



CRIME

**PREVENTION MODEL MANUAL**

LAW No. 20.393

COLBÚN S.A.  
AND COLBÚN FOUNDATION

JULY 2024

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## I. INTRODUCTION

Colbun S.A. and Colbun Foundation (hereinafter Colbun, unless otherwise expressed, any reference to the Company includes both entities), in compliance with the provisions of Law No. 20.393 on criminal liability of legal entities and its respective updates and/or amendments (hereinafter Law No. 20.393), has developed the Crime Prevention Model (referred to CPM) in order to regulate the actions of directors, employees, and third parties connected with Colbun, with the aim of preventing the commission of applicable crimes. Through the CPM, we aim to manage the main risks of committing crimes and foster a culture of prevention within the Company.

## II. OBJECTIVE

This document aims to provide the necessary guidelines for the proper and timely implementation of the Crime Prevention Model (CPM) developed by Colbun.

## III. SCOPE

Compliance with this Manual and the Crime Prevention Model (CPM) is mandatory for directors, executives, employees, suppliers, contractors, subcontractors, advisors, and others associated with Colbun.

## IV. CRIME PREVENTION MODEL

Colbun explicitly rejects and prohibits any actions or behaviors that are contrary to Law No. 20.393, as well as any other current laws and regulations.

In accordance with the above and as established in Article 4 of Law No. 20.393, Colbun has developed a Crime Prevention Model (CPM) that addresses the risks associated with its activities and operations. This model comprises a range of tools, procedures, and activities for prevention, detection, response, oversight, and monitoring, applied to processes or activities where there is a risk of committing the offenses outlined in Article 1 of Law No. 20.393.

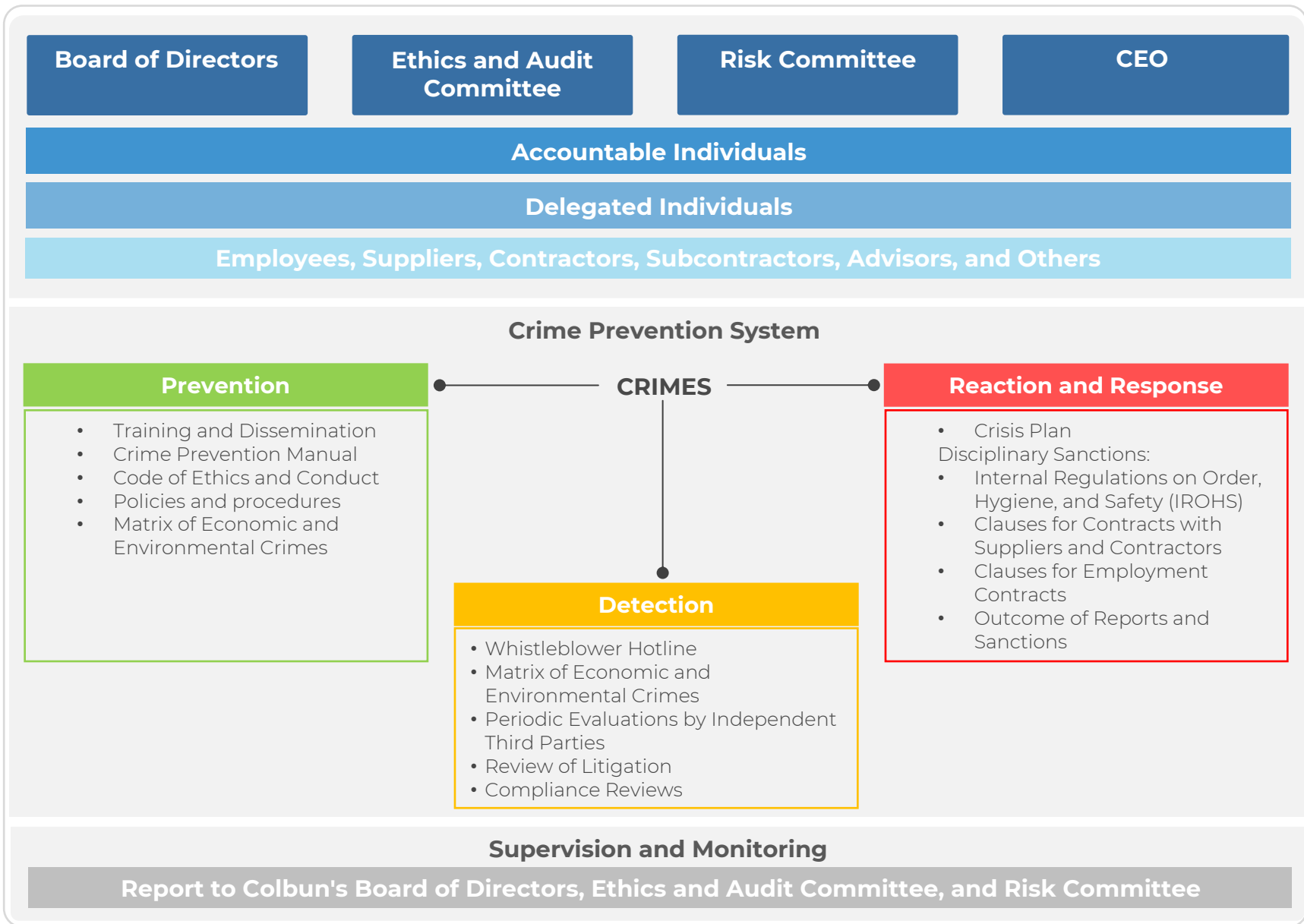
The responsibility for the CPM rests with the Board of Directors of Colbun S.A. and the Board of Trustees of Colbun Foundation, hereinafter referred to as the "Colbun Boards". These Boards, in turn, appoint and delegate the oversight to Accountable Parties.

Colbun's CPM includes the following elements:

- a.** Identification of activities or processes that may involve risks of committing the crimes outlined in Law 20.393.
- b.** Establishment of protocols and procedures to prevent and detect criminal behavior within the context of the activities mentioned in the previous point.
- c.** Implementation and operation of secure reporting channels and internal sanctions in the event of non-compliance.
- d.** Assignment of one or more individuals responsible for implementing the protocols and processes that are part of the Crime Prevention Model.
- e.** Provision for periodic evaluations by independent third parties and mechanisms for improvement or updating based on these assessments.

The following diagram shows the main activities and components that make up Colbun's Crime Prevention Model:

# CRIME PREVENTION MODEL



## 4.1 ROLES AND RESPONSIBILITIES

The following outlines the main departments and/or management teams within the Company that are involved in the operation of the Crime Prevention Model, each with specific responsibilities that facilitate its proper management and oversight:

### 4.1.1 Colbun's Board of Directors

- a. Approve the Crime Prevention Model and its amendments.
- b. Designate the Accountable Individuals and provide the necessary means, authority, and resources for them to fulfill their roles and responsibilities, ensuring they have sufficient autonomy from Management.
- c. Regularly review the main crime risks, the level of prevention, and the management carried out by the Accountable Individuals, using the established accountability mechanisms.
- d. Supervise and monitor the effective implementation of the Model and the achievement of its objectives.
- e. Inform the Accountable Individuals of any observed situations that may constitute a crime or a breach of the Crime Prevention Model.

### 4.1.2 Ethics and Audit Committee

- a. Be informed about the functioning of the Crime Prevention Model and support the Board of Directors in its supervisory role by providing a summary of its performance.
- b. Support the Accountable Individuals in fulfilling their roles as assigned by the Board of Directors.
- c. Be aware of the reports and outcomes of investigations into potential breaches of the Crime Prevention Model, as well as the sanctions imposed.

### 4.1.3 Risk Committee

- a. Understand, monitor, and manage the risks identified in Colbun's Matrix of Economic and Environmental Crimes.
- b. Supervise compliance with control activities defined by the owners of each process.
- c. Report to the Board of Directors on significant risks that have been evaluated.

#### 4.1.4 Chief Executive Officer

- a. Promote adherence to the Crime Prevention Model and ensure commitment from all employees to understand, practice, and disseminate its contents.
- b. Support the Accountable Individuals in performing their functions as required.
- c. Inform the Accountable Individuals of any observed situations that may constitute a crime or a breach of the Crime Prevention Model.
- d. Support and assist the Accountable Individuals by ensuring they have access to the necessary information for fulfilling their roles and by coordinating activities related to the Crime Prevention Model.

#### 4.1.5 Accountable Individuals

Colbun's Board of Directors has designated the Legal Manager and the Internal Audit Manager as Accountable Individuals, who must:

- a. Ensure the proper implementation, execution, and operation of the Crime Prevention Model.
- b. Ensure the continuous and adequate identification of the main crime risks and that preventive actions (responses) are designed and implemented.
- c. Conduct periodic monitoring of crime risks, focusing on those with low levels of prevention.
- d. Ensure that staff are informed about and understand the key aspects related to Law 20.393, the Crime Prevention Model, and their role and responsibilities within it.
- e. Review the Crime Prevention Model annually to identify and correct weaknesses and update it as needed due to organizational changes or other factors that might affect its proper execution.
- f. Report on the performance of their role at least semiannually to Colbun's Board of Directors and quarterly to the Ethics and Audit Committee.
- g. Activate the crisis plan if they detect or are informed of an incident that may be identified as an economic crime.
- h. Support the elements of the Crime Prevention Model in the documentation platform established by the organization.
- i. Report any criminal acts defined by law to the relevant authorities.

#### 4.1.6 Delegated Individuals

- a. Identify and report to the Accountable Individuals any crime risks that arise or increase in their respective areas, and design, implement, and execute the necessary controls to prevent the occurrence of identified risks.
- b. Ensure that employees under their supervision follow the protocols, procedures, and controls established by the Company to prevent and detect the commission of crimes defined by law.
- c. Support and assist the Accountable Individuals by ensuring they have access to the necessary information to fulfill their roles and by coordinating activities related to specific aspects of the Crime Prevention Model.
- d. Integrate compliance practices into the business and daily activities of their area.
- e. Activate the crisis plan if they detect or are informed of an incident that may be identified as an economic crime.

#### 4.1.7 Employees, Suppliers, Contractors, Advisors, and Others

##### Employees:

- a. Refrain from engaging in conduct that could constitute any of the crimes listed in Article 1 of Law No. 20.393, as specified in their employment contracts.
- b. Understand and comply with the provisions and implications of Law No. 20.393, Colbun's Crime Prevention Model, and adhere to it.
- c. Report, through the Whistleblower Hotline, any violations of the Crime Prevention Model or actions or behaviors that could potentially constitute crimes under Law No. 20.393 that they become aware of.
- d. Inform the area manager of any events that could constitute a crime to initiate the crisis management plan.
- e. Implement the controls defined to mitigate the risk of committing crimes in their areas of responsibility.

##### Suppliers, Contractors, and Advisors:

- a. Refrain from engaging in conduct that could constitute any of the crimes listed in Article 1 of Law No. 20.393, as specified in the contractual clause.
- b. Report, through the Whistleblower Hotline, any violations of the Crime Prevention Model or actions or behaviors that could potentially constitute crimes under Law No. 20.393, committed by their own owners or employees, or by those of Colbun.



## 4.2 PREVENTION ACTIVITIES

Control activities aimed at preventing breaches of the Crime Prevention Model (CPM), its related policies and procedures, and/or behaviors that could constitute crimes under Law No. 20.393.

### 4.2.1 Training and Dissemination

The Accountable Individuals are tasked with coordinating periodic training sessions for Colbun's directors, executives, employees, and suppliers. The objective of this training is to inform and educate about the existence, content, and functioning of the Crime Prevention Model (CPM), as well as the relevant aspects of Law No. 20.393. These training sessions can be conducted in-person or virtually and may be supplemented with communications via email and intranet.

Additionally, to disseminate the Crime Prevention Model among all employees and third parties associated with Colbun (suppliers, contractors, advisors, and clients), the Accountable Individuals will manage the publication and dissemination of the Crime Prevention Manual on the Company's website and intranet.

### 4.2.2 Crime Prevention Manual

The Crime Prevention Manual outlines the components of the Crime Prevention Model implemented by Colbun, as established by Law No. 20.393 on the Criminal Liability of Legal Entities.

### 4.2.3 Code of Ethics and Conduct

The Code of Ethics and Conduct establishes the ethical behavior standards expected of everyone who is subject to its adherence. Its goal is to serve as a guide for all Colbun employees, based on respect for individuals, transparency, integrity, and compliance with laws and regulations. The Code includes elements that help to prevent the commission of crimes defined by Law No. 20.393, thus contributing to the compliance with the Crime Prevention Model and strengthening organizational ethics.

#### 4.2.4 Policies and Procedures

Corporate policies and procedures establish the definitions, standards, guidelines, and controls that guide the execution of activities, operations, and decision-making within the Company. These documents help to prevent the misuse of Colbun's resources for criminal activities and support consistency, legality, and transparency in the Company's operations.

The company's policies and procedures are published and available on the official intranet.

### 4.3 DETECTION ACTIVITIES

Control activities aimed at detecting breaches of the Crime Prevention Model (CPM) or potential scenarios that could lead to the commission of crimes specified in Law No. 20.393.

#### 4.3.1 Whistleblower Hotline

Colbun has established a Whistleblower Hotline designed to provide any individual or stakeholder (employees, shareholders, customers, suppliers, and/or communities) with a secure and confidential tool for reporting any issue related to the Company that may be considered a breach or violation of the provisions set forth in the Code of Ethics and Conduct, the Crime Prevention Model, internal policies, and/or applicable laws, or any conduct that violates Human Rights or is contrary to our purpose and values.

The hotline allows for anonymous or named reports. In all cases, the Company conducts an independent, confidential investigation with no retaliation, and provides an appropriate response and resolution to the report made.

Reports can be submitted through the following channels:

- a) Colbun's website: <https://www.denunciascolbun.cl/>
- b) Email: [comitedeetica@colbun.cl](mailto:comitedeetica@colbun.cl)
- c) Letter addressed to the Internal Audit Manager at: Avenida Apoquindo #4775, Piso 13, Las Condes.

#### 4.3.2 Matrix of Economic and Environmental Crimes (MEEC)

Colbun has established a Matrix of Economic and Environmental Crimes (MEEC), designed to identify, understand, and highlight the risks within the Company related to the commission of crimes defined by Law No. 20.393.

This matrix, developed by the Accountable Individuals in collaboration with the Delegated Individuals and with the support of employees from relevant areas, includes:

- a) Identification of the processes or activities within the Company that pose risks of committing the crimes defined by Law No. 20.393.
- b) Assessment and quantification of risk levels to prioritize and determine areas or processes with the highest exposure.
- c) Identification and evaluation of existing controls to prevent the occurrence of the identified risks.

The MEEC must be reviewed at least annually or whenever there are changes in the organization's processes that significantly impact its content.

#### **4.3.3 Periodic Assessments by Independent Third Parties**

Colbun will conduct periodic assessments of its Crime Prevention Model (CPM) by independent third parties, as required by Law No. 20.393, to analyze its proper design and effective implementation.

#### **4.3.4 Review of Litigation**

The Legal Department will provide the Accountable Individuals with reports at least quarterly on lawsuits, legal disputes, fines, and violations involving Colbun that relate to the commission of any of the crimes listed in Article 1 of Law No. 20.393. This is to detect breaches of the Crime Prevention Model and assess the necessary measures for addressing them.

#### **4.3.5 Compliance Reviews**

The Internal Audit Department will conduct periodic reviews to validate the implementation of controls designed by Management to mitigate significant risks of committing the crimes covered under Law No. 20.393.

### **4.4 REACTION AND RESPONSE ACTIVITIES**

Activities aimed at establishing resolutions, disciplinary measures, and/or sanctions related to non-compliance with the Crime Prevention Model (CPM) or the commission of offenses under Law No. 20.393. Response activities will focus on preventing the recurrence of similar breaches or non-compliance and sanctioning the offender.

#### **4.4.1 Crisis Plan**

Colbun has a Crisis Management Plan available in the Corporate Crisis Management Manual. It is designed to address any threats of non-compliance or incidents that may be classified as "economic or environmental crimes." It supports prompt and effective decision-making to manage these situations. The plan can be activated at different levels, as specified in the roles and responsibilities section of this manual.

#### **4.4.2 Disciplinary Sanctions**

Colbun may impose disciplinary actions on employees who violate the Crime Prevention Model (CPM) or commit any crimes outlined in Law No. 20.393, once the investigation has concluded and the violations have been confirmed.

#### **4.4.3 Internal Regulations on Order, Hygiene, and Safety (IROHS)**

In accordance with Article 4, Section 3, Letter d, of Law No. 20.393, Colbun has established obligations and prohibitions for the prevention of the crimes covered by this law. These are incorporated into the Internal Regulations on Order, Hygiene, and Safety (IROHS), which all employees are required to know and comply with, as detailed in TITLE XVII, "CORPORATE CRIMINAL LIABILITY AND PREVENTION OF CRIMES UNDER LAW No. 20.393."

Additionally, TITLE XVII specifies the sanctions that will be applied for potential violations of these regulations.

#### **4.4.4 Clauses in Contracts with Suppliers and Contractors**

Agreements with suppliers and/or contractors include a clause requiring them to adhere to and comply with Colbun's Crime Prevention Model (CPM) for the duration of the contract. They must also avoid engaging in any conduct that could be considered a crime under Law No. 20.393. This clause further obligates suppliers and contractors to report any actions that could potentially result in illegal acts covered by the Law.

In addition, the clause specifies that any breach of these requirements entitles the Company to implement necessary or appropriate disciplinary actions and to pursue any relevant civil, criminal, or administrative measures.

#### 4.4.5 Clauses in Employment Contracts

Employment contracts include a compliance clause for the Crime Prevention Model (CPM), stipulating that employees must know and follow the obligations and prohibitions outlined in the CPM. This clause also details potential sanctions for non-compliance, which will be considered an integral part of the employment contract for all legal, labor, and related purposes.

#### 4.4.6 Outcome of Reports and Sanctions

The Accountable Individuals must maintain an up-to-date record of received reports, closed investigations, and ongoing cases. This record should include the actions taken, resolutions made, and disciplinary measures applied in relation to breaches of the Crime Prevention Model (CPM) or violations of the offenses specified in the Law that have been identified.

### 4.5 SUPERVISION AND MONITORING

The purpose of monitoring activities is to establish controls that ensure the proper design and operation of the Crime Prevention Model (CPM), minimizing the risk of committing any of the offenses outlined in the Law on Corporate Criminal Liability.

The Accountable Individuals may carry out the following monitoring activities:

- a. Review of supporting documentation for evidence provided by various departments.
- b. Re-examination of control activities (through sampling).
- c. Analysis of the reasonableness of transactions.
- d. Verification of compliance with restrictions established in procedures.

This should be continuously updated based on the context of both the Company and the law.

#### 4.5.1 Reporting to Colbun's Board of Directors, Ethics and Audit Committee, and Risk Committee

This activity involves keeping the Ethics and Audit Committee, the Risk Committee, and Colbun's Board of Directors adequately informed about the key aspects related to the management of the Company's Crime Prevention Model.

The report should include the progress of the measures and plans implemented to comply with the Crime Prevention Model (CPM), considering all its components and activities. It must be produced at least every six months.