

CRIME PREVENTION POLICY

Cooke Aquaculture Chile S.A

INDEX

1. INTRODUCTION.....	3
2. OBJECTIVE	3
3. SCOPE.....	3
4. DEFINITIONS	3
5. CRIME PREVENTION MODEL GUIDELINES	9
6. CRIMINAL LIABILITY OF LEGAL PERSONS	9
7. ROLES AND RESPONSIBILITIES	11
8. CORPORATE GOVERNANCE OF COOKE CHILE S.A.....	11
9. ETHICS COMMITTEE.....	12
10. COMPLIANCE TEAM.....	12
11. AREAS OF SUPPORT FOR THE CRIME PREVENTION MODEL.....	14
12. WORKERS, CONSULTANTS, CONTRACTORS AND SUPPLIERS	14
13. APPROVAL AND UPDATE	14

1. INTRODUCTION

The Crime Prevention Policy and Procedure sets forth the applicable criteria and the framework of action for the prevention of crimes in accordance with the provisions of Law No. 20,393, which establishes the criminal liability of legal persons and its subsequent amendments contained in Laws No. 20,931, No. 21,121, No. 21,132, No. 20,507, No. 21,459 and No. 21,595, hereinafter "Law N°20.393".

2. OBJECTIVE

The purpose of this Corporate Crime Prevention Policy is to establish the guidelines on which the adoption, effective implementation and operation of the Crime Prevention Model of Cooke Chile S.A. is based. The foregoing, in accordance with the provisions of Law No. 20,393 on Criminal Liability of Legal Entities and Law No. 21,595 on economic crimes and attacks against the environment.

3. SCOPE

This policy is applicable to all employees of Cooke Chile S.A., including directors, highest administrative authorities, partners and/or shareholders, and all third parties outside the Company who may act on behalf of and in favor of the Company, hereinafter "the Collaborators".

4. DEFINITIONS

- **Cooke Chile S.A.:** Corresponds to Cooke Aquaculture Chile S.A. In this document it also corresponds to this company when the "Company" is mentioned.
- **Code of Ethics:** Guide for the members of the Board of Directors, executives and workers of Cooke Chile S.A., regardless of their hierarchical rank, which promotes conduct based on rectitude and honesty, in each of their actions.
- **Bribery:** The crime of bribery is committed:
 - A public employee who, by reason of his or her position, requests or accepts an economic or other benefit to which he or she is not entitled, for himself or for a third party. (Article 248 of the Penal Code)
 - A public employee who requests or agrees to receive greater rights than those assigned to him by reason of his position, or an economic or other benefit, for himself or a third party, to perform or for having performed an act proper to his office by reason of which he is not entitled to rights (Article 248 of the Penal Code).
 - A public employee who requests or agrees to receive an economic or other benefit for himself or a third party to omit or for having omitted an act due to his or her position, or for executing or for having performed an act in violation of the duties of his or her position (Article 248 Bis of the Penal Code)

- A public employee who requests or agrees to receive an economic or other benefit for himself or herself or for a third party to commit any of the crimes or simple offenses expressed in this Title, or in paragraph 4 of Title III, (Article 249).
- **Bribery:** The crime of bribery is committed:
 - Anyone who gives, offers or consents to give a public employee an economic or other benefit, for the benefit of the latter or a third party, due to the employee's position under the terms of the first paragraph of Article 248, or to perform the actions or incur in the omissions indicated in Article 248, second paragraph, 248 bis and 249, or for having made or incurred in them. (Definition according to the Penal Code Article 250).
 - **Bribery of Foreign Public Officials:** Anyone who, for the purpose of obtaining or maintaining for their own or for a third party any business or advantage in the context of any international transactions or an economic activity carried out abroad, offers, promises, gives or consents to give a foreign public official an economic or other benefit for the benefit of themselves or a third party, due to the official's position, or to omit or execute, or to have omitted or executed, an act proper to his office or in violation of the duties of his office, (Definition according to the Penal Code, Article 251 bis).
- **Financing of Terrorism:** Crime committed by any person who, by any means, directly or indirectly, solicits, collects or provides funds for the purpose of being used in the commission of any of the terrorist crimes, those indicated in Article 2 of Law 18,314, among others, seizing or attacking public transportation in service, attack against the Head of State and other authorities, illicit association with the aim of committing terrorist crimes. (Definition in accordance with Law No. 18,314, Article 8).
- **Money Laundering:** Crime committed by any person who, in any way, conceals or disguises the illicit origin of certain assets, knowing that they come, directly or indirectly, from an illicit act or, knowing that they originate, conceals or disguises these assets. Or anyone who acquires, possesses, has or uses the aforementioned assets, for profit, when at the time of receiving them he or she has known their illicit origin. (Article 27, Law No. 19,913).
- **Reception:** An offence committed by anyone who, knowing their origin or at least knowing their illicit origin, has in his possession, in any capacity, stolen or cattle-rustling, receiving or appropriating goods; transports, buys, sells, transforms or markets them in any form, even if he has already disposed of them (Definition in accordance with article 456 bis A of the Penal Code).
- **Corruption between individuals:** The crime of corruption between individuals is committed:
 - An employee or director, administrator or agent of a company who requests or agrees to receive an economic or other benefit, for himself or a third party, to favor or for having favored, in the exercise of his or her duties, contracting with one bidder over another (Definition in accordance with article 287 bis of the Criminal Code).
 - Anyone who gives, offers or consents to give an employee, director, administrator or agent of a company, an economic or other benefit, for himself or a third party, so that he favors or for having favored the contracting with one bidder over another (Definition in accordance with article 287 ter of the Criminal Code).

- **Unfair administration:** Anyone who, being in charge of safeguarding or managing the assets of another person, or any part of it, by virtue of the law, an order of the authority or an act or contract, causes damage to the person, either by abusively exercising powers to dispose of it on behalf of it or to oblige it, either by executing or omitting any other action in a manner manifestly contrary to the interest of the owner of the affected property (Definition according to article 470 numeral 11 of the Criminal Code).
- **Incompatible negotiations:** Anyone who is in charge of safeguarding or managing all or part of the assets or estate of another person, whether natural or legal; and directly or indirectly has a personal interest in any negotiation, action, contract, operation or management in which he or she has to intervene in relation to the assets or assets in his or her charge, commits the crime of incompatible negotiations (Definition according to Article 240 of the Criminal Code).
- **Misappropriation:** This crime is committed by anyone who, to the detriment of another, appropriates or diverts money, effects or any other movable thing that he or she has received in deposit, commission or administration, or by any other title that produces an obligation to deliver or return it (Definition in accordance with article 470 numeral 1 of the Penal Code).
- **Computer crimes:** These are criminal offenses established in Law No. 21,459, intended to punish illicit access to an information system (without requiring a certain purpose), the attack on the integrity of a computer system or to affect its normal operation, as well as the illegal interception of information and, where appropriate, the attack on their integrity.

In turn, the following are included: computer fraud, punishing those scams committed by electronic means; computer forgery by punishing anyone who improperly introduces, alters, damages or deletes computer data with the intention that they be taken as authentic or used to generate authentic documents; the "reception of computer data", which punishes anyone who commercializes, transfers or stores, in any capacity, computer data, knowing or not being able to do less than know the illicit origin, that is, from some of the crimes described in the law; and the abuse of the devices.

- **Extractive activities in areas of management and exploitation of benthic resources without being the holder of rights over that area:** This crime is committed by anyone who carries out extractive activities in areas of management and exploitation of benthic resources, without being the holder of the rights referred to in the final paragraph of article 55 B of the General Law of Fisheries and Aquaculture (LGPA). (Article 139 bis, LGPA).
- **Processing, elaboration or storage of hydrobiological resources in a collapsed or overexploited state, or derived products, without proving their legal origin:** Anyone who processes, elaborates or stores hydrobiological resources or products derived from them, with respect to which their legal origin is not accredited, and which correspond to resources in a collapsed or overexploited state, according to the annual report of SUBPESCA. (Article 139 ter, LGPA).
- **Offence of release of hydrobiological species:** Anyone who releases exotic hydrobiological species from farming centres into the environment without obtaining the prior authorization referred to in the regulations of article 87. Article 137 bis LGPA)

- **Crime of theft of species from a farming centre.** It is punishable by the penalties established in article 440 of the Criminal Code. The same penalty is also imposed on the **malicious breaking of nets and any action that causes or may cause the escape of specimens from farming centers.**
- **Reception of salmonid species.** Any person who, knowing their origin or being unable to do so but to know it, has in his possession, in any capacity, salmonid species obtained in violation of current regulations, transports, buys, sells, transforms or markets them in any form, even if he has already disposed of them. The penalty is in accordance with the provisions of article 456 bis A of the Criminal Code.
- **Crime of pollution of bodies of water:** Anyone who, without authorization, or in contravention of their conditions or in violation of the applicable regulations, introduces or orders the introduction into the sea, rivers, lakes or any other body of water, chemical, biological or physical pollutants that cause damage to hydrobiological resources, as well as anyone who does so through imprudence or mere negligence. (Article 136, LGPA).
- **Crime related to prohibited hydrobiological resources:** This crime is committed by anyone who carries out activities of processing, storing, transformation, transport, marketing or storage of prohibited hydrobiological resources, as well as the preparation, marketing and storage of products derived from those prohibited hydrobiological resources. (Article 139, LGPA).
- **Crime of carrying out certain actions in circumvention of the Environmental Impact Assessment Service (SEIA):** Article 305 of the Penal Code punishes anyone who, without having submitted his activity to an environmental impact assessment knowing that he is obliged to do so, carries out any of the following conducts: a) dumps polluting substances into maritime or continental waters; (b) extracts inland waters, whether surface or groundwater, or maritime waters; (c) discharges or deposits polluting substances on the ground or subsoil, continental or maritime; (d) dumps soil or other solids into wetlands; (e) extracts components from the soil or subsoil; and (f) releases pollutants into the air.
- **Crimes of falsehood and obstruction of the SMA:** This crime is committed by) Anyone who maliciously, in the environmental assessment of a project, presents information that conceals, mitigates, alters or diminishes the future environmental effects or impacts determined in the environmental assessment, in such a way that it could lead to an incorrect approval of the environmental qualification resolution. b) Anyone who maliciously segments their projects or activities in order to circumvent the environmental impact assessment system or to change the route of entry to it. c) Anyone who maliciously submits false or incomplete information to the Superintendence of the Environment to prove compliance with obligations imposed in an environmental qualification resolution, emission standards, remediation plans, compliance programs, prevention or decontamination plans, or any other environmental management instrument within its competence. (Article 37 Bis of the SMA Organic Law)
- **Crime of illegal extraction of water:** This crime is enshrined in article 307 of the Penal Code, punishing anyone who, having authorization to extract continental, surface or underground water, extracts it in violation of the rules of its distribution and use: 1) having established by the authority the temporary reduction of the exercise of these rights of use; or (2) in an area that has been declared a prohibition zone for new aquifer exploitation, a hydrogeological

sector restriction area has been decreed, the depletion of natural water sources has been declared in respect of it, or it has been declared a water scarcity zone.

- **Crime of trafficking in hazardous waste:** This crime is contemplated in Article 44 of Law No. 20,920 that establishes the framework regulation for waste management, extended producer responsibility and promotion of recycling; and punishes anyone who exports, imports or handles hazardous waste, prohibited or without having the respective authorizations.
- **Crimes under Law No. 18,046 on Corporations (LSA):** Law No. 18,046 on Corporations, hereinafter the "LSA", contemplates a series of punishable conducts, however, and for the purposes of this MPD, we will highlight two: a) alteration of financial records, and b) abusive agreements. With respect to the alteration of financial records, article 134 of the LSA penalizes directors, managers, administrators or main executives of a public limited company who, in the annual report, balance sheets or other documents intended for the partners, third parties or the Administration, required by law or by the applicable regulations, which must reflect the legal situation, economic and financial situation of the company, give or approve giving false information on aspects relevant to knowing the assets and the financial or legal situation of the company. Those who keep the company's accounts, or the experts, external auditors or account inspectors outside the company, who collaborate with the alteration of the indicated instruments, are also sanctioned.

On the other hand, the LSA incorporates a new article 134 bis that contains the criminal type of **abusive agreements**, which seeks to sanction even with custodial sentences those who, taking advantage of their majority position on the board of directors of a public limited company, adopt an abusive agreement, to benefit or economically benefit another, to the detriment of the other partners and without the agreement offering a benefit to the company. A controller is also sanctioned who, taking advantage of such a position, induces an abusive agreement of the board of directors.

- **Tax crimes:** In accordance with the new regulations on economic crimes, the tax crimes prescribed in the fourth paragraph of Article 8 ter; numbers 4, 5, 8, 9, 12, 13, 14, 22, 23, 24 and 25 of Article 97, and Article 100 of the Tax Code will be considered as such. Among these we find the malicious presentation of the simple affidavit to obtain authorization for the development of its line of business or activity (art. 8, section 4), maliciously incomplete or false declarations that may lead to the liquidation of lower taxes (article 97 No. 4), malicious omission of declarations (No. 5), effectively clandestine exercise of commerce or industry (No. 9), fraudulent receipt of consideration from institutions to which donations are made (No. 24), among others.
- **Crimes associated with labor obligations of misappropriation and omission in withholding contributions:** Crimes contemplated in Articles 13 and 13 bis of Law No. 17,322, on Rules for the Judicial Collection of Contributions, Contributions and Fines from Social Security Institutions. Anyone who, to the detriment of the worker or his successors, appropriates or diverts the money from the contributions that has been deducted from the worker's remuneration is punished. Likewise, the employer who, without the worker's consent, fails to withhold or pay the social security contributions of a worker or declares to the social security institutions to pay him a taxable or gross income lower than the real one, reducing the amount of the contributions that must be deducted and paid will be sanctioned.

- **Crimes contemplated in DL No. 211 of the Ministry of Economy, Development and Tourism:** These crimes are related to concealing information or providing false information to the National Economic Prosecutor's Office ("FNE"); alleging the existence of abuse between competitors knowingly or based on false or fraudulent background with the purpose of harming other economic agents; and entering into or ordering to be held, execute or organize agreements involving competitors, in order to fix prices for the sale or purchase of goods or services in one or more markets; limit their production or supply; dividing, assigning or distributing areas or market shares; or affect the result of tenders carried out by public companies, private providers of public services, or public bodies (collusive agreements).
- **Crimes against the life and health of persons:** Article 315 of the Penal Code establishes that this crime is committed by anyone who poisons or infects food, water or other beverages intended for public consumption, in terms of being able to cause death or serious damage to health, and who knowingly sells or distributes them. Anyone who makes other adulterations in such substances intended for public consumption, so that they are dangerous to health due to their harmfulness or by the appreciable impairment of their nutritional properties, and anyone who knowingly sells or distributes them.
- **Sanction:** Consequence or effect of committing an infraction associated with non-compliance with the Crime Prevention Model or any of its associated controls.
- **Crime Prevention Model (MPD):** Preventive and monitoring process, through various control activities, on the processes or activities that are exposed to the risks of committing crimes associated with Law No. 20,393, as well as other improper conduct, whose purpose is to prevent the Company's employees from being involved in any illicit activity related to the crimes typified in Law No. 20,393. in which the Company could be held liable.
- **Crime Prevention Model Compliance Team:** Internal collaborators or external managers who have been appointed by the Administration of each company to manage the Crime Prevention Model, its design, implementation, updating and control. The compliance team must have adequate independence, be endowed with effective supervisory and managerial powers and direct access to the administration to report on management and require the adoption of specific measures.
- **Administration of the Legal Entity:** The highest administrative authority of the legal entity, whether it is 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.
- **Criminal liability of legal entities:** liability attributable to the legal person for the commission of any of the crimes indicated in article 1 of Law No. 20,393, when the crime is committed in the context of the activities carried out by the Company, executed by any person who occupies a position, function or position within the Company or provides service to it by managing his or her affairs before third parties, and provided that the crime committed has been favored or facilitated by the lack of effective implementation of a Crime Prevention Model.
- **Corporate Governance:** Corporate governance is understood to be the highest administrative authority represented by the Board of Directors of Cooke Aquaculture Chile S.A.

5. CRIME PREVENTION MODEL GUIDELINES

- Cooke Chile S.A. will ensure the maintenance of an adequate organizational, administrative and supervision model for the prevention, detection and response of the crimes indicated in Article 1 of Law No. 20,393, called "Cooke Chile S.A. Crime Prevention Model", through which the prevention of the commission of the crimes indicated in its first article will be promoted. In consideration of the above, it is **expressly prohibited** for the directors, managers, executives and collaborators of Cooke Chile S.A., as well as third parties that are linked to it (contractors, advisors, agents, clients, among others) to carry out any act that may constitute a crime or any conduct that may give rise to the criminal accusation of the Company.
- The application and supervision of the rules established by the Crime Prevention Model of Cooke Chile S.A. will be in charge of a "Compliance Team", which will be appointed by the Corporate Government of Cooke Chile S.A., for a period that may not exceed three years, renewable for periods of equal duration. The Compliance Team will be led by a "Compliance Officer", who will coordinate the activities to be carried out and will report to the Regional General Manager for LATAM on the management of the Team.
- The Regional General Manager for LATAM, the Ethics Committee and the Compliance Team will be jointly responsible for the adoption, implementation, administration, updating and supervision of the Crime Prevention Model.
- The Regional General Manager for LATAM of Cooke Chile S.A. will provide and/or authorize sufficient annual resources, means and powers (work team, material resources, budget, among others) to the Compliance Team for the development of its functions and activities.
- The Compliance Team will have access to information related to its scope of action, to inform it in a timely manner of the measures and plans implemented in the fulfillment of its mission, to render an account of its management and to require the adoption of measures necessary for its mission (No. 3, Article 4, Law No. 20,393).
- The Compliance Team will disseminate and communicate the Crime Prevention Model to the workers of Cooke Chile S.A., as well as the roles and responsibilities that emanate from it and the sanctions for non-compliance with it. To this end, it may require the collaboration of different support areas to achieve the fulfillment of the objectives described.
- Cooke Chile S.A. will ensure compliance with all applicable laws, regulations and procedures, related to the crimes indicated in Article 1 of Law No. 20,393.
- The Crime Prevention Model will be updated when relevant changes occur in business conditions; an activity for which the Crime Prevention Officer will be responsible.
- The Crime Prevention Model must be subject to periodic reviews by independent third parties and based on these, it must establish mechanisms for improvement and/or updating (Number 4, Article 4, Law No. 20,393)

6. CRIMINAL LIABILITY OF LEGAL PERSONS

In December 2009, Law No. 20,393 was published in the context of Chile's incorporation into the OECD (Organization for Economic Cooperation and Development). This Law establishes that

legal entities will be responsible for the crimes of money laundering, financing of terrorism and bribery committed for their benefit.

Subsequently, in 2016, with the publication of Law No. 20,931, Law 20,393 was amended and the crime of reception was incorporated.

In November 2018, Law No. 20,393 was amended again by Law No. 21,121, incorporating four new economic crimes to the catalog, these are: bribery between private parties, disloyal administration, incompatible negotiation and misappropriation.

Two months later, on January 31, 2019, Law No. 21,132 was published, which modernizes the National Fisheries and Aquaculture Service (SERNAPESCA), incorporating four other new crimes to Law No. 20,393: Crime of water pollution (Article 136 of the Fisheries Law); Marketing of prohibited products (Article 139 of the Fisheries Law); Illegal fishing of seabed resources (Article 139 Bis of the Fisheries Law); and Processing, processing and storage of collapsed or overexploited products without proving legal origin (Article 139 Ter of the Fisheries Law).

In June 2020, Law No. 21,240 was published, which incorporates the sanction of non-observance of isolation or any other preventive measures ordered by the health authority, in the event of an epidemic or pandemic.

Subsequently, in April 2021, Law 21,235 was published, which incorporates the crime of smuggling of migrants and human trafficking.

In January 2022, Law 21,412 was published, which aims to strengthen the regulation related to the control and possession of firearms.

Previously, Law No. 20,393 established that the liability of legal persons will apply if the aforementioned crimes were committed directly for the benefit of the institution, by its owners, controllers, managers, main executives, representatives or those who carry out administration or supervision activities, provided that the commission of the crime was a consequence of non-compliance by the institution, of the duties of direction and supervision.

Notwithstanding the foregoing, with the publication of Law 21,595, made in August 2023, amendments are introduced to Law 20,393, among which we find; the increase in the number of crimes contemplated, the elimination of the need for benefit for the Company as a requirement to establish the criminal liability of the legal entity and the expansion of the subjects that will be responsible for the commission of an unlawful act.

As indicated in the latest update mentioned above, a legal person will be criminally liable when the crime is perpetrated within the framework of its activity by or with the intervention of a natural person who occupies a position, function or position in it, or provides services to it by managing its affairs before third parties, with or without its representation, provided that the perpetration of the act is favored or facilitated by the lack of effective implementation of an adequate model for the prevention of such crimes by the legal entity.

That is why Law No. 20,393 requires companies to adopt an **"effectively implemented Crime Prevention Model"**.

7. ROLES AND RESPONSIBILITIES

The roles and responsibilities of those responsible for the adoption, implementation, administration, updating and supervision of the Crime Prevention Model of Cooke Chile S.A. are detailed below:

8. CORPORATE GOVERNANCE OF COOKE CHILE S.A.

- Assign one or more individuals responsible for the application of the protocols and procedures of the Crime Prevention Model (Compliance Team), in accordance with the provisions of numeral 3, of article 4, of Law No. 20,393.
- Provide or authorize the provision of the resources and material and immaterial means necessary for the Compliance Team to fulfill its roles and responsibilities, based on the size and economic capacity of Cooke Chile S.A.
- Provide the Compliance Team with direct access to report in a timely manner on the measures and plans implemented in the fulfillment of its mission, to render an account of its management and require the adoption of measures necessary for its mission that may go beyond its competence.
- Grant the Compliance Team adequate independence for the performance of its functions and effective powers of supervision and direction, which must be communicated to the entire organization.
- Approve the Corporate Crime Prevention Policy.
- Ensure the correct implementation and effective operation of the Crime Prevention Model.
- Receive and analyze the management and operation reports of the Crime Prevention Model generated by the Compliance Team.
- Inform the Compliance Team of any situation observed which is related to Law No. 20,393 and the steps related to the Crime Prevention Model.
- Approve the performance of annual reviews of the Crime Prevention Model, by third parties independent of the Company, and supervise the implementation of improvement mechanisms based on such reviews.
- It is established that the LATAM Regional General Manager is the highest local figure of the company. However, it is crucial for the Crime Prevention Model (MDP) to have an investigation procedure or protocol in place in case of receiving complaints against the LATAM Regional General Manager. The investigation report must be managed and submitted to the Board of Directors of the company's parent company through the Crime Prevention Officer.
- Ensure the correct implementation and effective operation of the Crime Prevention Model in Cooke Chile S.A.
- Deliver the information required by the Compliance Team for the performance of its

functions related to the implementation, operation, and effectiveness of the Crime Prevention Model.

- Approve the Corporate Crime Prevention Procedure.
- Approve the Corporate Whistleblowing Procedure.
- Inform the Compliance Team of any situation observed that is related to Law No. 20,393 and the procedures of the Crime Prevention Model.
- Ensure the Compliance Team unrestricted access to information and people, as well as ensure the coordination of the activities of the Crime Prevention Model in the areas required.
- Implement the controls under its responsibility, which mitigate the risks of committing those crimes to which the Company is exposed, or inform the Compliance Team of any new risk that is identified.

9. ETHICS COMMITTEE

- The Ethics Committee will hold sessions to review the results of investigations related to the crime prevention model to decide on any matter that is under its responsibility.

Regarding the Crime Prevention Model, its main functions and responsibilities are:

- Ensure compliance with the Code of Ethics of Cooke Chile S.A., its values and fundamental principles.
- Support the Compliance Team in the different control activities that it carries out, mainly in the process of identifying and analyzing complaints applicable to the Crime Prevention Model, the determination of investigations and possible sanctions in this regard.
- Request reports related to investigations resulting from complaints from the Compliance Team, when circumstances warrant it.
- Handle received complaints, the results of the investigations and resolve the applicable sanctions in accordance with the proposal made by the Compliance Team.

10. COMPLIANCE TEAM

- Ensure the proper establishment and operation of the Crime Prevention Model, developed and implemented by Cooke Chile S.A.
- Encourage the internal processes and activities of Cooke Chile S.A. to have effective risk prevention controls for those crimes indicated in Law No. 20,393 and No. 21,595, in addition to maintaining the record of evidence of compliance and execution of these controls.
- Propose and request the Regional General Manager for LATAM of Cooke Chile S.A., the necessary means and resources to fulfill their role and responsibilities.
- Train employees on matters under the scope of Laws No. 20,393 and No. 21,595 and the

Crime Prevention Model implemented by Cooke Chile S.A., at least once a year.

- Report, at least semi-annually and/or when circumstances warrant it, to the Regional General Manager for LATAM of Cooke Chile S.A. on the operation and management of the Crime Prevention Model.
- Establish and comply with the Corporate Policy and Procedure of the Crime Prevention Model and suggest developing and implementing any other policy and/or procedure that it deems necessary to complement or strengthen the control environment of the existing Crime Prevention Model.
- Permanently evaluate the effectiveness and validity of the implemented Crime Prevention Model and its compliance with laws and other regulations, informing the Regional General Manager for LATAM of Cooke Chile S.A., regarding the need and convenience of its modification or updating.
- Review and analyze any unusual or suspicious complaint or operation of which it becomes aware by any means and to refer the case to the Regional General Manager for LATAM of Cooke Chile S.A. when appropriate. For the purposes of the analysis, the Compliance Team must collect all the documentation related to that operation, generating a background file for this purpose.
- Document and safeguard evidence related to crime prevention activities.
- Lead the process of periodic reviews by independent third parties and represent Cooke Chile S.A. before the company that will carry out the review of the Crime Prevention Model of Cooke Chile S.A.
- To follow up on recommendations or instructions resulting from the periodic review process by independent third parties, and to adopt mechanisms for improving or updating the Crime Prevention Model based on the findings of such evaluations.
- Ensure the updating of the Corporate Crime Prevention Policy and Procedure, in accordance with regulatory changes and the business environment of Cooke Chile S.A.
- Participate, when appropriate, in the lawsuits, complaints or legal proceedings that Cooke Chile S.A. decides to undertake in relation to the crimes indicated in Article 1 of Law No. 20,393 and provide all relevant information in its possession or of which it is aware.
- To carry out special work that the Regional General Manager for LATAM of each of the companies that make up Cooke Chile S.A. entrusts to him/her, in relation to the matters of his/her competence.

11. AREAS OF SUPPORT FOR THE CRIME PREVENTION MODEL

The main areas of support for the Crime Prevention Model are the following:

- Finance Management
- Human Resources Management LATAM
- IT Management
- Plant Management
- Operations Management
- Seawater Production Management
- Freshwater Production Management
- Technical Assistant Manager
- Legal Management
- Concessions Management & Regulatory Compliance

In addition, other areas will provide support to the Crime Prevention Model, to the extent that their intervention is required. The accountability control activities of each support area are detailed in the "Crime Prevention Procedure" document.

12. WORKERS, CONSULTANTS, CONTRACTORS AND SUPPLIERS

- They must comply with the provisions of this Policy and the Crime Prevention Model implemented by Cooke Chile S.A.
- They must report, through the established channels, situations that could go against the provisions of this Policy and the Company's Crime Prevention Model.

13. APPROVAL AND UPDATE

For all purposes, this document was approved by the Regional General Manager for LATAM of Cooke Chile S.A in the session dated December of 2024.

The Corporate Crime Prevention Policy will be reviewed and updated as needed, as of its entry into force, by the Compliance Team, who will propose to the Regional General Manager for LATAM of each company the corresponding changes in both form and substance.

DOCUMENT CHANGE CONTROL

Crime Prevention Policy			
Date:	Modified by:	Reviewed by:	Approved by:
November 2024	Deloitte	Crime Prevention Officer	Regional General Manager for LATAM - Cooke Chile S.A.