

| Саманснаса | | | | | |
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| MANAGEMENT | | Corporate audit and Internal Control & Crime Prevention Management | | | |
| DEPARTMENT | | Crime Prevent | Crime Prevention | | |
| DOCUMENT TITLE CON | | Complaint Pro | Complaint Procedure | | |
| CODE PR-CN | | PR-CM-EPD-00 | R-CM-EPD-007 v2 | | |
| PARTICIPANTS | | | Position | SIGNATURE | |
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| REVIEWED BY: | By: Rafael Le-Bert | | Corporate Legal Counsel | | |
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| APPROVED BY: Marcelo Aguilera | | Corporate audit, internal control and fraud prevention manager | | | |

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| CODE | PR-CM-EPD-007 | |
| VERSION | 002 | |
| APPROVAL DATE | 06-30-20 | |

I. Objective

Establish standards that regulate the reception, analysis, investigation, response and disclosure of complaints received through the formal channels available to Camanchaca S.A. and its subsidiaries in matters related to violations of Law 20,393 on "Criminal Liability of Legal Entities" and its amendments, breaches of fair competition, violations of environmental regulations, Violations of occupational or labor safety regulations, Violations of Corporations Law and Securities Market Law, and breaches of the code of ethics and internal regulations of some of the Camanchaca group companies.

II. Scope

This procedure is applicable to all employees of Camanchaca S.A. and its subsidiaries, as well as all those third parties that interact with the organization, such as suppliers, contractors, agents, distributors, customers, competitors, public officials, among others, which we will hereinafter refer to as "third parties".

III. Definitions

Complaints channel: Means by which company workers or related third parties (suppliers, contractors, clients, etc.), can make their complaints about violations of Law 20,393 on "Criminal Liability of Legal Entities" and its modifications, breaches of fair competition, Violations of environmental regulations, Violations of occupational or labor safety regulations, Violations of the Public Limited Companies Law and the Securities Market Law, and breaches of the code of ethics and internal regulations.

Breaches of the Code of Business Conduct and Ethics: Any violation of the provisions of the Code of Business Conduct and Ethics, whether the violation corresponds to violations of laws and regulations to which the Company or its employees are subject; or that the infraction corresponds to violations of the internal policies that the Company has adopted to combat risks of illegalities, such as corruption, fraud, abuse of authority, serious danger to the health and public safety of workers; or any concealment of any malpractice that may have detrimental effects on the Company or its employees.

Crime: Any voluntary action or omission punishable by law is a crime.

Complaint: It is the act of informing the Company through its reporting channel of a questionable, inappropriate behavior or situation, or apparent breach of laws, regarding those crimes referred to in Law 20,393 and its subsequent amendments (Law 20,931, Law 21,121 and Law 21,132), breaches of fair competition, breaches of environmental regulations, breaches of occupational or labor safety regulations, breaches of the Public Limited Companies law and the Securities Market Law, and breaches of the code of ethics and regulations internal.

Complainant: Subject that through established and regular channels can reveal or make known complaints, according to its previous definition.

Sanction: Penalty to be received by the person who commits an offense associated with the breach of Law 20,393 on "Criminal Liability of Legal Entities" and its amendments, breaches of fair competition, violations of environmental regulations, Violations of occupational safety regulations or labor, Violations of the Public Limited Companies Law and the Securities Market Law, and breaches of the code of ethics and internal regulations.

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Fraud: any action or omission that through deception or voluntary breach of legal obligations (legal or contractual), produces an error in another, inducing them to carry out an act of disposal to their own or others' detriment. This conduct can be carried out by people who belong to the company or third parties outside it.

Third parties: Any natural or legal entity, who is linked either by a commercial, legal or other relationship with Camanchaca S.A. or its National Subsidiaries.

Money Laundering: Anyone who in any way hides or disguises the illicit origin of certain goods, knowing that they come, directly or indirectly, from an illicit. Or whoever acquires, possesses, has or uses the aforementioned assets, for profit, when at the time of receiving them, they have known their illicit origin. (Article 27, Law No. 19,913).

Financing Terrorism: Anyone who, by any means, requests, collects or provides funds in order to be used in the commission of any of the terrorist crimes, which are those that, committed with the purpose of producing in the population or a part of it the fear of being a victim of crimes of the same kind, correspond to any of the following situations: homicide, kidnapping, sending letters or explosive parcels, fire and damage, crimes against public health, seizing or attacking a ship, aircraft, railroad, bus or other means of public transport, attempt against the life or integrity of the head of State or other political, judicial, military, police or religious authority, detonate bombs, associate to commit the aforementioned crimes. (Law No. 18,314).

Bribery:

- Anyone who offers or agrees to give a public employee an economic benefit, for the benefit of the latter or a third party, to perform improper actions or omissions in their work. (Penal Code Article 250).
- Whoever offers, promises or gives to a foreign public official, an economic or other benefit, for the benefit of them or a third party, to carry out an action or incur an omission with a view to obtaining or keeping, for themself or other, of any undue business or advantage in the field of any international transaction. (Penal Code, Article 251bis).

Receiving stolen goods: Whoever knowing their origin or being unable to do anything less than knowing it, has in their possession, in any way, stolen, misappropriated or animal rustling, and knowing their origin or being unable to avoid knowing it, transports, purchases, sells, transforms or markets them in any form, even if they had already disposed of them (law 20,931).

Corruption Between individuals (Law 20.121):

- Art. 287 bis. Any employee or agent who requests or accepts to receive an economic benefit or of another nature, for themselves or a third party, for prioritizing or for having prioritized the selection of one bidder over another while performing their duties, will be sanctioned with the penalty of imprisonment lower in its average degree and a fine of as much as four times the benefit requested or accepted. If the benefit is of a different nature than the economic one, the fine will be from fifty to five hundred monthly tax units.
- Art. 287 ter. Anyone who offers or agrees to offer an employee or agent a financial or non-financial benefit, for themselves or for a third party, for prioritizing or for having prioritized the selection of one bidder over another, will be punished with the penalty of imprisonment, lower in its average degree, in the case of the benefit given or offered, or lower seclusion in its minimum degree, in the case of the benefit granted. In addition, he will be sanctioned with the penalties of fine indicated in the preceding article.

Disloyal Administration: Anyone who, being in charge of the safeguarding or management of the assets of another person, or any part of it, by virtue of the law, an order of the authority, a deed or contract, and who causes harm, either by abusing their responsibilities, or by executing or omitting to execute a transaction in a manner manifestly contrary to the interest of the owner of those assets. (Law 21.121).

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Misappropriation: Anyone who, to the detriment of another, appropriate or distract money, effects or any other tangible object that has been received as a deposit, commission or administration, or by other title that produces an obligation to deliver or return it (Law 21.121).

Improper Negotiation: Conduct of the director or manager of a corporation that is directly or indirectly interested in any negotiation, action, contract, operation or management that involves the company, in breach of the conditions established by law, as well as the conduct of any person to whom the rules on duties established for the directors or managers of these companies are applicable. (Law 21.121).

Water Pollution: Anyone, without authorization, or in breach of 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 hydro-biological resources (Law 21.132).

Marketing Prohibited Products: The processing, holding, transformation, transportation, commercialization and storage of prohibited hydro-biological resources, and the elaboration, commercialization and storage of products derived from them. (Law 21.132).

Illegal Fishing of marine resources: Anyone who extracts benthic resources in areas where they are managed without the corresponding authorization (Law 21.132).

Processing, Storage or Utilization of Scarce Resources: Anyone who processes, elaborates or stores hydrobiological resources or products derived from them, but cannot prove their legal origin, and which correspond to resources in a state of collapse or overexploitation (Law 21,132).

Fraud in obtain employment protection benefits: Anyone who obtains supplements and / or benefits through impersonation or deception and, who in the same way, obtain a benefit greater than that which corresponds to them and that were committed directly and immediately in their interest or for their benefit (Law 21,227).

Non-compliance of isolation and other measures ordered by the authority, in the event of an epidemic or **pandemic:** Employers who knowingly and having the authority to control an employee's work, require an employee to attend their workplace, which is not their residence, while that employee is subject to quarantine or compulsory sanitary isolation decreed by the health authority (Law 21.240).

Fair Competition: Represents the freedom of decision of those who participate in the market, in a context in which the rules of the game are clear to all and are effectively enforced. **Fair competition** is fundamentally based on freedom of choice for both the consumer and the producer.

Acts against Free Competition (in aspects of Decree Law 211): Anyone who executes or celebrates, individually or collectively, any fact, act or convention that prevents, restricts or hinders fair competition, or that tends to produce said effects.

Environmental Standards: Includes those standards whose objective is to ensure the protection of the environment, the preservation of nature and the conservation of environmental heritage, and impose an obligation or requirement whose compliance must be accredited by the owner of the project or activity during the evaluation process.

Occupational or labor safety regulations: Occupational safety is understood as the set of techniques and procedures that are intended to avoid and, where appropriate, eliminate or minimize the risks that may lead to the materialization of accidents during work, that is, avoid injuries and the acute effects produced. by dangerous agents or products.

Code of Business Conduct and Ethics: Guide for each employee, regardless of their hierarchical rank, to promote a conduct based on a behavior whose seals and character correspond to those that the company wishes to promote.

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| Internal regulation of order, hygiene and safety: administrative instru- the requirements, obligations, prohibitions and sanctions, to which a work, permanence and life in the company. The preparation of the companies that normally have 10 or more permanent workers. | all workers must abide, in | relation to their |

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IV. Politics (*)

- 1. The complaints will be nominative. Anonymous complaints will not be accepted.
- 2. All complaints received will be treated **CONFIDENTIALLY**, safeguarding the identity of the complainant.
- 3. The Company has established six categories of complaints, which will have the following responsible for managing them:

| N° | Complaint | Responsible for Managing |
|----|--|--------------------------------|
| 1 | Crime Prevention Model (Money Laundering, Terrorism Financing, Bribery of National and Foreign Public Officials, Reception, Corruption between Private Parties, Unfair Administration, Misappropriation, Improper Negotiation, Water Pollution, Commercialization of banned products, Illegal fishing, and Processing and storage of products scarce without proving legal origin) | СРО |
| 2 | Breaches of fair competition | CPO/ Legal affairs management |
| 3 | Breaches of environmental regulations | CPO / Legal affairs management |
| 4 | Breaches of occupational or labor safety regulations | Human Resources management |
| | Breaches of the Corporations Law and the Securities Market Law | |
| | Use of inside information | CPO / Legal affairs management |
| 5 | Use or disclosure of proprietary or confidential information | CPO / Legal affairs management |
| | Information security breaches | CPO / Legal affairs management |
| | Adulteration or falsification of the Financial Statements | СРО |
| | Code of Ethics and Internal Regulations | |
| | Fraud, robbery, theft | СРО |
| | Interest conflict | СРО |
| 6 | Workplace Harassment | Human Resources management |
| | Sexual harassment | Human Resources management |
| | Other breaches of the Code of Ethics and Internal Regulations (indicate) | Human Resources management |

- 4. No instance (managements or areas) may retaliate against any person who in good faith makes a complaint under the parameters of this procedure. Any reprisal will be ground for investigation and eventual sanctions.
- 5. The Company has established five complaints channels, which will be available to all workers, suppliers, consultants, clients, contractors and / or third parties who need to make a report. Namely:
 - Complaints Channel (<u>https://denuncias.camanchaca.cl/Denuncias/Ingresar</u>)
 - Email (<u>marcelo.aguilera@camanchaca.cl</u>)
 - Telephone (+56 2 2873 2900)
 - Certified letter addressed to (Av. El Golf 99, Piso 10, Las Condes, Santiago)
 - Personal interview (Crime Prevention Officer)
- 6. The administration of the Web Report Channel will be under the responsibility of the Audit Manager & Crime Prevention Officer.

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- 7. It will be the obligation of each person responsible to manage the complaints, keep a record of them, the investigations made, the sanctions adopted or, where appropriate, the reason for filing the complaint.
- 8. Any investigation that is initiated, must be carried out in strict compliance with the law, respecting at all times and under all circumstances the constitutional guarantees of all the people interviewed.
- 9. In the context of an investigation, the person responsible for the investigation may require all the physical and material information necessary for the successful performance of the investigation, <u>being mandatory</u> for all workers to provide or manage to obtain the required information and participate in the interviews that are required.
- 10. Any investigation must be resolved within a period not exceeding 60 days, with the possibility of extending the period up to 120 days with the prior approval of the hierarchical superior of the person responsible for managing the complaint, depending on its complexity.
- 11. It is the duty of the worker who is part of an investigation, or whoever is aware of it, keep absolute confidentiality regarding the information that is communicated to them.
- 12. Any worker who has a well-founded and objective background related to a complaint that leads to an investigation, has the obligation to inform the person responsible for managing the complaint at the same time that he learns of the investigation process in progress.
- 13. The lack of collaboration in the implementation and compliance of the crime prevention program guidelines by employees will be grounds for sanction, who will be subject to the disciplinary actions that the Board of Directors, the Administration and / or the CPO deem to propose.
- 14. Any violation of the crime prevention model (law 20,393 and its subsequent amendments), breaches of fair competition rules, violations of environmental standards, breaches of occupational or labor safety standards, violations of the law of open limited companies and Securities market law, and breaches of the code of ethics and internal regulations, may give rise to disciplinary labor sanctions or / to terminate the respective contract, as stipulated in the internal regulations of order, hygiene and safety. The foregoing, without prejudice to the administrative, civil or criminal sanctions that, where appropriate, may also result from it.
- 15. Camanchaca S.A. and its subsidiaries have determined to apply in their policies and procedures the provisions contained in Law No. 20,393 on Criminal Liability of Legal Entities. This law punishes companies that commit the crimes of Money Laundering, Terrorism Financing, Bribery of National and Foreign Public Officials, Reception, Corruption between individuals, Unfair Administration, Misappropriation, Improper Negotiation, Water Pollution, Marketing of prohibited products, Illegal fishing, and Processing and storage of scarce products without proving legal origin. Due to this, and in accordance with the provisions contained in the Internal Regulation of Order, Hygiene and Safety, in the Code of Ethics and in the respective employment contracts, it is prohibited to the workers of Camanchaca S.A. and subsidiaries participate in acts or commit actions that violate the provisions of said law, and the pertinent internal regulations that are part of the company's Crime Prevention Model.

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V. Procedure

A. Making and Receiving Complaints

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| | Report any irregular situation with respect to what is established in the crime prevention model (law 20,393 and its subsequent amendments), fair competition rules, environmental regulations, occupational or labor safety regulations, the law on open limited companies and the securities markets law, and the code of ethics and internal regulations of Camanchaca SA and its subsidiaries. Use one of the five established reporting channels. If: a. Use the web complaint channel → |
| Workers of Camanchaca S.A. and its Subsidiaries and / or Suppliers, Advisors, | ✓ Enter the company's website (www.camanchaca.cl or www.salmonescamanchaca.cl). ✓ Enter the data described in "V Procedure, letter A, making and receiving complaints, numeral 3". ✓ Once the complaint is made, the system will send an email to the complainant to validate their complaint. This will only be considered if the user carries out the validation process. ✓ The system will deliver to the complainant, a code with which they can track the status of the complaint. |
| Clients, Contractors and | b. Does not use web complaint channel \Rightarrow Make a complaint through the |
| / or Third Parties | other channels enabled and indicated in point "IV Policy, number 5". 3. Describe in detail, regardless of the channel used, the incident that motivates the complaint, which must contain at least the following: a. Name, telephone or email of the person making the report. b. Select the type of complaint according to the categories defined in point "IV Policy, number 3". c. Indicate the date, time and place where the incident occurred, if possible. d. People involved in the situation. e. Any other information that may be valuable in the evaluation and final resolution of this situation. f. Attach supporting information (for example: documents, photos, video recordings, among others). |

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| RESPONSIBLE | Action |
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| | 4. Write down the complaint in the register destined for the effects. If it corresponds to the web reporting channel, these will be backed up in the system, otherwise an Excel spreadsheet will be taken for the rest. |
| | 5. Evaluate the merit of the complaint based on the information provided. If: a. Not applicable → Evidence will be left as to why an investigation was not initiated. b. If appropriate → The investigation will begin. |
| | 6. Notify the complainant within a period of no more than 5 business days that their complaint was received and whether or not it was considered. If: a. Use the web complaint channel → The system will automatically send an email informing you of the reason why your complaint was rejected or rejected. Otherwise, it will be understood as accepted, being the responsibility of the complainant to follow up through the system with their complaint code. |
| Responsible for Managing and Investigating the complaint | b. Does not use web complaint channel → Communicate through the same means by which the complaint was made, the reason why your complaint was rejected or rejected. Otherwise, it will be understood as accepted, being the responsibility of the complainant to check the status of their complaint. |
| · | Failure to proceed with the investigation if there are insufficient merits or if the complaint does not meet the minimum requirements established in point 3 above. |
| | 8. Inform the direct superior instance, according to the following criteria, the receipt of a complaint that on its merit must be investigated: a. Inform the Board of Directors of the Company → Crime prevention model (law 20,393 and its subsequent amendments), Breaches of fair competition rules, breaches of environmental regulations, breaches of occupational or labor safety regulations, breaches of the law on open limited companies and market law of values. b. Inform the General Manager of the Division and the Corporate General Manager → Failure to comply with the code of ethics and internal regulations (IV Policy, numeral 3). Notwithstanding that these are subsequently reported to the Company's Board of Directors. |

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B. Investigation of Complaints

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| | 1. | Initiate the investigation or designate the person in your area who will carry out the investigation of the reported events. |
| | 2. | Analyze, if necessary, the hiring of external professional services to support the investigation prior communication and approval by the direct superior instance indicated in point "V Procedure, letter A, number 8". |
| | 3. | Request, if necessary, support from other areas of the organization to analyze or support the investigation. |
| Responsible for Managing and Investigating the complaint | 4. | Analyze the information provided by the complainant and, if necessary: a. Collect additional information. b. Interview the personnel involved in the complaint. c. Analyze the information obtained. d. Document the investigation carried out (procedures and tests carried out) and the results obtained. e. Conclude about the research carried out. f. List the corrective measures that can be applied. Issue a Report on the existence or not of the acts constituting the infraction, lack or irregularity reported, and if they are corroborated, make a proposal for applicable sanctions, in accordance with the provisions of the Internal Regulation of Order, Hygiene and Safety. This Report must be in writing and be duly founded |
| | 6. 7. 8. | and supported by the evidence obtained from the investigation. The report must contain: a. Identification of the accused. b. Witnesses who testified. c. Description of the facts presented d. Support or evidence (documents, photos, recordings, etc.) e. Conclusions f. Proposal for sanctions (if applicable) Send report to the direct superior instance for its knowledge and resolution, as established in point "V Procedure, letter A, number 10". If the investigated facts could be considered a crime, the Board of Directors will be able to evaluate the relevance of forwarding the antecedents to the competent authorities. |

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C. Investigation Resolution

| RESPONSIBLE | Action |
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| Direct Superior Instance (Board of Directors and / or Administration) | Evaluate together with the CPO, the General Manager and the Manager of Legal Affairs the sanction to be applied, as stipulated in the Internal Regulation of Order, Hygiene and Safety. The foregoing, without prejudice to the fact that the company could, considering the seriousness of the facts, terminate the contract of the worker involved invoking legal cause or it is determined to report to the Public Ministry. If the investigated facts could be considered a crime, the evaluation of the sanction will correspond to the Board of Directors, as well as the decision to report to the Public Ministry, the Financial Market Commission, the National Economic Prosecutor's Office, the Superintendency of the Environment, or to the corresponding authority (s); instructing the Legal Affairs Management and the CPO to take the necessary measures to proceed with the respective legal complaint. Authorize or not the person responsible for managing and investigating the complainant. Consider taking corrective measures to repair the damage caused. For example, the entity's management may consider taking the following measures, among others, as deemed appropriate: Instruct the affected Area, make corrections to the Policies and / or Procedures violated, in order to correct them, improve them and implement mitigation and control measures to avoid new situations, according to the recommendations of the CPO. Instruct the affected Area to make modifications to the Risk Matrices, in order to incorporate, modify or eliminate controls to the activities or processes evaluated, according to the recommendations of the CPO. Evaluate reveal Investigation Report, conclusions and actions to take to the involved Management, the complainant or whoever it deems appropriate. |
| Responsible for Managing and Investigating the complaint | 13. Inform the complainant within a period not exceeding 5 business days from the date of resolution with the direct superior instance, the closure of the investigation. Regarding the conclusions and the measures taken, these will only be communicated with prior authorization from the Board of Directors and / or |

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VI. Penalties for Non-compliance

Failure to comply with the obligations established in this Procedure will be sanctioned in accordance with the provisions indicated in numeral 10 of Article 154 of the Labor Code, which are also established in the Chapters of "Obligations" and "Sanctions", of the Internal Regulations of Order, Hygiene and Safety of Camanchaca SA and its subsidiaries.

VII. Review and / or Update Frequency

This document will be valid for one year, automatically renewable unless its update is required.

VIII. Change Control Table

| Version | Modification date | Modified Aspects |
|---------|-------------------|---|
| 001 | 07-30-2017 | - Initial Version |
| 002 | 11-30-2020 | Document update (incorporation of new crimes, web reporting channel and improvements in process). |
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