



CRIME PREVENTION
PROCEDURE
(CHILEAN LAW 20,393)



goldenomega
EXPERIENCE THE DIFFERENCE



1. OBJECTIVE

Establish the procedures regarding the implementation and operation of the Crime Prevention Model, hereinafter "CPM", defined by Golden Omega, which includes a description of the activities that intervene in its operation to comply with the provisions of Chilean Law No. 20,393 on Criminal Liability of Legal Entities, as well as for the prevention of other types of improper conduct typified in laws, rules and regulations of supervisory bodies, as well as in the Code of Ethics and rules established by the Company.

2. SCOPE

The scope of this procedure and CPM includes Golden Omega S.A. and its subsidiaries (the "Company") and includes its directors, officers, senior executives, representatives, workers, contractors and advisers.

3. CRIME PREVENTION MODEL

The CPM has a monitoring process, through various control activities, on the processes or activities that are exposed to the risks of committing the crimes indicated in Law No. 20,393, as well as other types of conduct that contravene the fundamental principles of the Company.

The CPM, as established in the fourth article of Chilean Law No. 20,393, considers at least the following elements:

- Appointment of a Crime Prevention Officer (CPO).
- Definition of means and powers of the CPO.
- Establishment of a crime prevention system.
- Supervision and certification of the crime prevention system.

3.1 Diagram

In Annex 1 of this procedure, a graphic representation of the components and participating areas of the CPM is shown.

3.2 Organizational Structure

The Board of Directors, General Management, support areas and the Company's CPO will be jointly responsible for the adoption, implementation, administration, updating and supervision of the CPM, as indicated in this document.

The CPO functionally depends on the Board of Directors, which implies:

- That their appointment, ratification and revocation must be made by the Board of Directors.

- Have access to the Board of Directors to inform in a timely manner of the measures and plans implemented for the fulfillment of its mission and to render an account of its management, at least every six months.
- Direct access to relevant information.
- Autonomy with respect to the administration of the Company.
- That the Board of Directors provide sufficient resources for the operation of the CPO, considering the size and complexity of the Company.

4. CRIME PREVENTION PROCEDURE

Golden Omega's CPM includes a series of activities to prevent, detect and act against the crimes of Chilean Law 20,393, in addition to monitoring its operation.

4.1 Prevention Activities

The objective of these activities is to prevent breaches of the CPM and to prevent the commission of the crimes indicated in Chilean Law No. 20,393.

4.1.1 Training and Dissemination

The Company must carry out training regarding its CPM. The CPO, jointly with the Company's administration and finance area, must ensure:

- Train all members of the Company and keep a record of those attending training and / or evaluations if applicable. The periodicity of these trainings will be held at least annually and will consider, among other issues, the criminal liability of legal persons contained in Chilean Law No. 20,393, the CPM and all its components.
- Incorporate CPM subjects into Golden Omega Director induction programs.
- Disseminate the CPM through various channels, as appropriate:
 - Internet or corporate intranet
 - Mass emails
 - Informative meetings
 - Others

4.1.2 Risk Identification and Analysis

The CPO, together with the Company's management, is responsible for the process of identifying and analyzing risks related to the CPM of Golden Omega. The risk identification and analysis process must be documented in the Company's risk matrix. For these purposes, risks and controls will be identified, their evaluation and monitoring



will be carried out, in accordance with the provisions of the Company's Risk Management Policy.

4.1.3 Execution of Prevention Controls

Prevention controls are all those associated with areas, processes or activities with exposure to the commission of crimes documented in the CPO risk matrix. This matrix details the control activities that each area must carry out based on the risks identified, in addition to the control activities carried out by the CPO associated with each risk.

4.1.4 Review of Workers, Clients and Suppliers against Negative Lists

The Company has implemented a filtering procedure that contains activities associated with the checks of negativity lists against customer, supplier and worker databases.

4.2 **Detection Activities**

The objective of these activities is to carry out actions that detect breaches of the CPM or possible scenarios of commission of the crimes indicated in Chilean Law No. 20,393.

4.2.1 Compliance Audits of CPM Controls

Regarding the detection activity, through compliance audits, the CPO or its designee, must verify on an annual basis that the controls of the Crime Prevention Model are operating and are effective.

4.2.2 Litigation Review

If required for this purpose by the CPO, the Company's legal advisors must deliver a report to the CPO that details:

- Activities derived from audits carried out by regulatory entities, associated with the crimes of Chilean Law No. 20,393
- Lawsuits, lawsuits or any legal action involving Golden Omega, associated with crimes related to Chilean Law No. 20,393
- Fines and / or infractions carried out or in the process of review associated with the crimes related to Chilean Law No. 20,393

4.2.3 Complaint Review

The CPO, together with the Ethics Committee, must carry out an analysis of the complaints received, through the channels provided by the Company to identify those that are associated with the crimes of Chilean Law No. 20,393.

4.2.4 Coordination of Investigation

The CPO, jointly with the Ethics Committee, must coordinate the investigations derived from the complaints that are associated with the crimes of Chilean Law No. 20,393.

4.3 **Response Activities**

The objective of the response activities is to establish resolutions, disciplinary measures and / or sanctions for non-compliance with the prevention policy and this procedure, if it is legally appropriate and if there is any background that warrants it. As part of the response activities, a review of the violated control activities should be considered, in order to strengthen or replace them with new control activities.

4.3.1 Complaints to Justice

Before the detection of a fact that can be classified as a crime, the CPO must evaluate, in conjunction with the legal advisers and the Ethics Committee, if it corresponds and carry out complaint actions before the Courts of Justice, Public Ministry or Police.

4.3.2 Disciplinary Sanctions

The Company may apply disciplinary measures for non-compliance with crime prevention policies and procedures, if legally appropriate.

4.3.3 Registration and Follow-up of Complaints

The CPO must maintain an updated record of complaints, investigations (ongoing and closed) and measures applied, in relation to the breach of the CPM or any actions that could constitute a crime (Chilean Law No. 20,393). In addition, it must follow up on the complaints that are related to the crimes of Chilean Law No. 20,393.

4.3.4 Communication of Sanctions and Improvement of Control Activities

- The CPO, jointly with the Ethics Committee, must resolve the convenience of communicating disciplinary measures to all those who are part of the Company, in order to disseminate to the workers and third parties involved its firm commitment to safeguard the declared ethical principles and values.
- Review the violated control activities, in order to apply improvements in their design or design new control activities.
- The CPO must evaluate the risks and control activities violated in each of the resolved cases, to determine the need to establish, together with the Company's administration, new control activities



or improvements in control activities that do not operate effectively or whose design is not adequate.

- The CPO is responsible for advising the areas involved in the definition and implementation of the corrective measures adopted and the areas in adopting and executing them.

4.4 Supervision and Monitoring

The objective of supervision and monitoring is to verify the proper functioning of the defined control activities and evaluate the need to make improvements to the CPO.

4.4.1 CPM Monitoring

It consists of activities to be carried out by the CPO or whoever it requests support, regarding:

- Periodic monitoring of the execution of a sample of the controls reflected in their respective risk matrix.
- Monitoring of the implementation of action plans and recommendations arising from the analysis of the risk matrix.

The results of the monitoring activities will be communicated to the Board of Directors in the respective semi-annual reports of the CPO.

4.4.2 Updating the CPM

Update the CPM by conducting the annual evaluation process of its design and operational effectiveness, in accordance with:

- New regulations applicable to the CPM.
- Significant changes in the organization and / or industry in which it is inserted.
- Result of the audits carried out.

Based on the information obtained, the CPO must propose to update the risk matrix of the CPM and existing controls in the organization, as well as the corresponding policies and procedures, as appropriate.

4.5 Certification of the CPM

The CPM may be certified when the Company deems it appropriate, in accordance with what is suggested by Chilean Law No. 20,393.

The CPO is responsible for coordinating the certification process and the delivery of information requested by the company in charge with the support areas.

5. CPO WORK PLAN

Starting from the annual exercise of identification, updating and evaluation of the risks of committing crimes, the CPO must update its work plan. The work plan is developed through the following activities:

- Review and propose the update of the CPM risk matrix.
- Determine monitoring activities for the risks and controls identified.
- Document monitoring activities in a work plan.
- Schedule training and dissemination activities together with those responsible for human resources or whoever the administration decides.
- Carry out activities to improve the CPM that it is deemed convenient to implement.

6. AREAS OF SUPPORT TO THE CPM

The objective of the support areas is to provide support to the CPO in the prevention, detection, response, supervision and monitoring activities that make up the CPM. The main areas of support and the activities that they will execute based on the operation of the CPM are detailed below.

6.1 Legal Advisors

The external legal advisors of the company, if required for such purposes, must provide their support to the CPO in the following areas:

- Advise in the legal field regarding clauses in contracts with third parties and workers or other relevant documents related to Chilean Law No. 20,393 and the CPM.
- Advise on the process of including compliance clauses (Chilean Law No. 20,393) in employment contracts.
- Deliver reports related to lawsuits and / or lawsuits brought by that are related to the crimes indicated in Chilean Law No. 20,393.
- Deliver reports on the review of fines applied to the Company by regulatory entities, in order to detect cases that affect compliance with Chilean Law No. 20,393.
- Advise the CPO and the Ethics Committee, in relation to investigations and analysis of complaints.
- Advise on decision-making in relation to sanctions and corrective actions to be implemented as a result of the investigations carried out and concluded.



6.2 Finance and Administration Manager

- Deliver the necessary information regarding employees subject to investigation.
- Deliver the information required by the CPO for the performance of its functions in relation to the implementation, operation and effectiveness of the CPM.
- Implement the following tasks:
 - Inclusion of compliance clauses with Chilean Law No. 20,393 in the various contracts with third parties.
 - Compliance with the periodic execution of the controls related to the risks and processes raised and documented in the risk matrix of the CPM.
 - Implementation of improvements resulting from observations identified in audits and / or periodic monitoring.
 - Support the list verification process according to the current filter procedure.
 - Advise on decision-making in relation to sanctions and actions to follow as a result of the investigations carried out.
- Support in the coordination of the dissemination activities of the Crime Prevention Model in the Company carried out by the CPO:
 - Effective communication of the prevention policy and procedure. Said communication must involve all levels of the organization, including the Board of Directors and senior management. Evidence of the delivery of communications to workers in compliance with this activity must be kept.
 - Periodic training regarding the CPM and the crimes indicated in Chilean Law No. 20,393. A record of those attending the trainings must be kept; this information must be reported to the CPO. Updating of information by the available communication media regarding the CPM.

6.3 Internal Audit and Risk

- Incorporate the review of the Golden Omega CPM in the annual audit plan.
- Deliver the information required by the CPO for the performance of its functions in relation to the operational functioning of the CPM.
- Support in the execution of CPM activities that the CPO requests and that are compatible with the independence of the area.

- Carry out internal investigations as requested by the CPO, according to the type of complaint received and in accordance with the provisions of the Ethics Committee.
- Update and review the risk matrix together with the CPO and the support areas, reporting any change in methodology and / or the risk management policy that impacts the CPM matrix.
- Deliver the information required by the CPO for the performance of its functions, in relation to the identification and evaluation of risks.

6.4 Ethics Committee

The Ethics Committee, appointed by the Board of Directors, advises the latter on matters of ethics and conduct in the Company. Among its functions, detailed in said document, is to facilitate and assist the CPO in the development, implementation and effective operation of the CPM. For these purposes, the CPO must inform the Ethics Committee of all matters that could be within its competence.

7. CONTROL ENVIRONMENT

The control environment is the basis of the CPM, since it provides the fundamental guidelines regarding its structure and operation. The CPM control environment consists of, but is not limited to, the following documents:

- Risk Management Policy.
- Code of Ethics.
- Crime Prevention Policy.

8. CERTIFICATION

The Company may choose to certify the adoption and implementation of the CPM by a company registered and authorized by the Chilean Financial Market Commission for this function. The subsequent certification / or recertifications agreed by the Company, may be carried out on a regular basis according to the term of validity established in the respective certificate.

9. REPORTS AND COMPLAINTS

The CPO will report every six months to the Board, reporting the measures and plans implemented in the fulfillment of its mission and rendering an account of its management. The reports to be reported to the Board of Directors will cover the following matters:



- Important milestones: activities related to the CPM that were executed in the period.
- Changes to the work program.
- Changes to internal processes of the Company in processes that impact the CPM.
- Updating of policies and other documents.
- Status of the certification process, if such certification has been agreed.
- Risk management of the CPM: Proposal of changes and updates to the risk matrix of the CPM, if applicable.
- Other relevant topics to be defined.

Additionally, the report includes the work program for the following period (next semester), indicating the activities and the committed dates.

10. COMPLAINTS PROCEDURE

Golden Omega has implemented a confidential communication channel, so that everyone can report directly to the CPO about a practice that in their opinion constitutes a violation of Chilean Law No. 20,393 or a conduct that deviates from the ethical principles established in the Code of Ethics, by people of the Company, or by entities or people that have relationships with it. A summary or abbreviated complaint procedure, of public access, has been provided on the Company's website, which allows a simple understanding of how to make a complaint and in general terms what the process consists of.

The CPO will be responsible for receiving the complaints that are presented by the channel mentioned above.

Once the complaint is received, the CPO will inform the complainant, if possible, giving an account of the receipt of the complaint. The CPO will analyze the information of the received complaint and if it is necessary to have more information, it may request it from the complainant, if it is possible to do so.

Subsequently, the CPO will inform the Ethics Committee about the complaint received.

The Ethics Committee will analyze the complaint and, if there is sufficient information on a conduct that eventually constitutes an infringement of Chilean Law No. 20,393 or deviates from the ethical principles established in the Code of Ethics, by people of the Company, or by entities or persons that maintain a commercial relationship with it, may order an investigation to be carried out to clarify the facts. The Ethics Committee will evaluate whether the complaint is referred to the person in charge of personnel or whoever said committee designates for its respective analysis and investigation and / or its complaint to the

courts, if appropriate. The Ethics Committee may also carry out other procedures to clarify the facts, if it deems it appropriate.

The procedure will be confidential as necessary and an attempt will be made to ensure the rights of those investigated.

In the event that the Ethics Committee deems it necessary, the Board will be informed and communicated immediately in order to be able to take the actions deemed appropriate.

The Ethics Committee may issue a written report on the investigation and its recommendations to the Board of Directors or the Company's management.

In the event that a complaint is directed to any member of said committee, the CPO will proceed to inform the remaining members of the committee and request an extraordinary meeting to define actions in this regard.

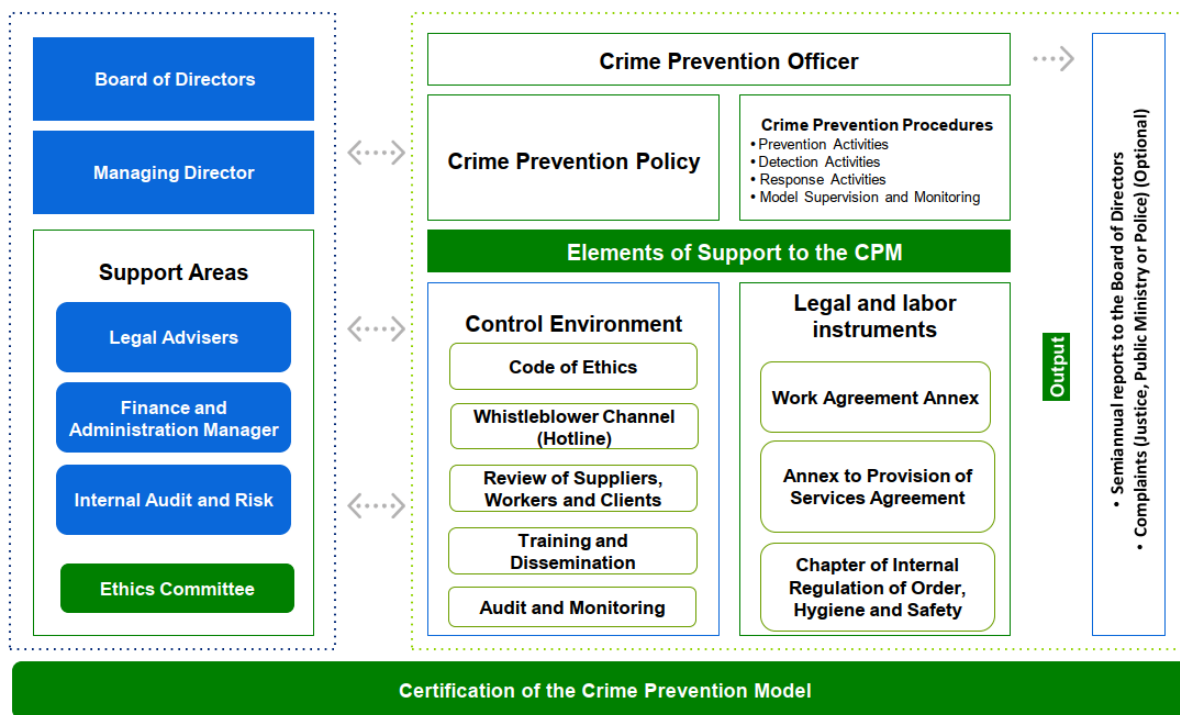
Once the process is finished, if the Ethics Committee deems it necessary, it will ask the CPO to inform the complainant of the final conclusions of the case, and then proceed to close the complaint.

11. APPROVAL AND VALIDITY

This document was approved by the Management Director of the Company on November 5, 2019, governs immediately and will have an indefinite duration as long as the Managing Director does not adopt another resolution in this regard.



Annex 1. Components and participating areas of the CPM





WWW.GOLDENOMEGA.CL

+56 67 2589110. • AV. COMANDANTE SAN MARTÍN 3460, ARICA, CHILE.