

## CRIME PREVENTION MODEL

### Camanchaca S.A. and subsidiaries

Law 20,393 was enacted in December 2009, which establishes criminal liability for legal entities that commit specific crimes. This law has been amended by Law 20,931 dated July 2016, 21,121 dated November 2018, 21,132 dated January 2019, 21,227 dated April 2020 and 21,240 dated June 2020. They extend the catalogue of crimes for which a legal entity or company is liable. The crimes for which a legal entity may be liable currently are:

- Bribing a national or foreign public official (Law 20,393 - December 2009)
- Financing terrorism (Law 20,393 - December 2009)
- Money laundering (Law 20,393 - December 2009)
- Receiving stolen goods (Law 20,931 - July 2016)
- Improper negotiation (Law 21,121 - November 2018)
- Bribery between individuals (Law 21,121 - November 2018)
- Misappropriation (Law 21,121 - November 2018)
- Disloyal administration (Law 21,121 - November 2018)
- Water pollution (Law 21,132 - January 2019)
- Marketing prohibited products (Law 21,132 - January 2019)
- Illegal fishing of marine resources (Law 21,132 - January 2019)
- Preparing, processing and storing collapsed or overexploited products without testifying to their legal origin (Law 21,132 - January 2019)
- Fraud to obtain employment protection benefits (Law 21,227 - April 2020)
- Non-compliance with isolation and other measures ordered by the authority during pandemics (Law 21,240 - June 2020)

These laws establish that companies will be liable for crimes from which they directly benefit, committed by their owners, controllers, managers, senior executives, representatives, managers or supervisors, and for crimes committed by those who directly report to any of these parties, provided that the crime could be committed due to the company's failure to comply with its management duties.

The Company's management duties are considered to have been fulfilled when it has implemented an organizational, administrative and supervisory model to prevent crime prior to the commission of the offence, known as a **Crime Prevention Model (CPM)**, as defined and required by Law 20,393.

Implementing a Crime Prevention Model mitigates the Company's liability, should any of its owners, directors, executives or employees who report to them, commit any of the crimes described above.



Consequently, **Camanchaca S.A.** and each of its subsidiaries: **Salmones Camanchaca S.A., Camanchaca Pesca Sur S.A., Camanchaca Cultivos Sur S.A., Transportes Interpolar Ltda., Aéreo Interpolar Ltda., Fiordo Blanco S.A., Fiordo Azul S.A., Camanchaca SpA, Inmobiliaria Camanchaca S.A., Camanchaca Inc. (USA), and Camanchaca Ltd. (Japan)** (hereinafter "Camanchaca and its subsidiaries") have implemented a CPM, which covers policies, procedures, controls and measures that prevent the risk of crimes for which the company may be criminally liable.

Camanchaca has also incorporated into the CPM the requirement to comply with its Code of Conduct regarding fair competition, which it has implemented to prevent **conduct that breaches fair competition**, in accordance with current legislation.

The Boards of **Camanchaca S.A., Salmones Camanchaca S.A., Camanchaca Pesca Sur S.A., Camanchaca Cultivos Sur S.A., Fiordo Blanco S.A., Fiordo Azul S.A., Inmobiliaria Camanchaca S.A., Camanchaca Inc. (USA) and Camanchaca Ltd. (Japan)**, and the management of **Transportes Interpolar Ltda., Aéreo Interpolar Ltda. and Camanchaca SpA** have appointed a **Crime Prevention Officer (CPO)** in accordance with Law 20,393, who will ensure compliance with the monitoring policies and procedures within the CPM. This person has also been given the resources and authority to perform their duties.

The CPO's responsibilities include:

- Remaining independent from the organization.
- Providing training in the criminal liability of legal entities and the regulations regarding fair competition.
- Ensuring compliance with the Company's policies and procedures using audit procedures, to prevent crimes for which the company may be criminally liable or breaches of fair competition regulations.
- Reporting their performance to the Board every six months.
- Keeping the CPM and its related policies, procedures and risk matrices up to date
- Receiving, evaluating and investigating reports of potential failures to comply with the CPM or suspected crimes for which the company may be criminally liable or breaches of fair competition regulations.



The CPM is based on the **Code of Business Conduct and Ethics** that governs the behavior of Camanchaca's directors, executives and officers and their interaction as they perform their duties with third parties, as well as policies and procedures governing the Company's crime prevention measures. The procedures include:

- 1) **Prevention measures**, aimed at securing compliance with the CPM and preventing crimes for which the Company may be criminally liable, or breaches of the regulations on fair competition. This is achieved by publishing the CPM throughout the entire Company, implementing controls and preparing risk matrices.
- 2) **Detection measures**, aimed at detecting actual or potential failures to comply with the CPM, or crimes for which the Company may be criminally liable, or breaches of the regulations on fair competition, by executing compliance audits, resolving complaints, conducting investigations, and other measures within the CPO's duties.
- 3) **Response measures**, aimed at correcting situations that could result in failure to comply with the CPM, or crimes for which the Company may be criminally liable, or breaches of the regulations on fair competition, by correcting processes and monitoring controls, recording and resolving complaints, applying disciplinary procedures, and other measures.

The CPO has direct access to the Company's Board and promptly reports the measures and plans that have been implemented to fulfill their duties, together with their achievements at least twice each year.



## COMPLAINTS MECHANISMS

Finally, the CPM includes complaints mechanisms. A procedure has been developed to GUARANTEE THE CONFIDENTIALITY of the complaint and the identity of the complainant.

The complaint must include at least a detailed description of the incident, which must be associated with the crimes for which the Company may be criminally liable, or breaches of the regulations on fair competition, it must also include any available background information, and the identity of the offenders.

You are also covered by the CPM. Therefore, a complaints channel has been established to meet this requirement:

### Complaints Channel:

- [www.camanchaca.cl](http://www.camanchaca.cl)
- [www.salmonescamanchaca.cl](http://www.salmonescamanchaca.cl)

**Email:** marcelo.aguilera@camanchaca.cl

**Telephone:** +56 2 2873 2963

**Personal Interview:** With the Crime Prevention Officer.

**Certified letter addressed to:** Crime Prevention Officer, Av. El Golf 99, Floor 10, Las Condes, Santiago.



If you have any doubts or queries, please contact the Crime Prevention Officer:

**Marcelo Aguilera Contador / marcelo.aguilera@camanchaca.cl / Telephone +56 2 2873 2963**

