board of Directors has arranged for these to be requested from Company Management.

The LCO can access any information and documentation from Management, which should collaborate and provide whatever is within its power. In addition, the LCO is authorized to make general or specific recommendations to Management and other CSAV bodies.

In practice, the LCO reports on matters pertaining to his/her position and management directly to the Directors' Committee, whose sessions he/she attends on a regular basis (as a general rule s/he attends all ordinary sessions), and is accountable for initiatives implemented in terms of compliance, developments, any infractions or irregularities detected, as well as the matters

themselves and those relating to the legal risks on the matrix, controls and training on these matters. The LCO reports to the Directors' Committee and this report is recorded in the respective meeting minutes.

In addition, the LCO reports on all activities to the Company's Board of Directors at least twice a year. This report will include all activities, any risk situations detected and complaints received.

7. CRIMES RELATED TO THE CPM

CSAV has established a crime prevention system for the crimes of ML, TF, BR, HSP, IN, BBI, MA and UA.

7.1 Definition of Crimes Referred to in the Law and Included in this CPM

The Law penalizes the crimes of ML, TF, BR, HSP, IN, BBI, MA and UA committed by legal entities. The following section contains the legal provisions that address these crimes.

(i) **Money Laundering** (article 27 of Law No. 19,913 to Create the Financial Analysis Unit and Modify Several Provisions Regarding Asset Laundering and Bleaching):

Article 27.- It will be punishable by long-term imprisonment (minimum to medium degree) and a fine of two hundred to one thousand monthly tax units:

a) Anyone who in any way hides or conceals the illicit origin of certain goods, knowing that they come directly or indirectly from the perpetration of acts that constitute one of the crimes in Law No. 20,000, which penalizes illegal trafficking of narcotics and psychotropic substances; in Law No. 18,314, which defines terrorist conduct and sets the penalty; in article 10 of Law No. 17,798, on arms control; in Title XI of Law No. 18,045, on the securities market; in Title XVII of decree with force of law No. 3 from the Finance Ministry, of 1997, the General Banking Law; in article 168 regarding article 178, No. 1, both from decree with force of law No. 30, from the Finance Ministry, of 2005, that approves the consolidated, coordinated and systematized text of decree with force of law No. 213, from the Finance Ministry, of 1953, the Customs Ordinance; in subsection two of article 81 of Law No. 17,336, on intellectual property; in articles 59 and 64 of Law No. 18,840, the constitutional organic law of the Chilean Central Bank; in the third paragraph of number 4 of article 97 of the Tax Code; in paragraphs 4, 5, 6, 9 and 9 bis of Title V and 10 of Title VI, all from the Second Book of the Penal Code; in articles 141, 142, 366 quinquies, 367, 374 bis, 411 bis, 411 ter, 411 quater, 411 quinquies, and articles 468 and 470, numbers 1, 8 and 11, in relation to the final subsection of article 467 of the Penal Code or, also, fully aware of said origin, for hiding or concealing these goods.

b) Anyone acquiring, owning, possessing or using such assets with the intention of profiting from them that is aware of their illicit origin when he/she receives them.

The same punishment will apply to the conducts described in this article if the goods come from an act carried out abroad that is punishable in the place where it was committed and that in Chile constitutes one of the crimes stated in letter a) above.

For the purposes of this article, goods are considered objects of any type appreciable in money, corporeal or incorporeal, personal property or real estate, tangible or intangible as well as the documents or legal instruments that accredit ownership or other rights on them.

If the perpetrator of any of the conducts described in letters a) or b) is unaware of the origin of the goods due to inexcusable negligence, the prison punishment in accordance with the first or last subsection of this article will be reduced by two degrees.

The circumstance that the origin of the goods is a classified, illegal act of those indicated in letter a) of the first subsection will not require a prior guilty judgment and may be established in the same proceedings to rule on the crime classified in this article.

If the perpetrator or accomplice of the act from which such goods originated is also convicted of the crime contemplated in this article, he/she will also be penalized for this crime accordingly.

In any case, the punishment of imprisonment applicable in the cases in letter a) and b) may not exceed the maximum punishment allocated by law to the perpetrator of the felony or misdemeanor from which the goods involved in the crime contemplated in this article came, notwithstanding any fines and accessory punishments that are appropriate in conformity with the law.

(ii) **Terrorism Financing** (article 8 of Law No. 18,314 that determines terrorist conduct and sets the penalty):

Article 8.- Anyone who, by any means, directly or indirectly, requests, collects or provides funds to be used in committing any of the terrorist crimes indicated in article 2, will be punished with medium-term imprisonment in the minimum degree, unless by virtue of the provision of funds he/she is liable for a given crime, in which case he/she will be penalized by the latter, notwithstanding the provisions of article 294 bis of the Penal Code.

(iii) **Bribery** (articles 250 and 251 bis of Penal Code):

Article 250.- Anyone who gives, offers or consents to give a public employee an economic or other benefit to benefit them or a third party, due to the employee's position in the terms of subsection one of article 248, or for them to perform or omit acts as indicated in articles 248, subsection two, 248 bis and 249, or for having performed or omitted them, will be punished with the same fines and bans established in those provisions.

Regarding benefits given, offered or consented to due to the public employee's position in the terms of subsection one of article 248, the briber will also be punished with medium-term imprisonment in the medium degree if convicted of giving or offering the benefit and medium-term imprisonment in the minimum degree if convicted of consenting to the benefit.

Regarding benefits given, offered or consented to in relation to the actions or omissions in subsection two of article 248, the briber will also be punished with medium-term imprisonment

in the medium to maximum degree if convicted of giving or offering the benefit and medium-term imprisonment in the minimum to medium degree if convicted of consenting to the benefit.

Regarding benefits given, offered or consented to in relation to the actions or omissions in article 248 bis, the briber will also be punished with medium-term imprisonment in the maximum degree to long-term imprisonment in the minimum degree if convicted of giving or offering the benefit and medium-term imprisonment in the medium to maximum degree if convicted of consenting to the benefit.

Regarding benefits given, offered or consented to in relation to the felonies or misdemeanors in article 249, the briber will also be punished with medium-term imprisonment in the maximum degree to long-term imprisonment in the minimum degree if convicted of giving or offering the benefit and medium-term imprisonment in the medium to maximum degree if convicted of consenting to the benefit. The punishments foreseen in this subsection will apply notwithstanding other punishments that should also be given for committing the felony or misdemeanor in question.

Article 251 bis.- Anyone who, with the purpose of obtaining or maintaining for him/herself or a third party any business or advantage in the area of any international transaction or economic activity carried out abroad, offers, promises, gives or consents to give a foreign public official an economic or other benefit to benefit him/her or a third party, due to the official's position, either to omit or execute, or for having omitted or executed an act particular to his/her position or that violates the duties of his/her position, will be punished with medium-term imprisonment in the maximum degree to long-term imprisonment in the minimum degree and also with a fine of two to four times the benefit offered, promised, given or requested, and temporary absolute ban from public positions or offices in their maximum degree. If the benefit were of a nature other than economic, the fine will be from one hundred to one thousand monthly tax units.

The goods received by the public official will always be confiscated.

Comment: The term public official includes judges, experts, representatives of the judiciary, officials of the executive or legislative branch, municipal, district and tax authorities of the State, of autonomous administration (Comptroller General of the Republic, Central Bank, etc.) of the Armed Forces, Ambassadors, Consuls and accredited agents of state entities, governments, international or supranational organizations, non-governmental organizations (NGOs) and of any state entity, as well as foreign public officials or those who work for the aforementioned authorities and agencies.

(iv) **Handling Stolen Property** (article 456 bis A of the Penal Code):

Article 456 bis A.- Anyone that, knowing its origin or capable of no less than knowing it, has in his/her power, at any title, property that is stolen or the object of cattle theft, of handling of stolen property or of misappropriation from article 470, number 1, and transports, purchases, sells, transforms or markets it in any way, even when he/she has already disposed of it, will be penalized

with medium-term imprisonment in any degree and a fine of five to one hundred monthly tax units.

In determining the applicable punishment, the court will particularly consider the value of the property, as well as the seriousness of the crime from which they were obtained, if this was known by the perpetrator.

When the handled stolen property is motor vehicles or things that are part of utility or residential supply networks, such as electricity, gas, water, sewage, rain water collectors or telephone, he/she will receive punishment of medium-term imprisonment in its maximum degree and a fine equivalent to the value of the vehicle's fiscal appraisal or the punishment of medium-term imprisonment in its maximum degree and a fine of five to twenty monthly tax units, respectively. The guilty judgment for crimes in this subsection will order confiscation of the instruments, tools or means used to commit them or to transform or transport the stolen elements. If those elements are stored, hidden or transformed in any commercial establishment to owner or administrator's knowledge, the court may also order definitive closure of that establishment by notifying the competent authority.

Notwithstanding the preceding subsection, the maximum prison term indicated there and a fine equivalent to double the fiscal appraisal will be applied to the perpetrator of handling of motorized vehicles that knew or is capable of no less than knowing that one of the conducts described in article 439 was committed against the legitimate holder in appropriating it. The provisions of this subsection will not be applicable to anyone who, for the same act, is considered a responsible participant in any of the hypothesis of the crime of robbery set forth in article 433 and subsection one of article 436.

The maximum degree of punishment established in subsection one will be imposed when the perpetrator is a multiple or repeat offender of such crimes. In cases of multiple or repeat incidents of handling the stolen property indicated in subsection three, the punishment of imprisonment established therein will be applied, increased by one degree.

Regarding the crime of cattle theft, the fine established in subsection one will be seventy-five to one hundred monthly tax units and the judge may order definitive closure of the establishment. If the value of the handled stolen property were to exceed four hundred monthly tax units, the court will impose the maximum degree of the punishment or the maximum corresponding punishment for each case.

(v) **Incompatible Negotiation** (article 240 of the Penal Code):

Article 240.- The following will be punishable by medium-term imprisonment in the medium to maximum degree, temporary absolute bans from public positions, employment or offices in the medium to maximum degree and a fine of half the value of the interest taken in the deal:

1 A public employee that takes a direct or indirect interest in any negotiation, act, contract, transaction or procedure in which he/she has to intervene due to his/her position.

2 An arbitrator or commercial liquidator that takes a direct or indirect interest in any negotiation, act, contract, transaction or procedure in which he/she has to intervene in relation to the assets, things or capital interests he/she is responsible for awarding, partitioning or managing.

3 An inspector or liquidator in a bankruptcy proceeding that takes a direct or indirect interest in any negotiation, act, contract, transaction or procedure in which he/she has to intervene in relation to the assets or capital interests he/she is responsible for safeguarding or promoting.

In this case the provisions of article 465 of this Code will apply.

4 An expert that takes a direct or indirect interest in any negotiation, act, contract, transaction or procedure in which he/she has to intervene in relation to the assets or things he/she is appraising.

5 A guardian or executor that takes a direct or indirect interest in any negotiation, act, contract, transaction or procedure in which he/she has to intervene in relation to the estate of his/her wards and testamentary obligations under his/her charge, thus failing to comply with the conditions established by law.

6 Anyone in charge of safeguarding or managing all or part of the estate of another person who is impeded from managing it, that takes a direct or indirect interest in any negotiation, act, contract, transaction or procedure in which he/she has to intervene in relation to that estate, thus failing to comply with the conditions established by law.

7 A director or officer of a corporation that takes a direct or indirect interest in any negotiation, act, contract, transaction or procedure involving the corporation, thus failing to comply with the conditions established by law, as well as any person governed by rules regarding duties established for directors or officers of these corporations.

The same punishments will be imposed on the persons listed in the preceding subsection if, under the same circumstances, he/she gave or let an interest be taken by, when he/she should have impeded it, his/her spouse or civil partner, a relative of any degree in a straight line or up to the third degree in a collateral line, whether by blood or affinity.

The same will hold if any of the persons listed in subsection one, under the same circumstances, gave or let an interest be taken by, when he/she should have impeded it, third parties related to them or with the persons indicated in the preceding subsection, or corporations, partnerships or companies in which he/she, those third parties or other persons exercise powers of administration in any form or have a corporate interest, which must be greater than ten percent if the company were a corporation.

(vi) **Bribery between individuals** (articles 287 bis and 287 ter of the Penal Code):

Article 287 bis.- Any employee or representative that requests or agrees to receive an economic or other benefit, for him/herself or a third party, to favor or for having favored in exercising his/her duties the contracting of one bidder over another will be penalized with medium-term imprisonment in the medium degree and a fine of double the benefit requested or accepted. If the benefit were of a nature other than economic, the fine will be from fifty to five hundred monthly tax units.

Article 287 ter.- Anyone who gives, offers or consents to give an employee or representative an economic or other benefit, for him/herself or a third party, to favor or for having favored the contracting of one bidder over another will be punished with medium-term imprisonment in the medium degree, in the case of giving or offering a benefit, and with medium-term imprisonment in the minimum degree, in the case of consenting to a benefit. In addition, he/she will be penalized with the fines indicated in the preceding article.

(vii) **Misappropriation** (article 470 No. 1 of the Penal Code):

Article 470.- The punishments of imprisonment in article 467 will also apply:

1. To anyone who, to the detriment of others, appropriate or embezzle money, goods or any other tangible object that has been received in custody, commission or management or for any other reason that produces an obligation to hand it over or return it.

For proof of deposit in the case referred to in article 2,217 of the Civil Code, the provisions of that article will be followed.

(viii) **Unfair Administration** (article 470 No. 11 of the Penal Code):

Article 470.- The punishments of imprisonment in article 467 will also apply:

11. To anyone charged with safeguarding or managing the estate of another person, or any part of it, by virtue of the law, an order from authorities or an act or contract, who inflicts damage, whether by abusively exercising his/her powers of disposal on behalf of them or binding them to do so, whether by executing or omitting any act that is expressly contrary to the interests of the owner of the affected estate.

If the act were to affect the estate of a person for which the subject is trustee, guardian or executor, or of an incompetent person that is a ward of the subject of another nature, the court will impose the maximum or maximum degree of the punishments indicated in article 467.

If the trust estate were a publicly held or special corporation, any administrator engaging in any of the conducts described in the first paragraph of this number and inflicting damage on the corporate capital will be penalized with the punishments indicated in article 467, increased by one degree. In addition, the court will impose the punishment of special temporary ban in the minimum degree as manager, director, liquidator or administrator, at any title, of a corporation or company supervised by a Superintendency or the Financial Market Commission.

In the cases set forth in this article, the court will also impose a fine of half of the amount of the fraud.

Record is left that the identification of the risks related to the crimes contained in this CPM, and the controls--defining responsible parties--as well as evidence of and the frequency of said controls, are detailed in the Compliance Risk Matrix (COMPP. No. 3) approved by the Company's Risk Committee.

7.2 Identification of CSAV Activities or Processes that May Generate or Increase the Risk of Committing These Crimes

CSAV has identified all its activities by mapping macroprocesses, processes and subprocesses. This includes detailed process flows for the most relevant activities.

Regardless of whether or not detailed flows of a particular process are found, the compliance risks of the processes are surveyed, and compliance control points (known as CCPs) are identified, at the very least for those activities that present a risk of non-compliance with a severity greater than “significant”, based on the risk profile.

These CCPs explain the controls in place to mitigate the risk of failing to comply with the Law, as part of the CPM.

This is in addition to all the CPM mechanisms and procedures mentioned above.

7.3 CSAV's System of Joint Powers and Dual Signature

The Company's Board has bestowed powers of representation, organized based on a matrix structure, assigned to different proxies at a manager and deputy manager level, who can only act jointly with another proxy of the same or another group, depending on the act in question and its amount, which is set in the principle of dual signature. Only in exceptional cases may an individual act alone.

This is notwithstanding the legal and conventional faculties of the CEO of CSAV.

7.4 Penalties

Legal or regulatory infractions, or behavior that violates business integrity or ethics, this CPM or its appendices will be penalized with one or some of the following penalties:

- (i) Verbal warning;
- (ii) Written warning, with no copy sent to the worker's records;
- (ii) Written warning, with a copy sent to the worker's records;
- (iv) A fine of up to 50% of the worker's monthly remuneration;
- (v) Suspension from position, if convicted, for up to three months, without pay;
- (vi) Termination of work contract, where relevant as per labor law or applicable standards;
- (vii) Penalties established in the Company's IOHSR and in applicable labor law, which are considered compatible and cumulative with those established in this CPM; and,
- (viii) Other administrative, criminal or civil sanctions established in the law or laws that are applicable to the infraction in question, including compensation for damages.

Disciplinary authority, and the resulting imposition of a penalty, corresponds to the CEO of CSAV (notwithstanding the role of the Board of Directors), and does not exclude the exercise of compensatory actions and rights and others on behalf of the Company, or its personnel, workers, agencies and officials, taken against the responsible party(ies).

Any violation of or non-compliance with this CPM, the procedures in its appendices or the current regulations on matters addressed herein will be the exclusive responsibility of the person that commits it, without giving rise to any type of liability for CSAV. As a result, the provisions of this CPM will be understood, where relevant, to be complemented by the contents of the rest of the documents that comprise the CSAV Compliance Plan (section 3 of this document).

8. ROLES AND RESPONSIBILITIES

8.1 Board of Directors

CSAV's Board is responsible for:

- (i) Appointing the LCO to his/her position and/or relieving him or her from it, as established by the Law. The Board may extend the appointment every three years for periods of equal duration.
- (ii) Providing or authorizing provision of the means and resources necessary for the LCO to fulfill his/her roles and responsibilities, as a function of CSAV's size and economic capacity.
- (iii) Approving the text of the CPM and its amendments.
- (iv) Ensuring correct implementation and effective operation of the CPM.
- (v) Receiving and analyzing reports on the management and functioning of the CPM presented by the LCO at least every six months.
- (vi) Informing the LCO of any observed situation related to the Law and management of the CPM.
- (vii) Deciding whether to certify the CPM.

8.2 Chief Executive Officer

CSAV's Chief Executive Officer is responsible for:

- (i) Ensuring correct implementation and effective operation of the CPM within the Company.
- (ii) Providing the information requested by the LCO to perform his/her duties in relation to CPM implementation, operations and effectiveness.
- (iii) Informing the LCO of any observed situation related to the Law and management of the CPM.
- (iv) Supporting the LCO by ensuring unrestricted access to information and people as well as helping coordinate activities particular to the CPM in required areas, such as investigating claims and carrying out personnel orientation and training sessions.
- (v) Supporting the LCO by collaborating on the implementation of necessary controls in any area at CSAV in order to mitigate the risks identified in the Compliance Risk Matrix or report any new risk that comes to his/her knowledge that has been identified within the Company.

8.3 LCO

The LCO is responsible for:

- (i) Fulfilling the role of Crime Prevention Officer, as established by the Law, and in accordance with the powers defined for the position.
- (ii) Ensuring the correct establishment and operation of the CPM.
- (iii) Ensuring that processes and activities within CSAV have the effective crime prevention controls referenced in the CPM and maintaining a record of evidence of compliance and execution of these controls.
- (iv) Proposing to the Board the means and resources necessary to fulfill his/her role and responsibilities.
- (v) Training the Company's workers in matters under the scope of the Law and all other topics considered relevant to thoroughly fulfilling his/her role.
- (vi) Reporting twice a year to the Board on his/her management, activities, any risk situations detected and complaints received. Likewise, the LCO must report on a monthly basis to the Directors' Committee regarding these same topics.
- (vii) Suggesting, developing and implementing any other policy and/or procedure deemed necessary to complement the CPM.
- (viii) Permanently evaluating the effectiveness and validity of the CPM and its conformity with the Laws and other regulations and informing the Board of the need and convenience of any amendments.
- (ix) Being familiar with and analyzing all complaints or unusual or suspicious transactions learned about through any means. For the purposes of the analysis, the LCO must gather all documentation related to that operation, generating for such purposes a file with background information or a complaint file.
- (x) Documenting and safeguarding evidence regarding crime prevention activities.
- (xi) Leading the CPM certification process and representing CSAV with broad powers before the certifying entity.
- (xii) Following up on recommendations or instructions from the certification process or regulators.

9. COMPLAINT PROCEDURE

There is a procedure that all people covered by this CPM can use to report violations or suspicious activities regarding the committing of crimes, in addition to any suspicious activity that may violate laws or CSAV internal rules (antitrust, conflicts of interest, related party transactions, etc.).

Complaints may be made anonymously or a claimant may choose to identify him/herself. However, the claimant may ask that the LCO withhold his/her name from parties other than the courts of justice.

The complaint procedure may be substantiated through diverse channels, at the claimant's discretion. These channels are:

- (i) By email to: canal.etico-csav@csav.com, CSAV's Ethics or Complaint Channel. The LCO must always be able to instantaneously access the cited complaint email.
- (ii) By mail addressed to the LCO: letter sent to the Company's registered address at Hendaya 60, 14th floor, Las Condes, Metropolitan Region.
- (iii) On CSAV's webpage: www.csav.com.

There will be no formalities for the complaints and priority will be given to ensuring that these can be delivered quickly and are serious. To ensure his/her seriousness, complaints must include a brief description of the activities and events reported and suspected, the date and place of occurrence, the name of the possible parties involved and any other information held by the claimant that is useful for the LCO.

The LCO must meet with any person reporting a complaint about suspicious activities of the commission of the crimes referenced in this CPM as soon as possible and in no more than 3 business days. If outside the city of Santiago, within a period not exceeding 48 working hours, the LCO will make it possible for the claimant to contact him/her by phone or in any way deemed appropriate. If the LCO is outside Chile, or in a place without permanent telephone access, the time frame indicated above will increase to 72 working hours.

Regarding complaints made by email canal.etico-csav@csav.com, the LCO must acknowledge receipt via email within 48 business hours of receipt, unless the LCO is not in Chile, in which case he/she will have up to 72 business hours to acknowledge receipt.

The LCO, wherever possible, when deemed that it will not damage the investigation, and when identification is provided, will notify the claimant of activities carried out and the status of the complaint. Providing such information will be conditional upon, when appropriate, the claimant committing in writing to maintain strictly confidential, under his/her exclusive responsibility, everything communicated by the LCO regarding the complaint.

The LCO, in his/her monthly ordinary report to the Directors' Committee and biannual report to the Board of Directors, must report all complaints lodged and actions carried out as a result of complaints received in the preceding period. Notwithstanding, in the case of complaints that withhold the identity of the claimant, confidentiality will be maintained in these reports. If no complaints have been filed, this must also be reported.

The LCO will ensure that all complaints received are processed and resolved within no more than 45 calendar days. This term could be extended by justified decision of the Board, with prior recommendation from the LCO.

In cases in which the defendant has some degree of kinship (by blood or affinity), or is friends and/or has some other type of commercial or economic relationship with the LCO, the latter must

abstain from knowing, investigating and resolving the case, and must give the information to the Chief Executive Officer, who will replace him/her for this case in particular.

The LCO will have all the means and tools necessary to begin to process, on time and in the proper way, any complaints received, always safeguarding the rights of both the claimant and the defendant.

10. POLITICALLY EXPOSED PERSONS (“PEP”)

Pursuant to the provisions of numeral IV of Circular 049/2012 of the Financial Analysis Unit (“FAU”), for the purposes of this section, Chileans or foreigners who hold or have held noteworthy public offices in a country will be considered politically exposed persons (“PEP”) during their term and for at least one year following the end of their exercise.

Regarding the aforementioned, it is understood that in Chile at least the following should be classified as PEP, without this statement being restrictive:

- 1) President of Chile.
- 2) Senators, Representatives and Mayors.
- 3) Ministers of the Supreme Court and the Courts of Appeals.
- 4) Ministers of State, Undersecretaries, Intendants, Governors, Regional Ministerial Secretaries, Ambassadors, Superior Service Chiefs, both centralized and decentralized and the immediate superior manager who steps in for each of them.
- 5) Commanders-in-Chief of the Armed Forces, the General Director of Carabineros Police, the General Director of Investigations Police, and the immediate superior officer who steps in for each of them.
- 6) National District Attorney of the Public Ministry and Regional District Attorneys.
- 7) Comptroller General of the Republic.
- 8) Councilors of the Chilean Central Bank.
- 9) Councilors of the State Defense Council.
- 10) Ministers of the Constitutional Court.
- 11) Ministers of the Anti-monopoly Court.
- 12) Primary and alternate members of the Public Procurement Court.
- 13) Councilors of the High Public Management Council.
- 14) Directors and senior executives of public companies, as defined by Law 18.045.
- 15) Directors of public limited corporations appointed by the State or its agencies.
- 16) Members of the Governing Boards of political parties.

This category includes spouses, blood relatives to the second degree, and individuals with whom PEPs have entered into a joint-action agreement through which they have sufficient voting power to influence companies incorporated in Chile.

In all contracts signed between domestic service providers or suppliers and the Company, the contracting party or its legal representative, in the case of legal entities, will be requested to sign a Declaration to determine PEP status or the existence of a family relationship with such person (known as COMPP No. 2: CPM-related Declarations point 2 **“PEP Declaration” – “Declaración PEP”**), notwithstanding CSAV's right to request such Declaration from any third party with which it engages.

Consequently, it will be mandatory for the respective department or, in its absence, the Company's treasury area, to require domestic service providers or suppliers to sign **CPM declarations** (COMPP. No. 2: CPM-related Declarations point 1) **and PEP**.

In his/her reports on compliance to the Directors' Committee and the Board, the LCO must inform them of the existence of binding contracts with domestic service providers or suppliers of CSAV that are PEPs.

11. RELATED PARTY TRANSACTIONS (“RPT”)

11.1 Related Party Registry (“RP”)

The Company has adopted a procedure coordinated by the Administration and Finance Department to identify all persons considered to be related parties, restricted to number 1) to 3) of article 146 of Law No. 18,046, the Corporations Act (“CA”).

As part of that procedure and to enable the administrator of the CSAV shareholder registry (DCV Registros S.A.) to inform the Financial Market Commission (“CMF”) of the share transactions referred to in article 20 of Law No. 18,045, the Securities Market Act (“SMA”), the Company's directors and chief executives/managers are asked to prepare and send the Administration and Finance Department a document containing: (i) the full names and identification numbers of their spouses and children; (ii) a list of companies in which they, their spouses or blood relatives up to the second degree are directors, managers, administrators, chief executives or liquidators; and (iii) all companies in which they, their spouses or the relatives indicated above directly or indirectly own 10% or more share capital or can designate at least one director.

Once this information has been received, the Company sends it to DCV Registros S.A., to update the related party registry.

11.2 Registry of RTs

CSAV, through its Administration and Finance Department, maintains a registry of all Related Transactions (RTs) carried out by the Company. The main RTs are disclosed in the respective note in the consolidated financial statements.

11.3 RTs for Immaterial Amounts

At ordinary meeting No. 5691, held on February 26, 2016, CSAV's board authorized its management to engage in transactions with related parties for immaterial amounts (article 147 letter a) of the CA). Before that, at ordinary meeting No. 5631, held on June 26, 2012, it approved the Policy on Customary Related Party Transactions currently in force (article 147 B) of the CA). Although some RTs, under certain conditions, are not required to adhere to the requirements and procedures established in numbers 1) to 7) of article 147 of the CA, they must aim to contribute to the corporate interest and comply with market conditions prevailing at the time they take place. The Company's Board left record of the latter when it made the agreements related to article 147 letters a) and b) of the CA. The Superintendency of Securities and Insurance (presently the CMF) was informed of the referenced Policy on Customary Related Party Transactions, as an essential event, on June 26, 2012.

Management reports to the Directors' Committee at least once per year all RTs considered exceptions based on the aforementioned agreements. Nevertheless, Management may ask the Committee to review background information before entering into the respective transaction.

11.4 RTs Procedure

In conformity with subsection 8 of number 3 of article 50 bis of the CA, CSAV's Directors' Committee examines the background information on the transactions referred to in Title XVI of that same act and then reports to the Board, the managerial body that ultimately approves or rejects such transactions, always taking as a foundation the Committee's opinion.

To analyze the RT, Management prepares the background information for each transaction. To review the background information on each transaction, the Directors' Committee and the Board consider: (i) whether it aims to contribute to the corporate interest, (ii) that its price, terms and conditions comply with those prevailing in the market at the time of analysis (since conditions at time of approval are evaluated by the Board) and (iii) that it meets the requirements established in article 147 of the CA.

12. CONFLICTS OF INTEREST AT CSAV

Conflicts of interest at CSAV are managed in accordance with the Company's Corporate Code of Compliance and Ethics.

13. PUBLICATION, DISTRIBUTION AND TRAINING

The LCO, in conjunction with CSAV's Management, must distribute this CPM to the Company's personnel, instruct and train them on these matters and, in general, on all matters of compliance.

This CPM should be published on CSAV's intranet for the knowledge of and distribution to all personnel.

The obligation of knowing and abiding by it must be incorporated into the employment contracts of all personnel. Similarly, it must be considered in contractual conditions with domestic service providers and/or suppliers, in the context of the provisions of title 2. of the CPM.

Additionally, it should be distributed through the means determined for the purpose, to ensure implementation in conformity with labor laws and other applicable regulations.

Training will be periodic and carried out as follows:

- (i) New worker orientation, which may be in person or online.
- (ii) Period training for workers, whether relevant or not, at least once per year. Specialized training will be provided for individuals in high-risk roles. This also applies to members of the Board.
- (iii) Training will be coordinated by the LCO with assistance from the Administration and Finance Department. The LCO will determine the minimum content of the orientation and training sessions on the CPM and the compliance function at CSAV.
- (iv) Attendance will be taken at training and orientation sessions by signing an attendance sheet.

14. CPM OVERSIGHT

The LCO must work to ensure efficient application of control mechanisms within the Company; detect and manage correction of failures and adaptation to needs, risks and difficulties affecting CSAV's business or industry, especially those related to its legal environment.

In this same sense, each time there are non-conformities or corrective actions need to be implemented, the LCO will manage compliance within the Company. Likewise, the LCO must monitor the degree of compliance of the different areas regarding internal/external metrics, action plans, Management guidelines, etc. To accomplish this, he/she may request assistance from each of the areas considered pertinent to fully fulfill his/her function.

In all matters deemed necessary by the LCO, because of having identified control weaknesses or opportunities for improvement, comments or suggestions will be made, which must be implemented as a complementary control activity. The design of the new control activity will be prepared in accordance with CSAV's Comprehensive Risk Management Model. The LCO will be responsible for monitoring implementation and execution.

15. CPM CERTIFICATION

The existence of a crime prevention model and its certification serve as means of legal proof if the Company were ever investigated in a potential case of having committed any of the crimes in the Law. Despite the fact that the law does not force legal entities to adopt and implement these

models, it does establish that they will be liable for the commission of these crimes when they are the result of failure by legal entities to comply with their duties of management and supervision.

In light of this, CSAV has adopted, implemented and certified its CPM.

16. VALIDITY OF CPM

CSAV's CPM was certified for the crimes of bribery, money laundering, terrorism financing, handling of stolen property, incompatible negotiations, bribery between individuals, misappropriation and unfair administration, by BH Compliance Limitada on October 14, 2020, for a two-year period.

The text of this CPM and its Compliance Procedures (COMPP) were approved by the Company's Board in ordinary meeting No. 5752 on June 26, 2020.

Santiago, October 2020.