

COPEC S.A.
CRIME PREVENTION MODEL (LAW N° 20,393)



COPEC

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1. INTRODUCTION

Copec S.A. (hereinafter “Copec” or the “Company”) maintains and reaffirms its deep commitment to faithfully comply with current legal regulations, ethical principles, and contractual obligations regarding all persons with whom it interacts in its daily operations.

Regulatory compliance is therefore a fundamental cornerstone of the ethical and corporate best practices adopted by the Company as a means of achieving long-term success and sustainability. This Crime Prevention Model (hereinafter “Prevention Model” or “CPM”) embodies this commitment and serves as a guide for all Employees in order to strengthen a culture of respect for the laws in force and adherence to the Company’s ethical principles and corporate values.

2. OBJECTIVE

The purpose of this document is to summarize the roadmap approved by Copec's Board of Directors to implement an adequate Crime Prevention Model in accordance with Law No. 20,393, to ensure compliance with legal obligations. Ultimately, the Company seeks to effectively implement the CPM in such a way as to prevent, discourage, and punish the commission of any of the aforementioned crimes.

3. SCOPE

In accordance with Law No. 20,393, the Prevention Model shall apply to the Company, its employees, customers, suppliers, strategic partners, contractors, and any third parties that provide services to the Company by managing its affairs with third parties.

The Company may be held criminally liable if any of the aforementioned persons commits, in the course of their activities, any of the crimes established in Article 1 of Law No. 20,393, even if such conduct does not result in any benefit.

4. BASIC ELEMENTS OF THE PREVENTION MODEL

Copec's Prevention Model is defined as a set of organizational, administrative, and supervisory rules, policies, and procedures designed to prevent the commission of crimes established in Article 1 of Law No. 20,393, which are applicable to Copec's operations.

In accordance with Article 4 of Law No. 20,393 and in accordance with the corporate purpose, line of business, size, complexity, resources, and activities carried out by the Company, Copec has deemed it reasonable to design and implement the following aspects:

a. Identification of activities or processes that involve a risk of criminal conduct.

The Company has a criminal and environmental risk matrix that identifies all risky processes, assesses the criticality of risks, and includes the respective controls and action plans to sufficiently mitigate such risks. This matrix is based on the risk appetite table approved by the Board of Directors at its meeting No. 255 on December 20, 2023.

b. Establishment of protocols and procedures to prevent and detect criminal conducts.

The Company has updated the internal regulations of the CPM¹ and other operational protocols and procedures to prevent and/or detect the commission of a crime, and has committed to formalizing those already implemented as a relevant control.

The obligation to comply with these internal regulations has been incorporated into the respective employment and service contracts of all employees, service providers, contractors, including their senior executives.

c. Communication and dissemination of CPM procedures and protocols.

All procedures, protocols, and internal regulations that are part of the CPM have been communicated to Copec employees and made available on the SOMOS intranet platform.

d. Safe reporting channels and internal sanctions for non-compliance.

Copec has established an Ethical Reporting Channel, available to receive complaints from employees on the SOMOS intranet platform (somos.copec.cl) and from third parties on the website: <https://ww2.copec.cl/nuestra-empresa/canal-de-reporte-etico>. This service is provided by an external company to guarantee confidentiality and is managed by the Ethics and Corporate Compliance Officer.

The procedure for handling complaints and conducting internal investigations is regulated in the respective procedures². Likewise, the roles and responsibilities have been defined, as well as the way in which the Ethics Committee recommends disciplinary measures or action plans.

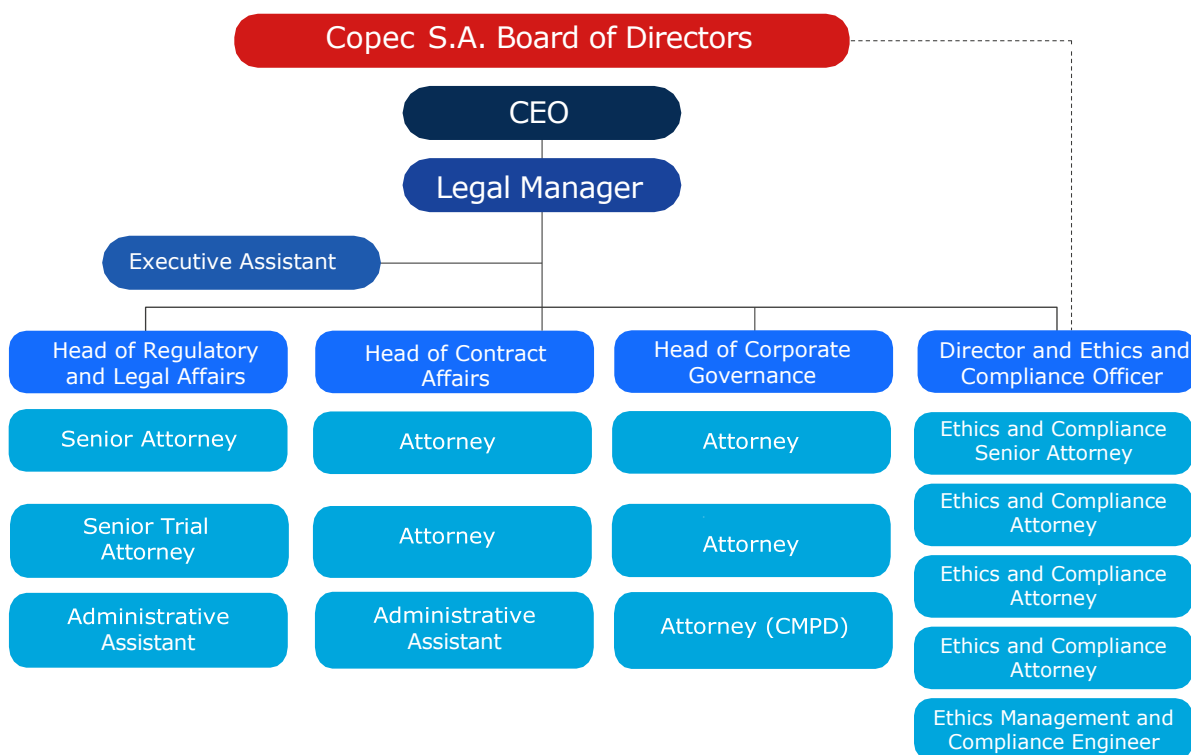
¹This policy incorporates the provisions of the Anti-Corruption Policy and the Crime Prevention Procedure and replaces them as of this date.

²Complaint management procedure and internal investigation procedure (<https://somos.copec.cl/content-pages/view-content/343>)

e. **Appointment of one or more responsible parties (Compliance Officer)**

The Board of Directors, in a duly constituted meeting, has appointed Copec S.A.'s Ethics and Corporate Compliance Officer as the person responsible or Prevention Officer, who will perform both roles simultaneously.

At the same meeting, the Board of Directors granted the Crime Prevention Officer adequate independence, effective management and supervisory powers, and direct access to the Board to report in a timely manner on the measures and plans implemented in the fulfillment of his duties, to render accounts of his performance, and to request the adoption of necessary measures that may go beyond his competence.



Likewise, the Board of Directors has expressly stated that the Prevention Officer will have the necessary resources and material means to properly perform his or her duties, as established in an annual budget.

In Minutes No. 109, the Board of Directors agreed to ensure the proper functioning of the Prevention Model, and to that end will monitor its operation through the accountability statements and semi-annual reports submitted by the Prevention Officer, without prejudice to any specific reports that the Board of Directors may request from the Prevention Officer or the Ethics Committee.

- f. Provision for periodic evaluations by independent third parties and mechanisms for improvement or updating based on such evaluations.

The Company shall periodically submit the Prevention Model to an evaluation by independent third parties in order to monitor the adequate implementation of strategic and relevant controls. If any gaps are detected as a result of such evaluations, the respective area, together with the Prevention Officer, will design an appropriate action plan.

The Prevention Officer is responsible for identifying necessary improvements to the CPM and designing an action plan for its improvement, and such modifications must always be submitted to the Board of Directors for approval.

5. STRATEGIC PILLARS

a) **Prevention Activities**

These are measures implemented by the Company with the aim of persuading individuals not to engage in conducts or omissions that constitute a breach of the obligations contained in the Prevention Model and/or the commission of the crimes indicated in Law No. 20,393.

The elements associated with prevention activities are as follows:

- i. Development, approval, and dissemination of internal standards related to the Scope of Control:
 - a. Crime Prevention Policy.
 - b. Compliance Policy.
 - c. Code of Ethics.
 - d. Ethics Committee Statute.
 - e. Ethical Reporting Channel Procedures³.
 - f. Other Policies and Procedures.
- ii. Training or coaching
 - a. Mandatory annual e-learning for the entire company
 - b. Induction training of new employees
 - c. Targeted training specific to positions or areas at risk.

³Ethical Reporting Channel Procedure, Complaint Management Procedure, Internal Investigation Procedure, and Ethics Committee's Measure Definition Procedure.

iii. Dissemination and Awareness Raising.

- a. Mailing
- b. Dissemination campaigns
- c. Keynote lectures by experts

iv. Legal and Labor Instruments, with a regulatory compliance clause referring to the obligations, prohibitions, and penalties established in the Crime Prevention Policy:

- a. Employment Contract or Addendum.
- b. Service Station Operation and Lease Contract or Addendum – Copec Dealers.
- c. General Conditions for the Procurement of Products and/or Services.
- d. Contract Addendum for Contractors, Tenants, Suppliers of Goods and/or Services.
- e. Chapter Internal Regulations on Order, Hygiene, and Safety.

v. Risk matrix, identifying the Company's processes and the risks associated with the crimes mentioned in Article 1 of Law No. 20,393.

b) Identification activities

The objective of these activities is to carry out actions that identify possible violations of the Prevention Model and/or the commission of any of the crimes indicated in Law No. 20,393.

The elements related to identification activities are as follows:

- i. Provision of a reporting channel, the "Ethics Reporting Channel," open to third parties, anonymous, and confidential.
- ii. Management of complaints received.
- iii. CPM assessment by independent third parties.
- iv. Annual Audit Plan for compliance with the Prevention Model controls.
- v. Internal investigations.
- vi. Monitoring of strategic and relevant controls
- vii. Monitoring of
 - a. Risk indicators
 - b. Performance indicators

c) Response activities

The objective of the response activities is to establish disciplinary measures and/or sanctions for those who fail to comply with the Prevention Model or when indicators of crimes under Law No. 20,393 are detected. The response activities include the review of the control activities that have been violated, in order to strengthen them or replace them with new control activities.

The response activities of the Prevention Model are as follows:

- i. Review of control activities and establishment of improvements.
- ii. Reports to the authorities (optional).
- iii. Disciplinary sanctions and action plans.
- iv. Recording and follow-up of complaints and sanctions.
- v. Action plans to strengthen controls.

5.1 Continuous Improvement

Measures adopted by Copec aimed at ensuring an adequate and effectively implemented CPM in accordance with Law No. 20,393.

The Prevention Officer shall ensure that the CPM is kept up to date in light of legislative changes, new lines of business or products that the Company decides to develop, or changes in the risk appetite levels determined by the Board of Directors, among other factors.

6. UPDATES SHEET

Version	Date	Description of the modification	Modified by	Approved by
01	07/01/2014	First version		Angel Rubio
02	09/09/2016	Addition of the crime of receiving stolen goods.	Angel Rubio	Angel Rubio
03	06/01/2017	Update: Legal and Labor Instruments; name of Human Resources Management.	Angel Rubio	Angel Rubio
04	10/23/2017	Update Chief Executive Office and Legal Management.	Angel Rubio	Angel Rubio
05	12/10/2019	Addition of new crimes, preventive documentation, and elimination of the Critical Processes section and different editorial adjustments.	Jaime Segura	Angel Rubio
06	06/02/2020	Change of name of Reporting Channel—General adjustments to letter a) and update of CPM diagram.	Angel Rubio	Angel Rubio
07	06/28/2023	Update of CPM, new crimes.	Lorena Piñeiro	Board of Directors
08	09/25/2024	Update of CPM in accordance with new Law 21,595 on economic and environmental crimes.	Lorena Piñeiro	Board of Directors