

SALMONES AYSÉN	CRIME PREVENTION POLICY		
	Code: POL-COMP-001	Applicable to: All Salmones Aysén	
	Creation Date Oct.2021	Modification Date:	Version 001

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1. OBJECTIVE

The purpose of this Crime Prevention Policy is to establish the guidelines on which the adoption, implementation and operation of the Prevention Model of Salmones Aysén S.A. is based, in accordance with the provisions of Chilean Law No. 20,393 on Criminal Responsibility of Legal Persons and all its amending laws.

2. SCOPE

The scope of this Policy considers Salmones Aysén S.A., hereinafter and indistinctly “Salmones Aysén” or the “Company”.

3. DEFINITIONS

- 3.1. **Extractive activities without aquaculture concession, in areas of management and exploitation of benthic resources:** This crime is committed by anyone who carries out extractive activities in areas of management and exploitation of benthic resources, without being the holder of the rights referred to in the final paragraph of the Article 55 B of the Chilean General Law on Fisheries and Aquaculture (GLFA). (Article 139 bis, GLFA).
- 3.2. **Disloyal administration:** The one who, being in charge of the safeguarding or management of the patrimony of another person, or of any part of it, by virtue of the law, an order of the authority or an act or contract, causes damage, either by abusively exercising powers to dispose of it or compel it, or by executing or omitting any other action in a manner manifestly contrary to the interest of the owner of the affected property (Definition according to article 470 number 11 of the Chilean Penal Code).
- 3.3. **Misappropriation:** This crime is committed by anyone who, to the detriment of another, appropriates or diverts money, effects or any other movable property that they have received in deposit, commission or administration, or by another title that produces an obligation to deliver or return it (Definition according to article 470 number 1 of the Chilean Penal Code).

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3.4. Code of Ethics and Conduct: Guide for the members of the Board of Directors, managers, deputy managers, executives and all workers, regardless of their hierarchical rank, which promotes conduct based on rectitude and honesty, in each of their actions.

3.5. Bribery: Commits the crime of bribery:

3.5.1. Whoever gives, offers or agrees to give an economic or other benefit to a public official, for the benefit of the latter or a third party, due to the official's position under the terms of the first paragraph of article 248, or so that such official may carry out the actions or incur in the omissions indicated in articles 248. (Definition according to the Chilean Penal Code Article 250).

3.5.2. Whoever, with the purpose of obtaining or maintaining for himself or for a third party any business or advantage in the field of any international transactions or an economic activity carried out abroad, offers, promises, gives or consents to give to a foreign public official an economic benefit or of another nature for the latter or a third party, due to the position of the official, or for him to omit or execute, or for having omitted or executed, an act of his office or with infraction of the duties of his position, (Definition according to the Chilean Penal Code, Article 251 bis).

3.5.3. The public official who requests or accepts to receive an economic benefit or of another nature for him or for a third party to commit any of the crimes or misdemeanors expressed herein, or in paragraph 4 of Title III, will be sanctioned with the penalties of minor confinement in its maximum degree to greater confinement in its minimum degree, of perpetual absolute disqualification for public positions or offices and a fine of four times the benefit requested or accepted. If the benefit is of a nature other than economic, the fine will be from one hundred fifty to one thousand five hundred Unidades Tributarias Mensuales (Monthly Tax Units). (Definition according to Chilean Penal Code Article 249).

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3.6. Private Corruption:

3.6.1. The employee or representative (of the private sector) who requests or accepts to receive an economic benefit or of another nature, for him or a third party, to favor or for having favored, in the exercise of his duties, the contracting with one offeror over another (Definition according to article 287 bis of the Chilean Penal Code).

3.6.2. Whoever gives, offers or consents to give, to an employee or agent (from the private sector), an economic benefit or of another nature, for him or a third party, to favor or for having favored the contracting with one offeror over another (Definition according to article 287 ter of the Chilean Penal Code).

3.7. Pollution of bodies of water: Anyone who, without authorization, or contravening its conditions or violating the applicable regulations, introduces or orders to introduce into the sea, rivers, lakes or any other body of water, chemical, biological or physical contaminating agents that cause damage to hydro biological resources, as well as those who do so through imprudence or mere negligence. (Article 136, GLFA).

3.8. Crime Prevention Officer (CPO): Internal worker who has been appointed by the Board of Directors to manage the Crime Prevention Model, its design, implementation, updating and control

3.9. Financing of Terrorism: Crime committed by any person who, by any means, requests, collects or provides funds with the purpose of being used in the commission of any of the terrorist crimes, such as, for example, seizing or attacking a means of public transport in service, attack against the Head of State and other authorities, illicit association with the purpose of committing terrorist crimes, among others. (Definition according to Chilean Law No. 18,314, Article 8).

3.10. Management of hydro biological resources in a collapsed or overexploited state, or derived products, without proving their legal origin: Anyone who processes, prepares or stores hydro biological resources or products derived from them, with respect to which they do not prove their legal origin, and that correspond to

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resources in a collapsed or overexploited state, according to the annual report of SUBPESCA. (Article 139 ter, GLFA).

- 3.11. **Management of prohibited hydro biological resources:** This crime is committed by anyone who carries out activities of processing, dumping, transformation, transportation, marketing or storage of prohibited hydro biological resources, as well as the production, marketing and storage of products derived from those prohibited hydro biological resources. (Article 139, GLFA)
- 3.12. **Non-observance of isolation or other preventive measure ordered by the health authority, in case of epidemic or pandemic:** Employer (managers, deputy managers, bosses or whoever has the authority to dispose of the work of a subordinate within the Company) who orders an employee to go to work (when the workplace is different from the worker's home or place of residence), the latter being in a quarantine zone or in sanitary isolation, for having contracted the disease. (Article 318 ter., Chilean Penal Code).
- 3.13. **Money Laundering:** Crime committed by any person who in any way hides or disguises the illicit origin of certain assets, knowing that they come, directly or indirectly, from an illicit or, knowing of said origin, hides or disguises these assets. Or the one who acquires, possesses, has or uses for profit the aforementioned goods, when at the time of receiving them he/she has known the illicit origin of it. (Article 27, Law No. 19,913).
- 3.14. **Crime Prevention Model (CPM):** The Crime Prevention Model of Salmones Aysén S.A. consists of a preventive, detective, response, supervision and monitoring system, which promotes the prevention of the commission of the crimes indicated in Law No. 20,393. It identifies the activities or processes that generate or increase the risk of committing crimes, establishing protocols to prevent these risks from materializing.
- 3.15. **Incompatible negotiations:** Whoever is in charge of safeguarding or managing all or part of another person's property or assets, whether natural or legal; and directly or indirectly is interested in any negotiation, action, contract, operation or management in which he/she has to intervene in relation to the

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property or assets that he/she is in charge of, commits the crime of incompatible negotiations (Definition according to article 240 of the Chilean Penal Code).

3.16. Receiving of stolen goods: Whoever, knowing its origin or being unable to but know it, has in his possession, in any way, stolen or robbed species or object of cattle rustling, receiving or appropriation; transports, buys, sells, transforms or commercializes them in any way, even if he/she has already disposed of them (Definition according to article 456 bis A of the Chilean Penal Code).

3.17. Sanction: Consequence or effect of committing an infraction associated with non-compliance with the Crime Prevention Model or any of its associated controls.

4. GUIDELINES OF THE CRIME PREVENTION MODEL

4.1. Salmones Aysén will ensure that a suitable organization, administration and supervision model is maintained for the prevention of the crimes indicated in Law No. 20,393, called the "Salmones Aysén Crime Prevention Model", through which will be promoted the prevention of the commission of money laundering crimes; terrorist financing; bribery of a national or foreign public official; receiving; private corruption; unfair administration; incompatible negotiations; misappropriation; extractive activities without aquaculture concession, in areas of management and exploitation of benthic resources; management of hydro biological resources in a collapsed or overexploited state, or derived products, without proving their legal origin; contamination of water bodies; management of closed hydro biological resources; non-observance of the isolation or other preventive measure ordered by the health authority, in the event of an epidemic or pandemic, and of future crimes that are incorporated in article 1 of Law No. 20,393. In consideration of the foregoing, the directors, executives and workers of Salmones Aysén, as well as third parties related to it (contractors, advisors, agents, clients, among others) are **expressly prohibited** from carrying out any act that could constitute a crime or any conduct that may give rise to criminal charges against the Company.

4.2. The application and supervision of the rules established by the Salmones Aysén Crime Prevention Model will be in charge of an official who will have the title "Crime Prevention Officer", who will be appointed by the Company's Board of

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Directors for a term that may not exceed three years, renewable for periods of equal duration.

- 4.3. The Crime Prevention Officer will have the necessary independence to fulfill his functions, in the terms established in numeral 2 of article 4 of Law No. 20,393.
- 4.4. The Board of Directors, the CEO, the Ethics Committee and the Crime Prevention Officer of Salmones Aysén, will be jointly responsible for the adoption, implementation, administration, updating and supervision of the Crime Prevention Model.
- 4.5. The Board of Directors of Salmones Aysén will provide and/or authorize the provision, on an annual basis, of the resources, means and powers (work team, material resources, budget, among others), to the Crime Prevention Officer for the development of their functions and activities.
- 4.6. The Crime Prevention Officer will have access to information related to his scope of action, as well as to the Board of Directors of Salmones Aysén, in order to report on the management of the Crime Prevention Model on a semi-annual basis and/or when circumstances so require it.
- 4.7. The Crime Prevention Officer will disseminate and communicate to Salmones Aysén workers the Crime Prevention Model, as well as the roles and responsibilities that emanate from it and the sanctions for non-compliance.
- 4.8. Salmones Aysén will ensure compliance with all applicable laws, regulations and procedures, related to the crimes indicated in article 1 of Law No. 20,393.
- 4.9. The Crime Prevention Model will be updated when relevant changes occur in business conditions, an activity for which the Crime Prevention Officer will be responsible.
- 4.10. The Crime Prevention Model may be certified, when Salmones Aysén deems it appropriate, in accordance with the provisions of Article 4 b) of Law No. 20,393.

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5. ROLES AND RESPONSIBILITIES

The roles and responsibilities of those responsible for the adoption, implementation, administration, updating and supervision of the Salmones Aysén Crime Prevention Model are detailed below:

5.1. SALMONES AYSÉN BOARD OF DIRECTORS

- 5.1.1. Appoint and/or remove from office the Crime Prevention Officer, in accordance with the provisions of Law No. 20,393. The Board of Directors of Salmones Aysén may, every three years, extend said appointment.
- 5.1.2. Provide or authorize the provision of the necessary means and resources so that the Crime Prevention Officer can fulfill his roles and responsibilities, depending on the size and economic capacity of Salmones Aysén.
- 5.1.3. Approve the Crime Prevention Policy.
- 5.1.4. Ensure the correct implementation and effective operation of the Crime Prevention Model.
- 5.1.5. Receive and analyze the reports on the management and operation of the Crime Prevention Model generated by the Crime Prevention Officer, at least every six months.
- 5.1.6. Inform the Crime Prevention Officer of any situation observed that is related to Law No. 20,393 and the procedures related to the Crime Prevention Model.
- 5.1.7. Decide whether to opt for the Crime Prevention Model certification, in accordance with the provisions of Law No. 20,393.

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5.2. CEO OF SALMONES AYSÉN

- 5.2.1. Ensure the correct implementation and effective operation of the Crime Prevention Model in Salmones Aysén.
- 5.2.2. Provide the information required by the Crime Prevention Officer for the performance of his functions in relation to the implementation, operation and effectiveness of the Crime Prevention Model.
- 5.2.3. Approve the Crime Prevention Procedure.
- 5.2.4. Approve the Whistleblowing Procedure.
- 5.2.5. Inform the Crime Prevention Officer of any situation observed that is related to Law No. 20,393 and the procedures related to the Crime Prevention Model.
- 5.2.6. Ensure the Crime Prevention Officer the unrestricted access to information and people, and also ensure the coordination of the activities of the Crime Prevention Model in the areas that may be required.
- 5.2.7. Implement the controls that permit to mitigate the risks identified in the crime risk matrix, and inform the Crime Prevention Officer of any new risk that is identified.

5.3. ETHICS COMMITTEE.

The Ethics Committee will have regular sessions every six months and extraordinarily when required by the needs of the Committee, to decide on any matter.

In relation to the Crime Prevention Model, its main functions and responsibilities are:

- 5.3.1. Ensure compliance with the Code of Ethics and Conduct of Salmones Aysén, its values and fundamental principles.

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5.3.2. Support the Crime Prevention Officer in the different control activities that he carries out, mainly in the process of identifying and analyzing complaints that apply to the Crime Prevention Model, the determination of investigations and possible sanctions in this regard, depending of the seriousness of the case.

5.3.3. Request reports from the Crime Prevention Officer, when the circumstances so warrant.

5.3.4. Be aware of the six-monthly report that the Crime Prevention Officer makes to the Board of Directors of Salmones Aysén.

5.3.5. Be aware of the complaints received, the results of the investigations and resolve the applicable sanctions according to the proposal made by the Crime Prevention Officer, depending on the seriousness of the complaint, in accordance with the provisions of the Complaints Procedure.

5.4. CRIME PREVENTION OFFICER

5.4.1. Ensure the correct establishment and operation of the Crime Prevention Model, developed and implemented by Salmones Aysén.

5.4.2. Promote that the internal processes and activities of Salmones Aysén have effective crime risk prevention controls and maintain the record of evidence of compliance and execution of these controls.

5.4.3. Propose to the Board of Directors the necessary means and resources to fulfill their role and responsibilities in Salmones Aysén.

5.4.4. Train workers in matters under the scope of Law No. 20,393 and the Crime Prevention Model implemented by the Company, at least once a year.

5.4.5. Report, at least every six months and/or when circumstances warrant, to the Board of Directors of Salmones Aysén on the operation and management of the Crime Prevention Model.

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- 5.4.6. Submit to the Ethics Committee, for its information, the semi-annual report to be presented to the Board of Directors.
- 5.4.7. Establish and comply with the Policy and Procedure of the Crime Prevention Model, and suggest developing and implementing any other policy and/or procedure that it deems necessary to complement the control environment of the existing Crime Prevention Model.
- 5.4.8. Permanently evaluate the effectiveness and validity of the Crime Prevention Model implemented and its compliance with laws and other regulations, informing the Board of Directors of Salmones Aysén, regarding the need and convenience of its modification.
- 5.4.9. Be aware of and carry out an analysis of any complaint or unusual or suspicious operation, of which it becomes aware by any means, and, if deemed necessary, submit the case to the Ethics Committee and the Board of Directors, when appropriate. For analysis purposes, the Crime Prevention Officer must collect all the documentation related to that operation, generating a background file for such purposes.
- 5.4.10. Document and safeguard evidence related to crime prevention activities.
- 5.4.11. Lead the certification process of the Crime Prevention Model and represent Salmones Aysén before the certifying company.
- 5.4.12. Carry out the follow-up of the recommendations or instructions that emanate from the certification process or regulatory entities.
- 5.4.13. Oversee the updating of the Crime Prevention Policy and Procedure, in accordance with the regulatory changes and the business environment of Salmones Aysén.
- 5.4.14. Participate, when appropriate, in the lawsuits, complaints or legal proceedings that Salmones Aysén decides to undertake in relation to the crimes indicated in Law No. 20,393, and provide all the information that it

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maintains in its possession or of which it has knowledge by reason of his position.

5.4.15. Carry out special tasks that the Board of Directors of Salmones Aysén entrusts in relation to the matters of his competence.

5.4.16. Exercise the role of Crime Prevention Officer, as established by Law No. 20,393, and in accordance with the powers defined for the position by the Board of Directors of Salmones Aysén.

5.5. AREAS OF SUPPORT FOR THE CRIME PREVENTION MODEL

The areas of support for the Crime Prevention Model are the following:

5.5.1. Administration and Finance Management

5.5.2. Human Resources Management.

5.5.3. Head Office of Legal Affairs.

The responsibility control activities of each support area are detailed in the document "Crime Prevention Procedure".

5.6. EMPLOYEES, ADVISERS, CONTRACTORS AND OTHERS

They must comply with the provisions of this Policy and the Salmones Aysén Crime Prevention Model.

They must report, through the established channels, the situations that could go against the provisions of this Policy and the Company's Crime Prevention Model.

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6. APPROVAL AND UPDATING

For all purposes, this document was approved by the Board of Directors of Salmones Aysén in the session of December 23, 2021.

The Crime Prevention Policy will be reviewed and updated as needed, from its entry into force, by the Crime Prevention Officer, who will propose the corresponding changes to the Board of Directors, both in form and substance.

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