



goldenomega®

EXPERIENCE THE DIFFERENCE

Code of Ethics

Principles and Values

Table of Contents

Message from the General Manager	04
Our Purpose	05
Our Commitment	07
1 Application and Scope of the Code	08
1.1 Definitions and Essential concepts	08
1.2 Scope of Application of the Code of Ethics	10
1.3 Updating the Code of Ethics	10
1.4 Interpretation of this Code	10
2 Fundamental Principles of Conduct	11
2.1 Essential Preliminary Considerations	11
2.2 Proper Conduct and Personal Integrity	11
2.3 Sustainability	11
2.4 Workplace Environment and Safety	12
2.5 Respect and Non-Discrimination	12
2.6 Respect for Free Competition	12
2.7 Representation of the Company	12
2.8 Conflicts of Interest	12
2.9 Protection of Company Assets and Resources	13
2.10 Integrity and Corporate Gifts	14
2.11 Relationship with Suppliers and Contractors	14
2.12 Relationship with Clients	15
2.13 Offences Specified in Law No. 20.393	15
2.14 Information Management	15
2.15 Industrial and Intellectual Property	16
3 Organisational Structure	17
3.1 Ethics Committee	17
3.2 Crime Prevention Officer	17
3.3 Compliance and Risk Committee	17
4 Updating and Approval	18
5 Final Chapter	19



To All Our Employees

Definitions and Essential Concepts

The Board of Directors of our Company has decided to formally establish the principles and behaviours that have shaped our journey, always guided by ethical standards, personal integrity, and respect for established regulations. These principles are significant and have served as foundational pillars of our Company, based on the values of austerity, honesty, quality workmanship, and the importance of keeping one's word.

With this purpose, this document—"Code of Ethics: Principles and Values"—has been issued, outlining the guiding principles and policies that should inform the conduct of every individual who is part of this Company.

I would like to highlight that we all must observe this Code of Ethics, not only to ensure that the activities we conduct strictly comply with applicable laws and other relevant regulations, but also as a means to achieve high standards of corporate social

responsibility, transparency, and mutual respect. All of this will inevitably lead to a company that is more highly valued, safer, more productive, more responsible, and more welcoming for everyone.

I kindly request that, after reading this document, you indicate your agreement and commitment by electronically signing the form at the end of this document.
Yours sincerely,

THE GENERAL MANAGER

Our Purpose

To contribute to people’s health by leading the global Omega-3 market in quality and innovative solutions, through the sustainable and safe operation of our facilities, with respect for the environment and the communities in which we operate, while delivering appropriate returns for our shareholders.





Our Commitment

- **To contribute** to society by creating the greatest possible value that sustainably benefits our shareholders, employees, suppliers, clients, and the communities in which we operate, through efficient, responsible, innovative, and high-quality management across all our processes.
- **To promote** the sustainable use of natural resources in our surroundings, investing in research, innovation, technology, and training to progressively, continuously, and systematically prevent and reduce the environmental impact of our activities, products, and services.
- **To deliver** high-quality products to all our clients on an ongoing basis, encouraging our suppliers to become active participants in our value and quality chain.
- **To safeguard** occupational health and safety for both our employees and those of our partner companies, while continuously and progressively reducing the risk associated with our operations and services.
- **To foster** the development of all members of the Company, promoting a workplace environment based on respect, honesty, professional excellence, training, and teamwork.
- **To build** lasting and mutually beneficial relationships with the communities where we operate, supporting their development.
- **To maintain** transparent and honest communication with all stakeholders relevant to our Company.
- **To comply** with applicable laws and all other commitments governing our business and, where possible, to positively exceed established standards.
- **To implement** and apply systems and procedures that enable us to manage business risks effectively, regularly evaluating our performance across all processes and promptly adopting corrective measures when necessary.
- **To communicate**, train, and engage our employees, contractors, and suppliers in the fulfilment of these commitments, ensuring that this policy is implemented through the collaboration and effort of all.



1 Application and Scope of the Code

1.1 Definitions and Essential Concepts

Golden Omega: Refers to the company named Golden Omega S.A., hereinafter also referred to as the "Company."

Code: This is the Code of Ethics of Golden Omega.

Board of Directors: The body responsible for the administration of Golden Omega.

Ethics Committee: A body appointed by the Board of Directors, tasked—together with the Crime Prevention Officer—with ensuring compliance with the standards of conduct set out in this document and handling reports related to the Crime Prevention Model submitted via the Whistleblowing Channel.

This body is composed of three members: the Company's General Manager, the Secretary of the Board, and one Director of the Company. The Board must appoint the Director to be part of this committee and must serve until removed by resolution of the Board.

Further functions of the Ethics Committee are detailed in the chapter entitled "Key Bodies and Their Functions" of this code.

Crime Prevention Model: The Crime Prevention Model of Golden Omega (hereinafter also referred to as the "CPM") is a set of tools, procedures, and control activities over the Company's processes, designed to prevent the commission of the offences referred to in Article 1 of Law No. 20.393, and to ensure compliance with the Code of Ethics.

The main components of the CPM are:

- 1° Identification of activities or processes within the legal entity that carry a risk of criminal conduct.
- 2° Establishment of protocols and procedures to prevent and detect criminal conduct in the context of the Company's activities, including internal sanctions in cases of non-compliance.
- 3° Appointment of a Crime Prevention Officer, whose responsibilities include the overall management of the CPM and the implementation and enforcement of the aforementioned protocols and procedures.

4° Availability of secure and confidential reporting channels through which any individual may report incidents or situations that may constitute the commission of offences under Law No. 20.393, or breaches of this Code of Ethics.

5° Provision for regular evaluations by independent third parties, and mechanisms for improvement or updates based on the results of such assessments.

Crime Prevention Officer: The person appointed by the Board of Directors who is responsible for the overall management of the CPM and for the implementation and enforcement of the protocols and procedures established therein. The Crime Prevention Officer (hereinafter also the "CPO") must possess appropriate independence, effective powers of direction and oversight, and direct access to Company management to provide timely reports on the measures and plans implemented, to account for their actions, and to request the adoption of further measures required for their role, even if such measures exceed their authority.

Golden Omega must provide the CPO with the necessary material and non-material resources to properly carry out their duties.

Whistleblowing Channel: A confidential channel for submitting reports, allowing any person to inform the Crime Prevention Officer of unlawful acts or breaches of the Code of Ethics or the Crime Prevention Model of Golden Omega, committed either by members of Golden Omega or by third parties connected to Golden Omega in the course of its business.

The responsible reporting of actions that breach this Code of Ethics should be regarded as a contribution maintaining a high ethical standard within the Company. Under no circumstances shall it be subject to retaliation or negative consequences for those who deem it necessary to make such reports.

This channel may also be used to submit queries to the Crime Prevention Officer for clarification on any doubts regarding the legality or ethical nature of acts or situations arising in the context of Golden Omega's business activities.

Access to this channel is available on Golden Omega's website: goldenomega.eticaenlinea.cl

Compliance Management Policy: A corporate policy based on two fundamental pillars: (i) Regulatory Compliance, and (ii) Ethics and the Crime Prevention Model, to foster a compliance-driven culture throughout the organisation.

Integrity: A core value that entails not only adhering to applicable laws and regulations but also acting according to the highest standards of responsibility, transparency, respect, fairness, honour, honesty, and consistency.

Compliance: A management system designed to ensure compliance with the legal regulatory obligations applicable to Golden Omega, as well as with all other internal standards, rules, policies, or procedures that reflect the industry's best practices, corporate governance standards, ethical norms, and stakeholder expectations. Compliance reflects ethical conduct in business activities.

Compliance and Risk Manager: The individual responsible for preventing, detecting, and monitoring the Company's risks, contributing to the promotion and development of a culture based on best practices in corporate governance, management of cross-functional

or operational risk, and the promotion of ethical and regulatory-compliant behaviour throughout the organisation.

Members of Golden Omega: Refers to the directors, executives, and employees of Golden Omega.

Internal Rules on Order, Hygiene, and Safety: This document outlines the requirements, obligations, prohibitions, and sanctions applicable to all executives and employees of Golden Omega regarding their duties and presence within the Company. It also includes procedures for reporting, investigating, and resolving situations involving workplace harassment, sexual harassment, and violence at work.





1.2 Scope of Application of the Code of Ethics

This Code of Ethics sets out the values and principles to which all Members of Golden Omega must adhere in their conduct.

The provisions of this Code also apply to any person providing services to Golden Omega by managing its affairs before third parties, whether or not acting as its representative, in the context of the services rendered to the Company.

This Code is not intended to cover every possible situation that may arise in the course of Golden Omega’s activities. It is also not a comprehensive summary of all laws and regulations applicable to the Company. Therefore, it does not replace or override other internal policies and/or procedures but rather complements them.

It is the responsibility of all Members of the Company and its subsidiaries to be fully aware of, comply with, and enforce the provisions of this Code.

The contents of this Code must be observed without exception.

1.3 Updating the Code of Ethics

The Board of Directors is responsible for drafting and updating this Code. Additionally, the Ethics Committee and the Crime Prevention Officer may propose to the Board any updates or amendments to the Code that they consider appropriate or necessary.

1.4 Interpretation of this Code

When interpreting the provisions of this Code, Members of Golden Omega must adhere to the plain and natural meaning of its wording.

The Company may, whenever it deems it necessary and under specific circumstances, establish stricter conduct requirements for its personnel. Such requirements will always be communicated through formal channels.

> Any queries or doubts regarding the interpretation of this Code must be referred to the relevant line manager, the Compliance and Risk Manager, or the Crime Prevention Officer via the Whistleblowing Channel.

2 Fundamental Principles of Conduct

All Members of Golden Omega must conduct themselves in accordance with the principles and rules outlined below:

2.1 Essential Preliminary Considerations

Members of Golden Omega must always act in compliance with the applicable legal framework.

Any conduct that breaches applicable laws or the provisions of this Code is neither justifiable nor tolerated by the Company, even if such conduct is intended to benefit Golden Omega.

It is the responsibility of both Golden Omega and all its Members to engage in and support the dissemination of and training in the fundamental principles set forth herein, ensuring that this Code is implemented through the collaboration and effort of all.

2.2 Proper Conduct and Personal Integrity

SGolden Omega expects its Members to uphold strong ethical and behavioural standards in all their actions, not only in the context of their professional duties but also in their personal lives.

The Company expects its personnel to act honestly and responsibly in all aspects of daily conduct. This behaviour must prevail under all circumstances.

All relationships between Members of Golden Omega—and between them and third parties (clients, suppliers, among others)—must be conducted with mutual respect, excluding any form of undue pressure, mistreatment, threats, extortion, or violence. Under no circumstances may a third party be coerced, intimidated, or misled into signing documents with the Company, nor may contracts be entered into that substantially misrepresent the true nature of the transaction (simulated contracts). All contract negotiations must be based on respectful dealings and the sharing of truthful information with the counterparty.

No Member of Golden Omega may request or suggest that another colleague engage in improper conduct, violate applicable laws, or act against the behavioural rules outlined in this Code. Any individual who believes

they are being pressured to act improperly, must immediately use the Whistleblowing Channel to report the situation for investigation and appropriate resolution.

Furthermore, any improper conduct under this Code is not justifiable, even if intended to result in a benefit for the Company.

2.3 Sustainability

Golden Omega and its Members are committed to sustainably conducting business, thereby ensuring the Company’s long-term viability.

To this end, Golden Omega and its Members must ensure that the principles of transparency, accountability, and sound governance are upheld in all processes and activities undertaken within the Company.

Likewise, every Member of the Company must safeguard its economic viability from a long-term perspective, ensuring that financial incentives within Golden Omega are well-structured to prevent any conflict between the short-term interests of its Members and the long-term interests of the Company.

Members of Golden Omega must adopt an approach in their day-to-day actions that is compatible with environmental protection and conservation and must comply with both applicable legislation and the Company’s internal environmental policies.

2.4 Workplace Environment and Occupational Safety

It is the responsibility of all Members of Golden Omega to maintain a safe and healthy working environment, free from violence and harassment, and grounded in respect, responsibility, and honesty.

Members of Golden Omega must cooperate with the implementation and management of systems and procedures that enable the Company to manage its legal and operational business risks.

It is the responsibility of everyone to ensure the occupational health and safety of Golden Omega's members, those working for its partner companies, and individuals present on its premises or who may be affected by its activities.

2.5 Respect and Non-Discrimination

Every Member of Golden Omega must respect the dignity of others, rejecting discriminatory behaviour based on distinctions, exclusions or preferences rooted in race, colour, sex, gender, maternity, breastfeeding, age, marital status, union affiliation, religion, political opinion, nationality, national descent, socioeconomic status, language, beliefs, participation in trade unions, sexual orientation, gender identity, parentage, personal appearance, illness or disability, or social origin, where such distinctions have the purposes or effect of nullifying or impairing equality of opportunity of fair and equal treatment in employment and occupation.

> It is the responsibility of all Members of Golden Omega to report any situation that contravenes the above.

Any Member of Golden Omega who believes they are a victim of discrimination or any form of harassment, must follow the steps outlined in this Protocol for the Prevention of Workplace Harassment, Sexual Harassment and Violence at Work, which is included in the Internal Regulations on Order, Hygiene and Safety, and may use the Whistleblowing Channel to submit relevant reports.

Golden Omega rejects and will not tolerate under any circumstances workplace or sexual harassment, nor any pressure placed on affected individuals to prevent them from reporting such incidents.

2.6 Respect for Free Competition

Golden Omega promotes and respects free competition, a fundamental value that underpins every aspect of its economic activity. Competition encourages efficiency and innovation, enabling the Company to build fair and equitable commercial relationships.

Competitive conduct must be governed by the Company's business objectives and by market considerations, always in strict compliance with applicable legislation.

Under no circumstances may Members negotiate or attempt to reach agreements that restrict free trade or free competition. In the event of any doubt, Members of Golden Omega must consult their respective line managers before preparing or signing agreements or contracts or undertaking actions that could potentially infringe on competition or antitrust laws or regulations.

2.7 Representation of the Company

When making statements regarding Golden Omega to the media, the public, or private entities, Members of Golden Omega must always speak the truth. The content of such statements must relate to matters of which they have direct knowledge and about which they have no reason to doubt the accuracy.

Members of Golden Omega may only act on behalf of the Company in situations where they have been granted the power or authorisation to do so—either by their position, by formal delegation, or by express mandate. They are therefore prohibited from representing the Company in any circumstance where such authority has not been granted.

Members must take special care to make it clear that they are acting in a personal capacity when their actions could be confused with Company representation. Examples include (but are not limited to) supporting political campaigns, making statements to public media, participating in social or community organisations, making donations, signing petitions to authorities, or issuing public declarations.

Social media profiles, instant messaging apps, stationery, business cards or stamps bearing Golden Omega's name must comply with Company branding guidelines and authorisations and may only be used for matters directly related to the Company's business activities—never for personal communications.

2.8 Conflicts of Interest

A conflict of interest arises when Members of Golden Omega, in a position to influence Company policies or decisions directly or indirectly, have a personal interest in any negotiation, action, contract, operation or transaction involving Golden Omega.

This also extends to spouses, civil partners, or relatives up to the second degree of consanguinity or affinity (including children, parents, siblings, uncles/aunts, grandparents, grandchildren, and nephews/nieces) of the Members of Golden Omega.

In the event of a conflict of interest, the Member of Golden Omega involved must refrain from participating in any decision related to the matter and must report the conflict to their immediate supervisor. This ensures that any decisions regarding the business or transaction are made by individuals who are not affected by such a conflict, in accordance with applicable law and the Company's internal regulations.

It is the responsibility of each Member of the Company to be fully informed about, and to disclose, any potential conflicts of interest to Golden Omega by consulting their direct supervisor or, failing that, the appropriate person as determined by Golden Omega's internal policies or current regulations.

2.9 Protection of Company Assets and Resources

Members of Golden Omega must take proper care of the Company's assets and resources. The use of such assets must always be aligned with the performance of each Member's duties within the scope of the Company's activities.

This also applies to third-party property located on Company premises, as well as assets made available to Members by Golden Omega (e.g. vehicles).

Efforts must be made to ensure that the wear and tear of Golden Omega's assets does not exceed what would be considered reasonable through appropriate use. It is not permitted to lend or transfer assets to third parties without the prior authorisation of the relevant supervisor. Members of Golden Omega are also responsible for maintaining the confidentiality of any Company information in their possession, ensuring that documents and files are safeguarded from unauthorised access.

Company knowledge must not be disclosed to third parties, particularly where such disclosure could cause harm to Golden Omega. This obligation also applies to third-party knowledge to which Members have had legitimate access but are bound to keep confidential.

Ownership of procedures and ideas generated by individuals in the course of their remunerated duties for Golden Omega belongs to the Company. The unauthorised use of such intangible assets, even by those who created them, is strictly prohibited.

> Members of Golden Omega are not permitted to use Company assets or resources for personal purposes, occasions, or interests.





2.10 Integrity and Corporate Gifts

The Company expressly rejects and prohibits any act or omission by its Members that could be considered bribery of public officials (whether national or foreign), a crime that may occur without the need for any reciprocal benefit from the public official. Members of Golden Omega must exercise special care in their interactions and communications with public officials to avoid engaging in such conduct and must steer clear of any situation or act that could potentially compromise the official's independence or impartiality.

In line with the above, under no circumstances should Members of Golden Omega accept, receive, give, offer, or agree to give gifts or any other type of financial or non-financial benefit to national or foreign public officials about their role, for their gain, or for that of any related third parties.

Exceptionally, low-value gifts may be accepted, offered, or given when they are customary and recognised as gestures of courtesy and good manners, provided that such acts could in no way be interpreted as an attempt to influence the independence, impartiality, or judgement of third parties or a Member of Golden Omega.

Similarly, in the context of clients, suppliers, or other private parties with whom Golden Omega engages, gifts may be accepted or offered when such actions are clearly understood as gestures of goodwill or marketing initiatives—provided again that they cannot reasonably be interpreted as attempts to influence the independence, impartiality, or judgement of third parties or a Member of Golden Omega. Any gifts given to suppliers, clients, or other external parties must appropriately represent Golden Omega's corporate image.

Care must be taken when extending invitations to dinners or events related to business matters to ensure such invitations cannot be interpreted as commitments, undue influence, or, due to their nature, character, or frequency, as deliberate attempts to affect the independence, impartiality, or judgment of others.

If a Member of Golden Omega is invited to a dinner, event, or trip, they must ensure that their independence is not compromised, nor can it reasonably be perceived as compromised, concerning those issuing the invitation. Where attendance involves travel or accommodation, such expenses must be covered by Golden Omega.

In case of doubt regarding these matters, Members should consult their immediate supervisor, the Compliance and Risk Manager, or the Crime Prevention Officer through the Whistleblowing Channel.

2.11 Relations with Suppliers and Contractors

The relationship between Members of Golden Omega and its suppliers or contractors must be based on strict independence and must reflect the best interests of Golden Omega. This means avoiding any undue commitment or bias in favour of a supplier or contractor, and always prioritising criteria such as utility, quality, timeliness, and budget, thereby serving the Company's best interests. Under no circumstances should one supplier be favoured over another in exchange for any benefit.

The selection and hiring of suppliers and contractors must always be based on economic, technical, professional, and ethical criteria, as well as the specific needs of Golden Omega. Proposals should be evaluated based on objective factors, including competence, timeliness, price, and quality. Selection procedures must be transparent, established before engagement, and demonstrable if required.

Likewise, every Member of Golden Omega must take care of and return, within the agreed timeframe, any third-party property held by the Company (under lease, rental, or similar contractual arrangements). Under no circumstances may such property be withheld beyond the agreed term as a means of exerting pressure to secure payment of any obligations owed by the owner to Golden Omega.

➤ Business dealings should be avoided with companies or individuals for whom there exists reasonable doubt regarding their integrity or ethical standards.

2.12 Relationship with Clients

Golden Omega's commitment to client satisfaction must be reflected in respect for their rights and the ongoing pursuit of solutions that meet their needs, always in alignment with the Company's development and profitability objectives.

It is considered improper conduct to offer financial benefits—either directly or indirectly—to public officials, clients, client representatives, or individuals of influence within client organisations, in exchange for favours relating to contracts, services, tenders, or sales of any kind.

To maintain the highest level of trust with our clients, the Company adheres to a strict policy of treating all commercial and business information obtained through business relationships as the confidential property of the client. The Company shall not disclose any such information or the outcomes of business dealings without the client's consent, except in cases where disclosure is requested by the client or legally mandated. This commitment remains in force even after the termination of the commercial or employment relationship.

2.13 Offences Specified in Law No. 20.393

By Law No. 20.393, Golden Omega may be held criminally liable for any offence set out in that law, if committed in the course of its business activities by, or with the involvement of, any individual holding a position, function, or role within the company, or by a person or entity

providing services on its behalf in dealings with third parties, whether or not acting under formal representation.

It is expressly stated that Members of Golden Omega are strictly prohibited from engaging in any criminal conduct covered under Law No. 20.393.

The Crime Prevention Officer may be contacted at any time via the Whistleblowing Channel for further guidance regarding specific situations that may carry risks related to the offences outlined in the law. Likewise, if a Member becomes aware of a problem that may constitute one of the offences specified in Law No. 20.393, they must report the matter to the Crime Prevention Officer through the Whistleblowing Channel.

To help prevent the commission of such offences, Golden Omega has developed a Crime Prevention Policy, which sets out the core principles and components of the Company's Crime Prevention Model. This policy is publicly available on Golden Omega's website: www.goldenomega.cl/es/nosotros/gobierno-corporativo/

2.14 Information Management

It is expressly prohibited for Members of Golden Omega to engage in transactions involving publicly offered securities in respect of which they possess information that has not yet been disclosed to the market (such as business plans, trade secrets, financial data, etc.). While in possession of such information, it is also forbidden to advise third parties to carry out transactions or to disclose such information inappropriately, regardless of the reason.

Information relating to Golden Omega's operations and those of its clients is confidential and must not be disclosed. The same applies to any information received from third parties under a confidentiality agreement.

Accordingly, it is the responsibility of every Member of Golden Omega to safeguard all documents and information to which they have access because of their work at the Company. If it is necessary to disclose any confidential information for commercial reasons, the Member must first obtain express authorisation from the relevant management.

Members of Golden Omega are responsible for maintaining the confidentiality of the Company's information and for diligently protecting documents and files from access by unauthorised third parties.

Golden Omega treats all commercial and business information obtained through its business relationships as confidential. The Company shall not disclose such information or business outcomes without the consent of

the other parties involved, except where such disclosure is required by legal or judicial mandate.

It is not permitted to remove or extract documents or information from Golden Omega’s offices, premises, or equipment—even by the person who created or produced such information—without prior authorisation and only when necessary to perform their duties within Golden Omega. This applies especially to information stored on computers and electronic devices intended for work use.

> **Members of Golden Omega shall strive to accurately, truthfully, and promptly represent the Company’s financial and legal position to the market, its auditors, and shareholders.**

The Company’s accounting and legal records, as well as operational registers and any other information concerning its management, must be reliable and must comply, both in form and substance, with current accounting standards and legal requirements.

All information provided by Members of Golden Omega to their superiors, internal and external auditors, or in response to requests from other institutions or entities (public or private) must be provided in good faith and to the best of their knowledge. It must be timely, accurate, and reliable.

In no case shall Members of Golden Omega conceal information or provide inaccurate, false, or incomplete data in any interaction with third parties in the course of their duties and in compliance with this Code.

If there are any doubts regarding the truthfulness, legitimacy, or integrity of a document or any other medium containing information about Golden Omega, Members must report the matter to the Company’s Legal Advisors or the Crime Prevention Officer via the Whistleblowing Channel. In such cases, the information may not be used without the prior approval of the Legal Advisors or the Crime Prevention Officer.

Likewise, Members of Golden Omega are prohibited from making false statements or entering false data into any document. Examples of falsifications include: forging a third party’s signature, recording the attendance of individuals who were not present, attributing false statements to others, or altering dates, among others.

2.15 Industrial and Intellectual Property

All Golden Omega collaborators must respect and protect both the Company’s and third parties’ intellectual and industrial property. It is strictly prohibited for Members of Golden Omega to use, distribute, or commercialise products, processes, or technologies that are legally patented or protected by third parties without prior authorisation permitting such use.

In particular, the use of the Golden Omega trademark on capsule packaging or any other format containing Omega-3 within Chilean territory is prohibited for both Golden Omega Members and any individuals or entities providing services to the Company.

Members of Golden Omega must respect the intellectual property of third parties, particularly concerning their production processes and products, including patents, industrial designs, trade, and industrial secrets, as well as software programmes, among others. Compliance with current legislation is imperative at all times.

Proper handling of information is essential to Golden Omega’s reputation. Therefore, collaborators must maintain strict confidentiality regarding any information accessed in the course of their duties and must not disclose such information to third parties, including clients, family members, friends, business partners, or coworkers who do not need to know this information to carry out their work. Disclosure of confidential or trade secret information belonging to clients, advisors, suppliers, or Golden Omega is considered a serious breach. The only exceptions are information required by law or that which has been previously authorised for disclosure in writing by the client.

3 Organisational Structure

3.1 Ethics Committee

The main responsibilities of the Ethics Committee are:

- Alongside the Crime Prevention Officer, to lead investigative processes and propose the appropriate disciplinary or preventive measures in response to complaints received through the Whistleblowing Channel, relating to breaches of the Crime Prevention Model and this Code.
- To assist the Crime Prevention Officer in the development, implementation, and effective operation of the Crime Prevention Model.
- To act as an advisory body on matters of ethics and conduct.
- To propose to the Board of Directors the relevant updates and amendments to the Code of Ethics.

The Board of Directors of Golden Omega is responsible for appointing the members of the Ethics Committee.

3.2 Crime Prevention Officer

The main responsibility of the Crime Prevention Officer is the overall management of the CPM, including the implementation and enforcement of the protocols and procedures defined therein.

Additionally, the Crime Prevention Officer is in charge of managing the Whistleblowing Channel,

a mechanism that enables employees or third parties to confidentially report breaches of Law No. 20.393 and this Code of Ethics to Golden Omega.

The Crime Prevention Officer must also review clarification requests submitted by Golden Omega Members in cases where there is doubt regarding the legality, relevance, or ethical nature of a particular situation.

3.3 Compliance and Risk Committee

The main responsibilities of the Compliance and Risk Committee are:

- To promote the development of an ethical and compliance-oriented culture.
- To establish guidelines for an adequate process of risk identification, assessment, control, and monitoring.
- To support decision-making by establishing priorities that enable the identification of key risks within the organisation and minimise potential negative impacts on Golden Omega.
- Based on the results obtained, to manage the implementation of corrective actions that ensure key risks are controlled and/or mitigated.



4 Updating and Approval

This document was approved by the Board of Directors of Golden Omega at a meeting held on 5th November 2019. At the Board meeting held on 3rd Jun 2025, the update of this document was approved, based on the legal amendments introduced by Law No. 21.595.

If this document is subject to future updates, the preceding paragraph must record the Board meeting at which such updates were approved.



5 Final Chapter

All Members of Golden Omega must comply with this Code and the applicable laws in force.

Conduct that is contrary to the provisions of this Code will be subject to measures adopted by Golden Omega, in accordance with the seriousness of the breach and the provisions of the Internal Regulations on Order, Hygiene and Safety. This is without prejudice to any infringement that may arise under applicable legislation and any civil or criminal liability that may apply in each case.

For this purpose, all Members of Golden Omega are responsible for reporting to their supervisors and/or the Crime Prevention Officer, via the Whistleblowing Channel, any conduct they believe to violate this Code or applicable law.

Golden Omega will provide each Member of Golden Omega with this Code upon recruitment, and it will remain permanently available for consultation on the Golden Omega website: www.goldenomega.cl/es/nosotros/gobierno-corporativo/

Upon entry into force of this Code, as well as in the event of any update or amendment, a copy must be delivered to each Member of Golden Omega, who must sign a form acknowledging receipt of the document.

It is hereby recorded that the Employee expressly agrees that this annexe and all documents arising from the employment relationship may be prepared, processed, signed, and delivered electronically. If applicable, these documents shall be sent by email to the personal email address previously provided by the Employee to the Employer.

➤ **Work with dedication, integrity, honesty, and excellence, and be consistent with the values and policies of the Company.**



Code of Ethics Commitment Letter: Principles and Values

I hereby confirm that I have read the “Code of Ethics – Principles and Values” of Golden Omega and that I understand the importance and context of the rules set out therein.

I understand that compliance is mandatory for all members of Golden Omega and that by adhering to the Code of Ethics, I am contributing to a better working environment, my personal and professional development, and the prestige of Golden Omega.

Name, ID number, date, and place:



goldenomega®

EXPERIENCE THE DIFFERENCE

Code of Ethics

Principles and Values