

COPEC S.A.
CRIME PREVENTION POLICY (LAW No. 20,393)



COPEC

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1. OBJECTIVE

The purpose of this document is to establish clear guidelines to prevent conduct that constitutes a violation of Article 1 of Law No. 20,393 or any other applicable industry regulations from arising in connection with the operations of Copec S.A. (hereinafter "Copec" or the "Company"). This Policy is an essential part of the Crime Prevention Model (hereinafter "Prevention Model" or "CPM") in accordance with the provisions of Law No. 20,393 on Criminal Liability of Legal Entities, which in turn is part of Copec's Ethics and Compliance System.

2. SCOPE

The scope of this Policy covers the entire Company, i.e., its controllers, directors, executives, representatives, senior management, employees, contractors, advisors to the Company, and, in general, all service providers who manage matters specific to the Company when dealing with third parties, with or without representation.

3. DEFINITIONS

- **Crime Prevention Model:** Set of rules, policies, and procedures for organization, administration, control, and supervision established by the Company to prevent its comptrollers, directors, executives, representatives, Senior Management, Employees, contractors, and all service providers who manage company matters with third parties from committing the crimes referred to in Article 1 of the aforementioned Law, as well as other types of conduct contrary to the Company's ethical standards.
- **Code of Ethics:** A binding document that sets forth Copec's corporate values and serves as a guideline for every Employee, regardless of their hierarchical position, promoting conduct based on ethics.
- **Senior Management:** Comprised of the Chief Executive Officer and the Company's executive staff.
- **Employee:** Any person who has an employment contract under subordination and dependence with the Company, including members of the Board of Directors.
- **Third Parties:** Any person or company that is not an employee or Director of the Company, generally those who provide or offer some type of professional or support services to the Company, whether for a fee, as contractors, and/or as advisors to the Company.
- **Crime Prevention Officer:** the person in charge of managing the Crime Prevention Model, i.e., its design, implementation, updating, monitoring, control, and periodic evaluation by independent third parties. The Ethics and Corporate Compliance Officer has been appointed by the Board of Directors to fill this role.
- **Ethics Reporting Channel:** a system developed by Copec for receiving and investigating complaints in order to gather information relevant to the company, such as reports of illegal acts or conduct, including the commission of any of the crimes established in Law No. 20,393, Decree Law No. 211, or any other action, fact, or conduct that is contrary to law or that contravenes the Company's internal rules or its Code of Ethics.



4. PRINCIPLES AND GUIDELINES OF THE PREVENTION POLICY

a. Acting Ethically and Responsibly.

Copec remains committed to acting ethically and responsibly, and to conducting all its operations in accordance with its Code of Ethics, Compliance Policy, industry rules and regulations, and the standards established by the Company.

To this end, Copec maintains an organizational, administrative, and supervisory system for the prevention of crimes, in accordance with the provisions of Law No. 20,393, known as "Copec S.A. Crime Prevention Model."

b. Prevention.

Through this system of organization, administration, control, and supervision (CPM), Copec places special emphasis on preventing the crimes established in Article 1 of Law No. 20,393. To this end, it identifies those processes developed by the Company, within the scope of its activities, that are exposed to these criminal risks and any other crimes, as well as any improper conduct that is classified as such.

c. Damage control and repair.

If a violation is detected, Copec will take the appropriate disciplinary measures¹ and adopt the necessary action plans to prevent such conduct from recurring.

d. Corporate commitment.

Senior Management and the Company's Prevention Officer shall be jointly responsible for the implementation, administration, updating, and supervision of the Prevention Model.

The Prevention Model shall be updated when legal changes or relevant changes in business conditions occur, an activity for which the Prevention Officer shall be responsible together with Senior Management.

The Prevention Model will be periodically assessed by independent third parties and mechanisms for improvement or updating will be generated based on such assessments, in accordance with the provisions of Article 4, paragraph 4 of Law No. 20,393.

¹In accordance with the Ethics Committee's Defining Measures Procedure.



5. ROLES AND RESPONSIBILITIES

5.1 Board of Directors

- a. Approve all policies that are part of the Crime Prevention Model.
- b. Ensure the correct implementation and effective operation of the Prevention Model.
- c. Provide the Prevention Officer with the necessary resources and material and immaterial means to carry out his or her duties properly, as well as effective powers of management and supervision for the performance of the activities specific to his or her position². Likewise, the Crime Prevention Officer must be given adequate independence to carry out his or her duties.
- d. Appoint and/or dismiss the Prevention Officer from their position.
- e. Take the necessary measures to prevent crimes when requested by the Prevention Officer in order to fulfill his or her duties and when these measures exceed his or her competence.
- f. Receive and evaluate the management and operating reports of the Prevention Model generated by the Prevention Officer at least every six months.
- g. Receive and approve the Prevention Officer's Work Plan and budget on an annual basis.

5.2 Chief Executive Office

- a. Support the Prevention Officer, ensuring his or her unrestricted access to information and persons, as well as coordinating the activities specific to the Prevention Model in the areas where required.
- b. Contribute to and promote the dissemination of the Prevention Model throughout the organization, creating the necessary channels for dissemination and commitment, with the aim of achieving effective communication of policies and procedures, as well as setting an example of compliance with this Policy.
- c. Inform the Prevention Officer of any situation observed that relates to non-compliance with Law No. 20,393 and the procedures related to the Prevention Model.

²Article 4, paragraph 2, *ibid*.



5.3 Subject or Person Responsible for Crime Prevention

- a. Exercise the role in accordance with the powers defined for the position by the Company's Board of Directors, as established by Law No. 20,393³.
- b. Identify, together with the Company's Senior Management, the Company's activities or processes, whether regular or sporadic, in the context of which the risk of committing the crimes established in Law No. 20,393 is generated or increased.
- c. Establish protocols and procedures to prevent and detect criminal conduct in the context of the Company's activities.
- d. Define the resources and material and immaterial means necessary for the fulfillment of its duties, in accordance with the Company's general guidelines on the matter, requesting approval from the Board of Directors.
- e. Report to the Board of Directors on its management and the functioning of the Prevention Model, as well as the measures and plans implemented in fulfillment of his or her duties, every six months and/or when circumstances warrant.
- f. Manage the Company's Ethics Reporting Channel in accordance with the procedures of the Ethics Reporting Channel, Complaints Management Procedure, Investigation Procedure, and Ethics Committee's Measures Definition Procedure. Report to the Ethics Committee on the findings of the investigation, its conclusions, and proposed sanctions.
- g. Continuously evaluate the effectiveness and validity of the Prevention Model adopted and its compliance with laws and other regulations, reporting to the Board of Directors on the need and advisability of modifying it. Submit any updates to the Crime Prevention Model to the Board of Directors for approval.
- h. Acknowledge and analyze all unusual or suspicious operations and, if deemed necessary, refer the case to the Ethics Committee and/or the Board of Directors, as appropriate. For the purposes of analysis, the Prevention Officer shall gather all documentation related to the operation, creating a background file for such purposes.
- i. Intervene, when appropriate, in any lawsuits, complaints, or legal proceedings that the Company decides to undertake in relation to the crimes indicated in Law No. 20,393, and, when appropriate, provide any information in its possession or of which it has knowledge due to his or her position, in accordance with the guidelines of the Legal Department.
- j. The Prevention Officer will have access to all information related to his or her area of responsibility within the Company.

³Article 4°, paragraph 3, Law N° 20,393



5.4 Management

- a. Design, implement, and execute preventive and detective controls established in the CPM's risk and control matrix.
- b. Report to the Prevention Officer any failure or lack of implementation of one or more controls that mitigate any of the risks of the processes under their responsibility. Develop an action plan, in coordination with the Prevention Officer, that includes deadlines, responsible parties, and specific measures to correct the deficiencies identified, ensure compliance with established controls, and minimize the likelihood of future occurrence of the risk.

5.5 Areas Supporting the Prevention Model

The areas that support the Prevention Model are as follows:

- Legal Management
- Human Resources Management
- Administration and Finance Management
- Comptroller
- Ethics Committee
- Audit and Risk Committee

The objective of the support areas is to provide support to the Prevention Manager in the prevention, detection, response, supervision, and monitoring activities that comprise the CPM.

The activities to be carried out by the support areas are as follows:

- a. **Legal Management:** Advise the Prevention Officer on all legal and contractual matters relating to the Prevention Model and Law No. 20,393 and, through the Ethics and Compliance Officer, provide support in the creation, implementation, execution, and/or supervision of the controls established in the Prevention Model. Additionally, manage the inclusion of clauses for compliance with Law No. 20,393 in the different contracts entered into by Copec with third parties.

Provide the support and information required by the Prevention Officer for the performance of his or her duties in relation to the implementation, operation, and effectiveness of the CPM.

- b. **Human Resources Management:** Include topics from the Prevention Model and associated crimes in the Company's staff Training and Development programs as mandatory content, as well as in the dissemination and awareness activities carried out by the Culture and Experience Department.

In general, support the coordination and implementation of dissemination and training activities required by the Prevention Officer.

Ensure that each new employee completes the Declaration of Relationships in advance, a document that must be updated whenever the content of said declaration is modified.



- c. **Administration and Finance Management:** Ensure that each new contractor, supplier of goods and/or services (including lessees and dealers) completes the Declaration of Relationships in advance, a document that must be updated whenever the content of said declaration is modified.

Verify, in advance, the background information of new contractors, suppliers of goods and/or services (including workers, lessees, and dealers) through the consultation system contracted by the Company, in order to detect whether they appear in databases of public officers (PO) or municipal officers (MO), PEP or persons associated with any of the crimes covered by Law No. 20,393, validating, where applicable, the Declaration of Relationships submitted.

- d. **Ethics Committee:** To advise Management on matters of ethics and conduct, ensure the proper application and dissemination of Copec's Code of Ethics, and suggest to Management any disciplinary measures it deems appropriate when a violation has been proven.

- e. **Comptroller's Office:** Coordinate with the Ethics and Compliance Officer the incorporation into the Annual Audit Plan of reviews of certain controls of Copec's Prevention Model, in order to monitor their proper implementation.

Assist, together with the Prevention Officer, the areas responsible for drawing up and implementing improvement plans for deficiencies or vulnerabilities detected in the CPM compliance audits.

- f. **Audit and Risk Committee:** Oversee the formalization and implementation of a risk management methodology and promote it within the company, ensuring that the different area managers adhere to the Risk Management Framework and Risk Strategy.

6. OBLIGATIONS, PROHIBITIONS, AND SANCTIONS

a. **Obligations:**

- Take all necessary measures to ensure that the employee does not engage in any Prohibited Conduct or Prohibitions related to the crimes established in Law No. 20,393.
- Report through the Ethics Reporting Channel available on the website and the Somos Copec intranet and/or directly to the Prevention Officer at prevenciondedelitos@copec.cl any violation of the laws or any conduct and/or act that could be classified as one of the crimes established in Law No. 20,393.
- Cooperate in good faith with any internal audit or investigation conducted by the Prevention Officer, providing all information in their possession.
- Comply with and adopt the controls established in the processes in which they participate, in order to mitigate the risks of committing any of the crimes established in Law No. 20,393.



- Attend training sessions on the Crime Prevention Model scheduled by the Company. In addition, they must fully complete the assigned e-learning course within the established deadlines.
- Immediately report any changes in their personal or professional circumstances that could affect their impartiality or create a conflict of interest, using the Declaration of Relationships form available on the intranet.
- Act transparently and ethically, complying with current regulations and ensuring that all interactions with public officers are in accordance with the principles established in the Procedure for Relations with Public Officers⁴.

b. Prohibitions:

- Engaging in any conduct that could be classified as Prohibited Conduct or Prohibitions, as it is linked to the crimes established in Law No. 20,393.
- Engaging in any act or conduct that involves them as a participant in the crimes established in Law No. 20,393.
- Instructing any employee or third party to commit any of the crimes covered by Law No. 20,393.

c. Sanctions:

In accordance with the provisions of Article 4, No. 3, letter d) of Law No. 20,393 on Criminal Liability of Legal Entities and the provisions of Copec's Crime Prevention Model, failure to comply with the obligations and prohibitions contained in this instrument may be punished as follows:

1. Application of disciplinary measures established in the Internal Regulations on Health and Safety.
2. Unilateral termination of the current contract(s) with Copec, and/or termination of their duties with Copec, by means of written notification to that effect. Any breach of the terms of this Policy by any of the obligated parties, including any of the Prohibited Conduct or Prohibitions linked to the crimes established in Law No. 20,393, shall always be considered a serious breach.
3. The above sanction does not exclude Copec's right to seek compensation for damages in court.

⁴<https://somos.copec.cl/content-pages/view-content/485>



7. UPDATE SHEET

Version	Date	Description of the modification	Modified by	Approved by
01	03/29/2012	First version.		Board of Directors N° 109 29/03/2012
02	09/29/2016	Addition of the crime of receiving stolen goods.	Angel Rubio	Board of Directors N° 167 09/29/16
03	10/23/2017	Update of names of Management and addition of Executive Vice President. Amendment to the wording of No. 4.1 to include future crimes.	Angel Rubio	Board of Directors N° 181 10/23/2017
04	10/02/2019	Incorporation of new crimes Laws No. 21,121 and No. 21,132	Angel Rubio	Board of Directors N° 206 10/23/2019
05	06/02/2020	Change of name of the Reporting Channel and editorial adjustment of its definition.	Angel Rubio	Angel Rubio Alejandro Palma
06	06/28/2023	Update of new crimes, company name, elimination of the executive vice presidency, and other amendments.	Lorena Piñeiro	Board of Directors N° 249 06/28/2023
07	09/25/2024	Update in accordance with the new law on economic and environmental crimes.	Lorena Piñeiro	Board of Directors N° 264 09/25/2024