

# CRIME PREVENTION HANDBOOK

Version N°3



# CRIME PREVENTION HANDBOOK

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## I. INTRODUCTION

The agreements signed by the Republic of Chile in the framework of its entry into the Organization for Economic Cooperation and Development (OECD), as part of its fulfillment of various requirements for membership, is that was issued the law that "establishes the criminal liability of legal persons in the crimes of Money Laundering, Financing of Terrorism, Bribery and Reception that it indicates".

Compañía Agropecuaria Copeval S.A., and its subsidiaries, abiding by the laws that regulate the Companies as soon as possible, must implement a series of measures indicated by law to comply with it.

Compañía Agropecuaria COPEVAL SA, and its subsidiaries, need to develop and implement all the considerations included in Chilean Law N°20.393 so that the company complies with the duties of direction and supervision, and thus exempt itself from corporate criminal liability before the potential commission of one or more of these crimes of money laundering, financing of terrorism, bribery committed by a national or foreign public employee, and reception, committed by any of the employees enunciated in article 3 of said Law, and additional felonies added since its promulgation.

Sanctions are avoidable in the company through the adoption and previous implementation of models of organization, administration and supervision to prevent established crimes. The rules of this Handbook, complement, but do not replace the provisions contained in the respective Internal Regulations,

Policies and Procedures of the Company, which are equally applicable to all workers of this.

It is the obligation of all employees, executives and directors subject to this Handbook to know, observe, comply with and fully enforce its regulations.

References Documents of the Crime Prevention Handbook:

- Law 20.393: Criminal liability of legal persons in the crimes of money laundering, financing of terrorism, bribery, receiving, incompatible negotiation, corruption among individuals, misappropriation, unfair administration, introduction of pollutants, use of prohibited hydrological resources, misappropriation of benthic resources and reception of hydrobiological resources.
- Code of Ethics and Business Behavior of Copeval. Version 3, 2019.

## II. CORPORATE PILLARS

### OUR VISION

"To be the most integral, innovative and profitable company in the supply of agricultural and forestry inputs and services to transform Chile into an agro-food power".

### OUR MISSION

"To be the organization that generates the greatest contribution to the competitiveness of the Chilean agricultural sector permanently over time, generating economic value for its customers, shareholders, suppliers and employees".

### OUR VALUES

What represents us and what we commit as an organization:

- Excellence in customer service.
- Entrepreneurial spirit and leadership.
- Training and permanent education for our employees.
- Integrity and ethics in all our actions.
- Respect for people and their beliefs.
- Respect for laws and rules.
- Respect for the environment.
- Be a contribution to the community.

### CORPORATE BEHAVIOR

What we expect from our employees to meet the objectives of the organization:

- Teamwork culture.
- Customer service orientation.
- Results orientation.

- Initiative in daily work.
- Innovation as a contribution to continuous improvement.
- Professionalism in doing things well.
- Discipline in adherence to internal and external regulations.
- Permanent search for greater efficiency.

## III. STRATEGIC OBJECTIVES

- To have the best human team in the entire industry: professional, competent, with great capacity for teamwork and shared values.
- Supply all the inputs and services required by the national agricultural sector. Integration with specialization.
- Deliver the best integral service to the client by adding a culture of continuous improvement in all processes.
- Be a leader in all markets where the Company participates.
- Forge long-term strategic alliances with suppliers.

## IV. HANDBOOK OBJECTIVES

The promulgation of Chilean Law N°20.393, generates that Compañía Agropecuaria Copeval S.A. and its subsidiaries increase their regulation and control policies to those already existing, therefore, the Company requires from all its members, since the highest functional hierarchies, to all employees to avoid any situation that generates conflict between their personal interests and the ones of the Company.

## V. APPLICATION OF THE CRIME PREVENTION HANDBOOK

The rules contained in this Handbook apply to each and every member of the Company (Copeval S.A. and its subsidiaries), without exception, whether employees, executives, managers or directors. It is also expected that those who are related to the Company, faithfully comply with the rules contained in this document.

For the purposes of this Handbook, whenever it states "Compañía Agropecuaria Copeval S.A." and/or "Copeval S.A.", refers to Copeval S.A. and its subsidiaries.

## VI. BASIC TERMINOLOGY

For a better understanding of what is regulated, an interpretation of the main terms used is made:

**ILLEGAL ASSET:** Is that that comes from any criminal activity, such as terrorism, drug trafficking, corruption, kidnapping, extortion, contraband, illicit arms trafficking, explosives, ammunition or material destined for their production, illicit trafficking of organs, tissues and drugs, illicit trafficking in persons, pimping, illicit trafficking in nuclear substances, works of art, animals or toxic materials and fraud.

**CLIENT:** Any natural or legal person with whom a contractual relationship is established and / or maintained for the provision of any service and / or supply of any product specific to its activity.

**MONEY LAUNDERING:** It is a crime purely and exclusively related to organized crime. It is that operation through which money from drug trafficking, public corruption, or organized crime, is invested, hidden, replaced or transformed and restored to the legal economic-financial circuits, being incorporated to which - Any type of business as if it had been obtained lawfully. In itself, it is the process by which it seeks to hide the illicit origin of some goods and take advantage of the proceeds from criminal activities, to convert them into others that appear to be lawful and ultimately are not. Blanking is also the concealment of the origin of the funds, their concealment and the help of the authors of the aforementioned criminal activities.

**FINANCING OF TERRORISM:** It is the financing that it is offered in any way to terrorism or to any organization that commits or involves terrorism. The definition most widely accepted by the international community is that of the International Convention for the Suppression of the Financing of Terrorism (1999): "... Any other act intended to cause death or serious bodily injury to a civilian or any other person who do not participate directly in hostilities in a situation of armed conflict, when, the purpose of such act, by its nature or context, is to intimidate a population or force a government or an international organization to perform an act or abstain from doing so. "

There is a great variety of activities that contribute to the economic maintenance of terrorism: the most profitable is drug trafficking, but other equally profitable ones are human trafficking, counterfeit products, kidnappings and extortion.

**BRIBERY:** It is a crime that consists of an authority or public official accepting or requesting a gift in exchange for performing or omitting an act.

The Bribery is simple if the public official accepts a remuneration to comply with an act due to his function or qualified if he receives a gift to hinder the fulfillment of an act or not to carry it out, whether that act is constitutive or not. of crime. This kind of felony can be performed to a non-public official

**UNUSUAL OPERATION:** Transactions that deviate from the operations that the client usually performs and do not respond to the type of business or activity that he or she develops or at the level of income. They are also unusual, those of uncommon complexity or without evident economic or legal justification.

**COVERING:** Concealment of the perpetrator or accomplice of a crime or of the elements of the crime, to hide them momentarily at the service of the criminals or to profit directly with them.

**RECEIVING:** Those who know their origin or should know, have in their possession, in any capacity stolen, stolen, or objects of cattle rustling, reception or misappropriation, transport, buy, sell, transform or commercialize in any way, even if I had already disposed of them.

**CONFIDENTIAL INFORMATION:** It is information that is not public knowledge or that is not yet. It includes trade secrets, business plans, marketing and services, consumer points of view, databases, records, salary information and any other financial or other information not published.

**INCOMPATIBLE NEGOTIATION:** It is a crime of danger (does not require a result) consisting of being interested in any, negotiation, action, contract or operations by public officials, liquidators, administrators, in which they take interest because of their position or functions. It is a hypothesis of a serious conflict of interest.

**CORRUPTION BETWEEN PARTICULARS:** It punishes the employee or agent who requests or accepts to receive an economic benefit or of another nature, for himself or a third party, to favor or for having favored in the exercise of his tasks the contracting with one offerer over another.

As a counterpart, punish the one who gives, offers or consents to give an employee or agent an economic benefit or of another nature, for himself or a third party, to favor or have favored the contracting with one of the bidders over another.

**IMPROPER APPROPRIATION:** Appropriation of monies, effects or movable property, by virtue of a legally valid contract, which requires its restitution causing damage.

**UNFAIR ADMINISTRATION:** Who is sanctioned, having any title in his charge the management of the assets of a third party, natural person or society, causes him some economic damage. This is when the administrator has exercised abusively powers to dispose or obligate, or to execute or omit any behavior clearly contrary to the corporate interest or its principal.

**INTRODUCTION OF POLLUTING AGENTS:** To introduce into the sea, river, lakes or body of water, chemical, biological or physical agents that cause damage to resources.

Other felonies which are not applicable to the Company but listed in the law are:

**USE OF VIRTED HYDROBIOLOGICAL RESOURCES:** Processing, support, transformation, transportation, commercialization and storage of hydrobiological resources, as well as the elaboration, commercialization and storage of products derived from them.

**IMPROPER APPROPRIATION OF BENTHIC RESOURCES:** The one that carries out extractive activities in areas of management and exploitation of benthic resources, without being the owner of the rights.

**RECEPTION OF HYDROBIOLOGICAL RESOURCES:** Penalizes those who process, process or store hydrobiological resources or products derived from them, for which they do not prove their legal origin, and which applies to resources in a state of collapsed or overexploited.

**COMMITTEE ON ETHICS AND BUSINESS CONDUCT:** Instance that, at the request of the Prevention Officer, will meet when they deem it convenient, to analyze the cases of complaints or to contribute and develop new procedures to be modified or included in the current internal regulations.

## VII. PREVENTION MODEL

In order to design and implement an appropriate crime prevention system for the company to comply with the requirements of Chilean Law N°20.393, the following process was carried out:

- 1) Identification of the risks related to the crimes established in Chilean Law N° 20.393, in the various processes that performs the company, through the construction of the company's risk matrix by those in charge or responsible for the different processes. The existence of this type of risk arose in all processes, activities and transactions.
- 2) Review of the level of adequacy of the controls established, in relation to the level of exposure (risks), in order to identify any deficiencies or diagnosis of the current resources of the organization (Codes of conduct, complaints system anonymous, risk assessment, etc.).
- 3) Crime prevention system. The crime prevention system established in the company, comprises the following elements:
  - a. Definition of a "Crime Prevention Officer" in the Company, autonomous from the administration of the company and with sufficient power, to have the possibility of knowing and handling any case of occurrence of the offenses defined in the law: Financing of terrorism, money laundering, bribery, refusal, incompatible negotiation, corruption among individuals, misappropriation, unfair administration, introduction of polluting

agents, use of forbidden hydrobiological resources, misappropriation of benthic resources and reception of hydrobiological resources. This position will be assumed by the Head of Internal Audit Manager, currently Mr. Ricardo Maruri Herrera.

- b. The company must deliver resources and necessary material resources to the assigned "Crime Prevention Officer" in order to perform its functions.
- c. Establish a committee on business conduct and ethics: formed by the General Manager, Deputy Human Resources Manager, Tax Attorney and Crime Prevention Officer.

General Manager

Ricardo Maruri H. - Crime Prevention Officer –  
Chilean Law 20.393  
Email: ricardo.maruri@copeval.cl - Ext: 0384.

Carlos Solar B. - Deputy Manager of Human  
Resources  
Email: carlos.solar@copeval.cl - Ext: 0563.

Jaime Cortés R. – Legal advisor.  
Email: jaime.cortes@copeval.cl - Ext: 0323.

- d. Development of a Code of Ethics and Business Conduct that guides the actions of the personnel in relation to the fulfillment of Chilean Law N°20.393. It includes policies, procedures and internal administrative sanctions for non-compliance.
- e. Establishment of a behavior policy, which guides the actions of the collaborators towards compliance with Chilean Law N°20.393.



f. Establishment of procedures in areas related to the prevention of offenses established in Chilean Law N°20.393:

1. Due Diligence with respect to customers. Procedure: "RELATIONSHIP OF EMPLOYEES WITH CUSTOMERS OF THE COMPANY".

Copeval S.A. will make an effort to select its customers and identify them properly according to the procedures defined in the company to carry out this activity.

2. Due Diligence with respect to employees. "RELATIONSHIP WITH PERSONNEL IN MATTERS OF THE CRIME PREVENTION HANDBOOK".

The evaluation of the personnel of the Company must be taken into consideration from the process of selection and subsequent entry into the company; Their conduct must be analyzed and they must have a high moral quality, especially those who are going to hold positions related to customer service, receiving money and controlling information.

The objective is to have full knowledge of the following aspects of each person who maintains labor relations with the company:

- Personal history
- Labor background
- Historical background
- Social behavior
- Professional performance

3. Due Diligence with respect to the administration of complaint mechanisms and follow-up thereof. Procedure: "SYSTEM OF COMPLAINTS LAW 20.393".

To report and report faults or breaches of the Code of Conduct, the following can be used by means of: e-mail, a letter, a phone call, or through the Complaint Form on the web page.

4. Due Diligence with respect to the market. "RELATIONSHIP WITH NATIONAL AND FOREIGN PUBLIC ORGANIZATIONS.

Under no circumstances are corruption or bribery practices permitted. No collaborator is allowed to make and / or receive out-of-state payments or bribes with entities, persons or public or governmental authorities to ensure any concession, contract, approval or advantages for the benefit of the company or the organization.

5. Due Diligence with respect to the detection of suspicious transactions. Procedure: "CONTROL OF OPERATIONS".

The company should establish general criteria for analyzing the operations carried out by customers with the company, in accordance with current legal provisions, in order to determine the consistency of the same with the client's activity.

6. Due Diligence with regard to the negotiation of suppliers. Procedure: "RELATIONSHIP WITH PROVIDERS".

No collaborator can use discounts or special deals with company suppliers for their benefit or that of third parties, as a consequence of their participation in the decision process of purchasing goods, supplies, raw

materials and / or services; or for having favored or recommended the purchase of the same.

Additionally, the company prohibits the conduct of commercial transactions with suppliers that operate outside the law or of doubtful and strange reputations, especially if they fail to comply with Chilean Law N°20.393 and their offenses.

In order to implement a model of organization, administration and adequate supervision to prevent and punish the occurrence of crimes and committed as it is, to comply with and demand compliance with laws, regulations, regulations and other regulations, especially in Chilean Law N°20.393, our Company has created the present "Crime Prevention Handbook" that is detailed as follows:

#### OFFENSES SANCTIONED BY LAW 20.393

Our Company prohibits, punishes and expressly condemns the following crimes:

i. Money laundering (Art. 27 of Chilean Law N°. 19.913), which refers to the process used to conceal or disguise the existence, illegal source, movement, destiny or illegal use of assets or funds resulting from activities. illegal to make them look legitimate. This illegal activity refers to the concealment of the commission of any of the following crimes:

- Drug Trafficking, contemplated in Chilean Law N°19.366,
- Terrorist behavior, contemplated in Chilean Law N°18.314,
- Fire guns Control, contemplated in Chilean Law N°17.798,

- Infringement of the regulations established in Title XI of Chilean Law N°18.045 of the Securities Market and by the General Banking Law (DFL No. 3 of 1997),
- Crimes Committed by Public Employees specifically, prevarication, misappropriation of public funds, tax fraud, bribery to national and foreign public officials, regulated in paragraphs 4, 5, 6, 9 and 9 bis of Title V of Book II of the Penal Code,
- Kidnapping, child abduction, sexual abuse committed against children under 18 years of age, production of pornographic material with minors under 18 years of age, promotion of child prostitution, trafficking of persons for prostitution regulated in articles 141, 142, 366 quater, 367 and 367 bis of the Chilean Criminal Code.

- ii. Financing of terrorism, contemplated in Article 8 of Chilean Law N°18.314, which determines terrorist conduct, with respect to which, directly or indirectly, it solicits, collects or provides funds for the purpose of their use in the commission of any of terrorist crimes.
- iii. Bribery offenses to a national and foreign public official, that is, giving or agreeing to a prize or payment to a public official for doing or not doing an act proper to his or her position. Art. 250 and 251 bis of the Criminal Code.
- iv. Reception, the one that knowing its origin cannot help but know it, has in its power, in any capacity species stolen, stolen, or objects of cattle rustling, reception or improper appropriation, transport, buy, sell , transform or commercialize in any way, even if I have already disposed of them (Amendment Chilean Law N°20.931).

- v. Incompatible negotiation: The incompatible negotiation is a crime of danger (does not require a result) consisting of being interested in any, negotiation, action, contract or operations by public officials, liquidators, administrators, in which they take interest because of their position or functions. It is a hypothesis of a serious conflict of interest.
- vi. Corruption between particulars: It punishes the employee or agent who requests or accepts to receive an economic benefit or of another nature, for himself or a third party, to favor or for having favored in the exercise of his tasks the contracting with one offerer over another. As a counterpart, punish the one who gives, offers or consents to give an employee or agent an economic benefit or of another nature, for himself or a third party, to favor or have favored the contracting with one of the bidders over another.
- vii. Improper appropriation: Appropriation of monies, effects or movable property, by virtue of a legally valid contract, which requires its restitution causing damage.
- viii. Unfair administration: Who is sanctioned, having any title in his charge the management of the assets of a third party, natural person or society, causes him some economic damage. This is when the administrator has exercised abusively powers to dispose or obligate, or to execute or omit any behavior clearly contrary to the corporate interest or its principal.
- ix. Introduction of polluting agents: have introduced into the sea, river, lakes or body of water, chemical, biological or physical agents that cause damage to resources.
- x. Use of forbidden Hydrobiological resources: Processing, stocking, processing, transportation, marketing and storage of hydrobiological resources, as well as the elaboration, commercialization and storage of products derived from them, will be sanctioned with minor prison in its minimum to medium grades, without prejudice to the corresponding administrative sanctions.
- xi. Improper appropriation of benthic resources: The one that carries out extractive activities in areas of management and exploitation of benthic resources, without being the owner of the rights.
- xii. Reception of hydrobiological resources: Penalizes those who process, process or store hydrobiological resources or products derived from them, for which they do not prove their legal origin, and which correspond to resources in a state of collapsed or overexploited.

## VIII. INTERPRETATION AND CONSULTATIONS

It is the responsibility of the Crime Prevention Officer, the interpretation of the "Crime Prevention Handbook", related to the current regulations that sanction legal persons in the crimes of Money Laundering, Financing to Terrorism, Bribery, Reception, Incompatible Negotiation, Corruption among Individuals, Unlawful Appropriation, Unfair Administration, Introduction of Pollutants, Use of forbidden Hydrobiological Resources, Improper Appropriation of Benthic Resources and Reception of Hydrobiological Resources. In the same way, it will be the responsibility of the Crime Prevention Officer to update said standards, who will process them before the relevant levels and to the Company's Board of Directors.

Due to the foregoing, any consultation or communication on the concepts regulated in this document will be processed before the person in charge of Prevention of the Company, in this case the responsibility falls on the Head of Internal Audit Manager, Mr. Ricardo Maruri Herrera.

## IX. CODE OF CONDUCT IN RELATION WITH PREVENTION OF CRIME IN COPEVAL S.A.

1) Compañía Agropecuaria Copeval S.A. requires all its personnel to behave in a consistent, straight, strict and alert manner, in compliance with the laws and the Crime Prevention Policy and norms, such as Bribery, Money Laundering, Terrorist

Financing, Reception and others. establish the law, and all employees must commit their strictest adherence to compliance with the law.

- 2) The Company's employees must always take care that Copeval's money or property in the celebration of acts and contracts with third parties that in no case will be used for illegal and / or constitutive purposes of crime, such as Financing of Terrorism, Asset Laundering, Bribery, Reception and others.
- 3) Employees must not offer, promise, give or consent to give a public employee, either Chilean or foreign, an economic benefit under any pretext or circumstance and by no means. The mere act of carrying out this action will be considered Bribery.
- 4) As a general rule, if you are a employee of Compañía Agropecuaria Copeval S.A. or his Subsidiaries, cannot offer or accept gifts (or business courtesies). This, with the sole exception of promotional items of negligible value, such as pencils, diaries or the like, to the extent that they remain within the usual parameters for the industry, are appropriate and never give the appearance of want to influence or compromise whoever receives them, whether this is an official of Compañía Agropecuaria Copeval SA and its Subsidiaries or one of our clients, suppliers or authorities. It is understood, therefore, that items or gifts with the COPEVAL brand are designed to be delivered to our customers and not for use by Company personnel.
- 5) The Company establishes relationships with government entities and with many State Companies. In all these cases, respect the special regulations that regulate the transactions that these organizations can celebrate with private companies and act only in those instances and following the formalities that are expressly authorized by law.
- 6) The company expressly prohibits its suppliers from carrying out, in the name or benefit of the company Compañía Agropecuaria COPEVAL SA, any kind of undue

payment to national or foreign public officials of any type of distribution or public institution, as well as pay tips or other types of gifts in cash, in kind or in intangible benefits.

- 7) The worker must ensure permanently that the workers under his charge, be colleagues, contractors, service providers and any person who is related to Compañía Agropecuaria Copeval SA, refrain from executing, in their relationship or connection with the company. Company, any illegal act, undue or contrary to the conduct established in this document.
- 8) If a Company worker wants to participate in a political campaign or occupy a public office, he or she must notify his or her chief of staff, the Prevention Officer and the Prosecutor's Office. Likewise, it must avoid conflicts of interest by abstaining from political matters involving the Company, the latter implies abstaining from participating in public demonstrations using the Company's uniform.
- 9) Working time is exclusive for these purposes, so using the Company's resources for political purposes is not allowed, therefore, it is requested to use free time for particular purposes in which you have an interest. the Company does not expect you to allocate part of your day for purposes not related to the position you hold.
- 10) Information to anyone outside the Company, including family and friends, except when required for commercial purposes. Even in that case, take the appropriate steps, for example, the conclusion of a confidentiality agreement to avoid the misuse of information.
- 11) Do not reveal Confidential Information to others within the Company unless you have a business reason to know it. Employees are obliged to protect the Confidential Information of the

Company at all times, both outside the workplace and during working hours, and even after the employment relationship has ended.

- 12) Under no circumstance or instruction, the worker will be authorized to commit any of the misconduct or crimes indicated above, or any other, even under the pretext that he is complying with superior instructions or that the result of the crime, allegedly, would benefit the worker. Company.
- 13) The Company will perform investigations (directed by the crime prevention officer) of the personnel to control compliance with these policies. Failure to comply will empower you to apply sanctions to the worker who has transgressed these rules.
- 14) The worker must immediately inform the employer of any situation that he or she becomes aware of, and that could result in the illegal use of money, assets or acts and contracts of the employer.
- 15) Whoever makes a complaint will enjoy the organization's support, in the sense of keeping their identity reserved when requested.

## X. PROCEDURES

In order to prevent these crimes in Copeval S.A., together with this document, procedures are created that regulate the development of the activities that are usually carried out by workers, these procedures that complement the work of this Handbook are:

- Relationship of employees with Company customers.
- Relationship with personnel regarding the Handbook on Crime Prevention.
- Complaints System Law 20,393
- Relations with National and Foreign Public Organizations
- Operations Control
- Relationship with Suppliers

Such procedures named above will be present on the intranet together with the "Crime Prevention Handbook".

Additionally, administrative and auditing procedures will be created for financial resources that will allow the company to prevent its use in the crimes typified by Chilean Law N°20.393.

The company is committed to maintaining clear and categorical accounting policies that prohibit double counting or improper identification of transactions. In addition, the company is committed to monitoring that its account statements do not have ambiguous or deceptive accounting entries that may signify illegal payments in the name of the company.

In order to establish a private and confidential communication channel, e-mail [denuncias@copeval.cl](mailto:denuncias@copeval.cl) was enabled, P.O.Box N°144 in Correos Chile de San Fernando, telephone (72) 2410384 and web page [www.copeval.cl](http://www.copeval.cl), through the Complaints Form in the Handbook and Model of Crime Prevention where complaints are received in

the detection of irregularities related to the offenses established in Chilean Law N°20.393, which refer to Bribery, Money Laundering, Financing Terrorism, Reception, Incompatible Negotiation, Corruption among Individuals, Unlawful Appropriation, Unfair Administration, Introduction of Contaminant Agents, Use of Forbidden Hydrobiological Resources Forbidden, Misappropriation of Benthic Resources and Reception of Hydrobiological Resources. In addition, employees may make complaints regarding practices considered questionable, from the ethical, moral and legal point of view by any officer of the Company.

In order to carry out the investigation and apply the corresponding sanctions, the denunciations must include all the antecedents that are provided as a basis for them, these must be formulated with seriousness and responsibility. This communication can be identified or anonymous.

For the complaints that refer to the crimes of money laundering, financing of terrorism, bribery of national or foreign public officials, reception, Incompatible Negotiation, Corruption among Individuals, Unlawful Appropriation, Unfair Administration, Introduction of Polluting Agents, Use of Forbidden Hydrobiological Resources, Misappropriation of Benthic Resource and Reception of Hydrobiological Resource referred to in Chilean Law N°20.393, on the Criminal Liability of Legal Entities, the Conduct Committee will meet, monthly or as deemed necessary by the Crime Prevention Officer, where the complaints and solutions adopted will be analyzed.



## XI. SANCTIONS

Each one of the conducts carried out in contravention of this Regulation will be subject to the corresponding disciplinary sanctions, that is, verbal reprimand, written reprimand, fine, suspension of work without pay, termination of the work contract of the Collaborator or Employees. involved and in the most serious cases the adoption of civil and criminal actions.

## XII. REVIEW OF THE CRIME PREVENTION SYSTEM

### 1. Identity and position of the Head of Crime Prevention Officer, functions and responsibilities.

In accordance with the provisions of article 4 of Chilean Law N°20.393, the highest administrative authority of the legal entity, be it its board of directors, a managing partner, a manager, a principal executive, an administrator, a liquidator, its representatives, its owners or partners, as appropriate to the form of administration of the respective entity, hereinafter the "Administration of the Legal Person", shall designate a person in charge of prevention, who shall hold office for up to three years, who may be extended for periods of equal duration.

Among the main functions of the Crime Prevention Manager are:

- a) Verify the adequate application of the specific procedures designed by the company to prevent and detect illicit operations.
- b) Report to higher instances, the possible failures that compromise the responsibility of Company personnel.

- c) Act as a valid interlocutor before the competent authorities, collaborating and contacting them.
- d) Be updated and keep the rest of the company informed about the internal rules, applicable laws and regulations in force, international agreements signed by the country and all the relevant information about prevention against money laundering, financing of terrorism, bribery of national or foreign public employees, reception, Incompatible Negotiation, Corruption among Individuals, Unlawful Appropriation, Unfair Administration, Introduction of Polluting Agents, Use of forbidden Hydrobiological Resources, Misappropriation of Bentic Resources and Reception of Remedy Hydrobiological
- e) Inform the company's management levels of its actions in this area and propose adequate control systems.
- f) Monitor the compliance of disclosure programs as well as the information of the company personnel in this matter, including recently incorporated personnel.
- g) Serve as a source of information in consultations related to the prevention of money laundering, the financing of terrorism and bribery to national or foreign public employees and compliance with laws that regulate
- h) Receive the communication reports of suspicious operations sent by the branches or units.
- i) In case of identifying suspicious transactions, report to the corresponding higher levels for decision making.
- j) Take note of the lists or forms of "excepted" customers that are subject to the commercial sector or other units, as well as the communications that are made about them.
- k) Issue a semi-annual report, during the months of June and December, on the situation of the prevention system and its compliance.

## 2. Annual Report of the Crime Prevention Officer

The Crime Prevention Officer, in coordination with the management levels of each entity, must prepare, in December, a detailed annual report on all the activities carried out by the company for the prevention of crimes, such as:

- Staff training.
- Communications received on unusual / suspicious operations.
- Complaints made by the company, among others.

## 3. Internal Control and External Audit Reports

**3.1 Internal Audit:** The design and application of the money laundering prevention system, the financing of terrorism, bribery of national or foreign public employees, reception, Incompatible Negotiation, Corruption among Private Parties, Undue Ownership, Unfair Administration, Introduction of Pollutants, Use of forbidden Hydrobiological Resources, Misappropriation of Benthic Resources and Reception of Hydrobiological Resources is the responsibility of the company and must be evaluated by the Head of Internal Audit.

In this regard, the Head of Internal Audit will consider in its annual work plans examinations aimed at evaluating and giving recommendations aimed at improving the internal control system for the prevention of money laundering, the financing of terrorism, bribery of national or foreign public employees, reception, Incompatible Negotiation, Corruption between Private Parties, Unlawful Appropriation, Unfair Administration, Introduction of Polluting Agents, Use of forbidden Hydrobiological Resources, Misappropriation of Benthic Resources and Reception of Hydrobiological Resources.

**3.2 External Audit.** The external auditors will include in their annual report what refers to the evaluation of the crime prevention system implemented by the company.

## 4. Means of contact available:

Crime Prevention Officer, Ricardo Maruri H.  
Email: [ricardo.maruri@copeval.cl](mailto:ricardo.maruri@copeval.cl) - ext: 0384.

P.O.Box N°. 144, San Fernando - Correos Chile  
Email: [denuncias@copeval.cl](mailto:denuncias@copeval.cl).

Complaint Form website [www.copeval.cl](http://www.copeval.cl)  
Telephone (72) 2410384



