



OFFENSE PREVENTION POLICY

(CHILEAN LAW 20.393)



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OFFENSE PREVENTION POLICY



1. AIM

The aim of this document is to establish the guidelines underpinning the adoption, implementation and operation of the Offense Prevention Model of Golden Omega S.A. and its affiliates, pursuant to what is set forth in Chilean Law N° 20.393 on the Criminal Liability of Legal Entities, and the prevention of other kinds of improper conduct set forth in the laws, standards and regulations of controlling bodies, and the regulations established by the Company.

2. SCOPE

The scope of this Policy and the Offense Prevention Model ("PM") only applies to Golden Omega S.A. and its affiliates.

The scope of the Offense Prevention Policy and the related Prevention Model is corporate, i.e., it includes controllers, directors, officers, representatives, senior management, employees, contractors and consultants of Golden Omega S.A. and its affiliates.

3. PRINCIPLES AND GUIDELINES

- 3.1 Golden Omega S.A. and its affiliates will continue to permanently strive to maintain a suitable organizational, management and supervision model for the prevention of offenses set forth in Chilean Law N° 20.393 on the Criminal Liability of Legal Entities, called the "Offense Prevention Model of Golden Omega S.A. and its affiliates", through which it will foster the prevention of offenses of set forth in that law.
- 3.2 An official with the job title of Offense Prevention Officer shall apply and control the standards set out in the Offense Prevention Model of Golden Omega S.A. and its affiliates.
- 3.3 The Offense Prevention Officer shall be appointed by the Board of Directors of Golden Omega S.A. and its affiliates and ratified by the Board of each of its affiliates, and shall hold office for three years which may be extended for further three-year periods.
- 3.4 The Board of Directors, senior management and the Offense Prevention Officer of Golden Omega S.A. and its affiliates shall be jointly accountable for adopting, implementing, managing, updating and overseeing the Offense Prevention Model.
- 3.5 The Board of Directors shall provide the Offense Prevention Officer with the means and powers to undertake his functions and activities, which includes resources and materials to perform his work suitably.
- 3.6 The Offense Prevention Officer shall have access to information concerning his area of action and to

the management of Golden Omega S.A. and its affiliates, and shall have the duty of informing the Board of Directors on the management of the Offense Prevention Model at least twice a year and/or when needed.

- 3.7 The Offense Prevention Officer shall disseminate and inform the entire organization of the Offense Prevention Model, the roles and responsibilities arising from this and penalties for non-compliance.
- 3.8 Golden Omega S.A. and its affiliates shall strive to comply with all the applicable laws, standards and procedures applicable, related to the offenses set forth in Chilean Law N° 20.393.
- 3.9 The Offense Prevention Model shall be updated when there are material changes to the business conditions, for which the Offense Prevention Officer shall be accountable.
- 3.10 The Offense Prevention Model will be certified by an external organization authorized by the Chilean Commission for the Financial Market, certification that will be maintained and updated periodically, according to the provisions of the Chilean Law N°20.393.
- 3.11 The Code of Ethics of Golden Omega S.A. and its affiliates sets out the ethical standards for commercial and operational activities, promoting an environment of transparency and fair competition based on the values and principles established by the organization.

4. ROLES AND RESPONSIBILITIES

4.1 BOARD

- Approve the offense prevention policy and procedures.
- Appoint the Offense Prevention Officer and/or remove him from his position, pursuant to what is laid down in Chilean Law N° 20.393. The Board of Golden Omega S.A. and its affiliates may renew and extend such appointment every three years.
- Provide the materials and resources needed so the Offense Prevention Officer can fulfil his roles and responsibilities.
- Safeguard the correct implementation and effective operation of the Offense Prevention Model.
- Receive and assess the management and operation reports of the Prevention Model issued by the Offense Prevention Officer at least every six months.
- Receive each year the administrative



management report drawn up by the Offense Prevention Officer and approve the planning for the next period.

4.2 MANAGING DIRECTOR

- Support the Offense Prevention Officer, assuring his unrestricted access to information and people, and coordinate the activities inherent to the Offense Prevention Model in those areas required.
- Help to disseminate the Offense Prevention Model across the organization, generating the necessary dissemination and commitment proceedings to attain effective communication of the policies and procedures.
- Inform the Offense Prevention Officer of any situation observed regarding breach of Chilean Law N°20.393 and of the Offense Prevention Model measures.
- Approve the Offense Prevention Procedure.

4.3 PREVENTION OFFICER

- Carry out the role in accordance with the powers defined for the position by the Board of Golden Omega S.A. and its affiliates, as set forth in Law N° 20.393.
- Determine, jointly with the management of Golden Omega S.A. and its affiliates, the means and resources needed to be able to carry out his role and responsibilities.
- Train the employees of Golden Omega S.A. and its affiliates on issues covered by the scope of Chilean Law N° 20.393.
- Safeguard the correct establishment and operation of the Offense Prevention Model developed and put in place by Golden Omega S.A. and its affiliates.
- Report, at least half yearly and/or when needed, to the Board of Golden Omega S.A. and its affiliates.
- Report to the Ethics Committee when circumstances merit it.
- Establish and comply with the Offense Prevention Model policy and procedures and suggest, draw up and implement any other policy and/or procedure he deems necessary to complement the current Offense Prevention Model.
- Make sure the company's internal processes and activities have effective offense risk prevention controls and keep a log of compliance with and

execution of these controls.

- Make sure the company's internal processes and activities have effective offense risk prevention controls and keep a log of compliance with and execution of these controls.
- Permanently evaluate the efficacy and validity of the adopted Offense Prevention Model and its compliance with laws and other regulations, informing the Board of Directors of the need and convenience of its modification.
- Find out about and analyse any unusual or suspicious operation and, if necessary, raise the case in the Ethics Committee and/or Board, if applicable. For analysis, the Offense Prevention Officer shall gather all the documentation related to that operation, generating a case history file for such effects.
- For those cases he deems it necessary to exercise his functions, request all the information and contracts that Golden Omega S.A. and its affiliates enters into, especially with state-owned companies, and generally all the public services created by law; partnerships, public or private companies in which the State or its centralized or decentralized companies or institutions have majority capital investment or in the same proportion or, in the same conditions, representation or participation, to safeguard compliance with Law N° 20.393, the regularity of these operations, and eventually enforce the liabilities when he confirms a breach of this law or any of the offenses he is trying to prevent have been committed.
- Document and keep evidence of offense prevention activities.
- Widely collaborate with the Prevention Model certification process.
- Follow up on the recommendations or instructions which arise from the certification process or regulatory bodies.
- Make sure the offense prevention policy and procedure is updated in accordance with regulatory changes and the business environment of Golden Omega S.A. and its affiliates.
- If applicable, participate in lawsuits, charges or legal proceedings Golden Omega S.A. and its affiliates decide to file in regard to the offenses laid down in Law N° 20.393, and provide all the information he has or of which he has knowledge due to his job position.
- Undertake special tasks that the Board of Golden Omega S.A. or its affiliates entrusts him regarding



matters of his responsibility.

The responsibilities and functions set forth above shall apply to the official appointed as subrogate when, in the absence of the Offense Prevention Officer or for any other circumstance that merits it, perform the functions of the Offense Prevention Officer. Said subrogate will be proposed by the Offense Prevention Officer and ratified by the Board of Golden Omega S.A. and its affiliates.

4.4 OFFENSE PREVENTION MODEL SUPPORT AREAS

The Offense Prevention Model support areas are as follows:

- Legal advisors (External)
- Finance and Administration Management
- Internal Audit and Risk
- Ethics Committee

The controls that each support area is accountable for are outlined in the document "Offense Prevention Procedure."

4.5 OBLIGATIONS OF STAFF, CONSULTANTS AND CONTRACTORS.

- Comply with what is set out in this policy and in the Prevention Model of Golden Omega S.A. and its affiliates.
- Report, through defined channels, situations that might breach what is set forth herein.

5. DEFINITIONS

- ✓ **Code of Ethics:** the guiding document for each employee, irrespective of his or her hierarchical position. It fosters conduct based on total rectitude and honesty.
- ✓ **Offense:** unlawful acts contained in Chilean Law N° 20.393.
- ✓ **Penalty:** consequence for committing an offense of breaching the Offense Prevention Model or any of its related controls.
- ✓ **Consultants:** any person or company that facilitates or provides any kinds of professional or support services to the Company.

6. APPROVAL AND MODIFICATIONS

This policy was approved by the Company Board in a meeting held on November 5th, 2013 and modified as approved by the Company Board in a meeting held on March 6th, 2018. Should any modifications be made, the date of the Company Board meeting approving such modification shall be stated in this section.

7. EFFECTIVENESS

This document shall come into force since its day of approval and shall have indefinite duration unless the Company Board reaches another decision about it.

8. DISCLOSURE MECHANISMS

The full and updated text of this policy shall be made and kept available for interested parties on the Company website (www.goldenomega.cl).



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