

Offense Prevention Policy

Law N°20,393



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1. AIM

The aim of this Offense Prevention Policy is to establish general guidelines and procedures on which Empresas Copec S.A.'s (hereinafter, "Empresas Copec" or the "Company") Offense Prevention Model is based, in accordance with the provisions of Law No. 20,393 on the Criminal Liability of Legal Entities.

2. SCOPE

The scope of this policy includes any natural person who holds and performs a role, function or position within Empresas Copec (directors, executives, representatives, workers), and any person or company that provides services managing Empresas Copec's affairs before third parties (hereinafter jointly referred to as "Members of Empresas Copec".)

3. GENERAL GUIDELINES OF THE OFFENSE PREVENTION MODEL

- 3.1. Empresas Copec shall ensure that it maintains an adequate organizational, management and supervision model for the prevention of the offenses referred to in Law No. 20,393, known as Empresas Copec Offense Prevention Model (hereinafter referred to as the "OPM".)
- 3.2. The general management of the OPM and the application of prevention activities and monitoring of the application of the OPM's own controls will be under the responsibility of a person in charge, who will have the title of Offense Prevention Officer (hereinafter referred to as the "OPO".) The OPO may designate, jointly with the Company's CEO, one or more Members of Empresas Copec to assist him/her in his/her work, especially for reporting on compliance with prevention and monitoring activities (hereinafter "Responsible Persons".)

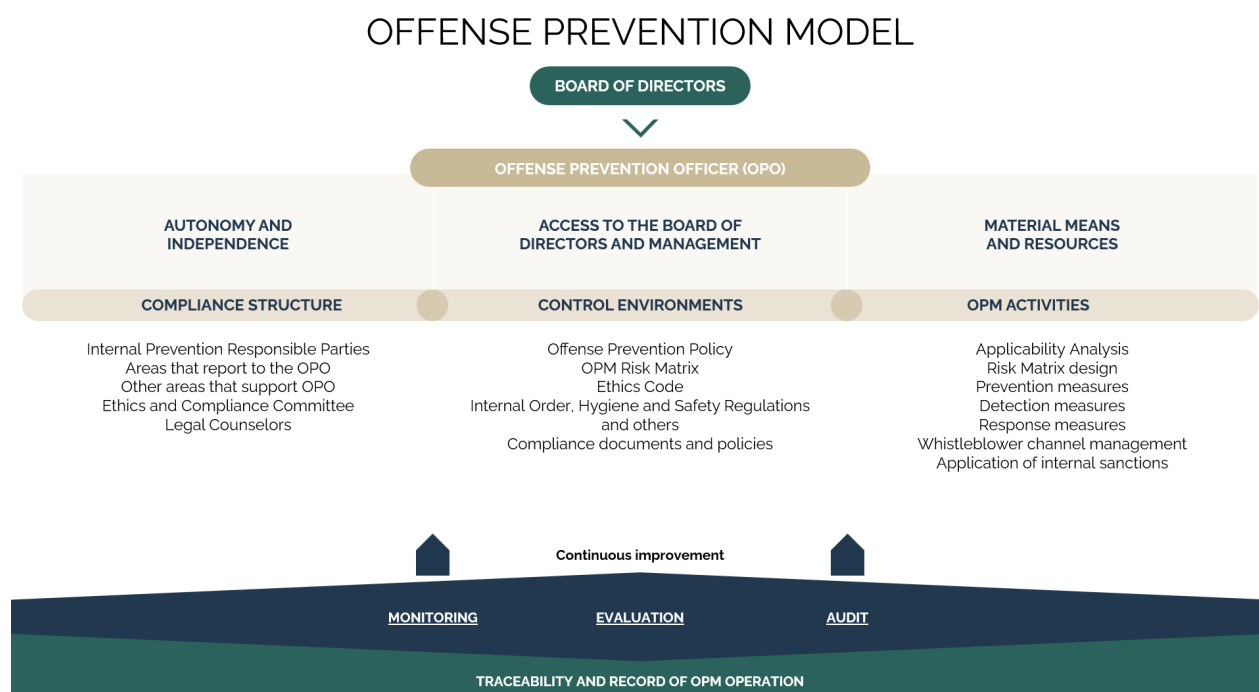
- 3.3. The OPO will have autonomy and independence regarding the Company's administration for the proper fulfillment of its functions. The Board of Directors shall provide the resources and material and non-material means necessary to adequately carry out its work.
- 3.4. Regarding the above, the Board of Directors shall annually approve OPO's budget for the fulfillment of its functions. The OPO may make free use of this budget, and must annually report on the use of these resources.
- 3.5. The OPO and his or her substitute shall be appointed by the Board of Directors of Empresas Copec (hereinafter the "Board of Directors",) for a period that may not exceed three years. The OPO and his or her substitute may be re-elected indefinitely in their functions. This appointment may be revoked at any time by the Board of Directors.
- 3.6. The OPO, together with the Company's management, shall identify the activities and/or processes carried out as part of Empresas Copec's activities, in which context there is a risk of commission of the offenses outlined in Law No. 20,393.
- 3.7. The OPO shall have direct and unrestricted access to any Company employee and information that it deems necessary for the fulfillment of its duties.
- 3.8. When deemed necessary, the OPO shall have direct and unrestricted access to the Board of Directors to inform them of what he or she deems appropriate as part of the management of the OPM and to require the adoption of measures necessary for its duties, which may go beyond the competence as OPO.
- 3.9. At least every six months, the OPO shall report to the Board of Directors on its performance, informing on the measures and plans implemented in the fulfillment of its mission.

3.10. Should the OPO or the Board of Directors deem it necessary, the OPM will be reviewed to determine whether or not it should be updated. This shall be done especially when relevant legal amendments and/or changes in business conditions occur.

3.11. The OPM shall be subject to a periodic evaluation by independent third parties, which, if appropriate, shall make recommendations for the improvement or updating of the OPM.

4. OFFENSE PREVENTION MODEL DIAGRAM

Graphical representation of the components and areas involved in the OPM.



5. OFFENSE PREVENTION PROCEDURE

5.1. Prevention Activities

The aim of these activities is to prevent the commission of the offenses outlined in Law No. 20,393, and to avoid non-compliance or breaches of the OPM.

The Company's OPM prevention activities are as follows:

5.1.1. Risk identification and analysis

The OPO is responsible for the process of identifying and analyzing legal risks for Empresas Copec regarding the offenses outlined in Law No. 20,393 and its presentation to the Board of Directors. The risk identification and analysis process must be documented in the OPM risk matrix.

5.1.2. Training and dissemination

Whenever deemed useful for the purposes of the OPM, the OPO will coordinate and/or conduct training and dissemination regarding the OPM, the most relevant offenses identified in the OPM risk matrix or on the application of preventive controls indicated in the aforementioned matrix.

A record must be kept of the training sessions that are carried out, indicating the place, day and time they were held, their content and the attendees.

5.1.3. Execution of preventive controls

Preventive controls are those established to avoid the occurrence of undesired events. In Empresas Copec's OPM risk matrix, these controls are associated with processes or activities exposed to the commission of offenses, indicating the area of the Company responsible for the application of each control activity.

5.2. Detection Activities

The aim of these activities is to carry out actions to detect non-compliance with the OPM or possible scenarios for the commission of the offenses outlined in Law No. 20,393.

The Company's OPM detection activities are as follows:

5.2.1. OPM Controls Compliance Audits

Through compliance audits, the OPO shall verify that the controls outlined in the OPM risk matrix are operating and are effective in preventing the commission of the correlative offense.

5.2.2. Review and Investigation of Complaints

The OPO, with the support of the Ethics and Compliance Committee, shall conduct an analysis and investigation of the complaints that apply to the OPM. In this regard, communications between the OPO and the members of the Ethics and Compliance Committee shall be made in writing and/or at the meetings of the aforementioned committee.

5.2.3. Execution of detection controls

Detection controls are those established to identify the occurrence of undesired events. In the OPM risk matrix, these controls are associated with processes or activities exposed to the commission of offenses, indicating the area of the Company responsible for the implementation of each control activity.

5.3. Response Activities

The aim of the response activities is to establish resolutions, notifications, disciplinary measures and/or sanctions in relation to non-compliance with the OPM. As part of the response activities, a review of the control activities related to the detected non-compliance with the OPM should be considered in order to make the necessary corrections to prevent further non-compliance.

The following are among the OPM response activities that could be applied:

5.3.1. Reporting to Justice

Upon detection of an event that could be classified as an offense, the OPO shall evaluate, together with the legal counsels and the Ethics and Compliance Committee, whether to file a report or complaint with the Public Prosecutor's Office or the police. If it is concluded that it is appropriate to file complaints, the OPO shall submit the situation to the Board of Directors, so that it may decide what it deems appropriate.

5.3.2. Sanctions and Disciplinary Measures

Sanctions and disciplinary measures may be applied in the event of a breach of the OPM by a Member of Empresas Copec, as established in the Company's Internal Regulations on Order, Hygiene and Safety.

Likewise, in the event of non-compliance with the OPM by third parties contractually bound to the Company, the sanctions stipulated in their respective contracts for such non-compliance may be applied.

5.3.3. Complaints and Sanctions Record and Follow-Up

The OPO must keep an updated record of complaints, investigations (ongoing and closed) and measures or sanctions applied in relation to non-compliance with the OPM or possible actions that may constitute an offense under Law No. 20,393.

5.4. Monitoring and Continuous Improvement

The aim of the monitoring and continuous improvement activities is to verify the proper functioning of the defined control activities and to

assess the need for improvements to the OPM.

As part of its OPM monitoring and evaluation duties, the OPO will carry out the following activities:

5.4.1. OPM monitoring

Regarding OPM monitoring, this will consist of activities carried out by the OPO regarding:

- General review of the OPM risk matrix.
- General review of the other documents that compose the OPM.
- Monitoring of the execution of the controls defined for this purpose.
- Monitoring of the implementation of the action plans of recommendations arising from the general review of the OPM risk matrix.

The results of the monitoring activities shall be reported to the Board of Directors in the respective OPO's semiannual reports. The OPO shall also report to the Ethics and Compliance Committee when required, and at least annually.

5.4.2. OPM Update

Update the OPM by carrying out a review and evaluation process (internal and/or external), according to:

- The result of the aforementioned monitoring activities.
- New regulations applicable to the OPM.
- Significant changes in the organization and/or industry in which it operates.
- Results of the evaluations carried out.

5.4.3. Legal update report

As part of the continuous improvement process, if deemed necessary, the OPO may request legal assistance for the issuance of a report on jurisprudence or other relevant legal information related to Law No. 20,393 and the OPM.

5.5. Independent Third-Party Evaluation and Audit of the OPM

Empresas Copec will submit its OPM for evaluation by an independent third party. This evaluator must be a company or person engaged in the provision of services for the review and evaluation of Offense Prevention Models.

Additionally, the Company may hire audits to the controls indicated in the OPM risk matrix, in order to review their application and operation.

6. OPM SUPPORT AREAS

The aim of the support areas is to support the OPO in the OPM's prevention, detection, response, supervision and monitoring activities.

The main support areas and their responsibilities in the operation of the OPM are detailed below:

6.1. Legal Counsels

If required, the Company's legal counsels shall provide support to the OPO in the following areas:

- Provide legal advice regarding clauses in contracts with third parties and workers or other relevant documents related to Law No. 20,393 and the OPM.
- Advise on the process of including compliance clauses (Law No. 20,393) in the Internal Regulations of Order, Hygiene and Safety.
- Advise the OPO and the Ethics and Compliance Committee, regarding investigations and analysis of complaints.
- Advise on decision making regarding sanctions and corrective actions to be implemented as a result of investigations carried out and concluded.
- Advice on updating the OPM.

6.2. Administration and Finance Management

- Provide the information required by the OPO for the performance of its duties.
- Implement and instruct the work team in the following tasks:
 - Inclusion of clauses on compliance with Law No. 20,393 in the different contracts with third parties.
 - Compliance with the periodic execution of controls related to risks and processes raised and documented in the OPM risk matrix.
 - Implementation of improvements resulting from observations identified in audits and/or periodic monitoring.
 - Support in the coordination of training and dissemination activities,

maintaining evidence of communications delivery and reporting to the OPO.

6.3. Sustainability and Corporate Affairs Department

- Provide the information required by the OPO for the performance of its duties.
- Provide the necessary information regarding Members of Empresas Copec subject to investigation.
- Implement and instruct the work team regarding the following tasks in coordination with the Administration and Finance department:
 - Inclusion of clauses on compliance with Law No. 20,393 in the different contracts with third parties.
 - Support in the coordination of training and dissemination activities, maintaining evidence of communications delivery and reporting to the OPO.

6.4. Internal Audit Unit

- Incorporate in Empresas Copec's annual audit plan the verification of compliance with the rules and operation of the controls established in the OPM.
- Provide the information required by the OPO for the performance of its duties regarding the operational functioning of the OPM.
- Support in the execution of OPM activities requested by the OPO and that are compatible with the independence of the area.

6.5. Risk Management and Internal Control Area

- Support the OPO in updating the OPM risk matrix, reporting any changes in methodology and/or risk management policy that impact the OPM risk matrix.
- Deliver information required by the OPO for the performance of its duties regarding the identification and assessment of risks.
- Manage the list verification process according to the current filter procedure.
- Develop monitoring activities regarding the execution of control activities and implementation of recommendations.

6.6. Ethics and Compliance Committee

The Ethics and Compliance Committee shall assist the OPO in the process of analysis and investigation of complaints that apply to the OPM and suggest measures that may apply, among other duties.

The functions of the Ethics and Compliance Committee are detailed in the Code of Ethics.

7. REPORTS TO THE BOARD OF DIRECTORS

The OPO will report every six months to the Board of Directors, informing them of the measures and plans implemented to fulfill its mission and to account for its management. When appropriate, the OPO's semiannual reports to the Board of Directors shall include:

1. Key OPM activities that were implemented during the reporting period.
2. Changes to the work program.
3. Changes to the Company's internal processes that impact the OPM.
4. Proposals for updates to policies and other documents.
5. Status of OPM evaluation process by independent third parties, in case such evaluation has been agreed.
6. Proposal for changes and updates to the OPM risk matrix, if applicable.
7. Other relevant topics to be defined.

In addition, the report for the second half of each year must include the work program for the following year, with its corresponding budget.

8. APPROVAL AND UPDATE RECORD

This Policy was approved by the Company's Board of Directors at a meeting held on May 31, 2018, amended at meetings held on August 29, 2019 and September 30, 2022, and replaced as agreed at the Board of Directors' meeting held on August 29, 2024.

In the preceding paragraph, note should be taken of the dates on which the Board of Directors agrees to modify or update this document, in order to have traceability of the changes it undergoes.

9. DISSEMINATION MECHANISM

The complete and updated text of this document will be available to interested parties on Empresas Copec S.A.'s webpage: www.empresascopec.cl.

