



CORPORATE CRIME PREVENTION MANUAL

Version: 1.0

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INTRODUCTION

Mathiesen Group defines itself as a sustainable company that is concerned about caring for and protecting the environment in which it does business through our main actors and pillars: **employees, suppliers and customers.**

That is why as a company, we propose a fair balance between developing business and our stakeholders.

Mathiesen and its Employees

We believe and we are sure that our employees are unique and peerless, so we endeavor to create a pleasant environment and achieve a work and family balance



Suppliers Customers

We are focused on building and maintaining long-term relationships with our suppliers – strategic partners – and on contributing value to the business of both parties to attain a profitable growth sustainable over time.

Our close relationship with customers enables us to develop enduring projects over time to create trust and continuing improvement of businesses.

We have adopted this corporate crime prevention manual (MPD, the Spanish acronym), according to our values and principles and the stipulations in national and international standards that impose **a criminal liability upon legal entities** for certain crimes.

I. Purpose

The purpose of this MPD is to set down the procedures to implement and operate the Prevention Model defined by the Mathiesen Group. That model includes a description of the activities that will be implemented for the MPD to work, the pertinent procedures and the designation of the respective positions responsible. The purpose is to comply fully with the rules of the Mathiesen Group that are an integral part of this document, in particular the “Mathiesen Group Principles,” that set down our principles as a company and always aim to develop our businesses within an ethical framework according to the healthiest corporate practices.

2. Scope

This Manual applies to the owners, controllers, directors, managers, responsible individuals, senior executives, representatives, senior management and employees of the Mathiesen Group as well as third parties related to it and to the above-mentioned persons.

3. Prevention Model

The Prevention Model involves monitoring the processes and activities that are exposed to a violation of our principles and business foundations through diverse control activities as well as the crimes of Asset Laundering, Terrorism Financing, Bribery of a Public Official (national or foreign), Concealment, Conflicts of Interest, Private-to-Private Corruption, Misappropriation, Disloyal Administration, Water Contamination, Crimes Violating Immigration, Weapons Control and Data Processing Laws.

This MPD has been designed on the basis of the results of a risk survey that was done in a stage prior to the preparation of this document and that is contained in Appendix 7 to this document.

Our highest administrative authorities are responsible for the adoption and implementation of this MPD.

This MPD contains the following elements:

- Appointment of a Prevention Officer.
- Definition of the Prevention Officer’s resources and authority.
- Establishment of a prevention system.
- Supervision and certification of the model.

IV. Organizational Structure of the Prevention Model

IV.1 Prevention Model Owner

The board of directors, the senior management of Mathiesen Group and the Crime Prevention Officer, Mr. Rodrigo Parés Contreras, will be jointly responsible for the adoption, implementation, administration, update and supervision of this MPD. Mr. Parés was appointed to this position at the board of directors meeting held September 21, 2020, which is recorded in the minutes of that meeting.

IV.2 Prevention Officer

The following applies to the Mathiesen Group Prevention Officer:

- He reports administratively to the Chief Executive Officer and functionally to the Mathiesen Group board of directors.
- He must be appointed and removed by the Mathiesen Group board of directors.
- He will hold office for a period of three years. That term may be extended for new periods of the same duration.
- He is autonomous from senior management, shareholders, directors and controllers.
- The Mathiesen Group Management will give him the resources and material means needed to perform his work adequately, in particular sufficing for operation of the Prevention Model considering the size and complexity of the organization.
- He has direct access to the Mathiesen Group board in order to inform the board opportunely of the measures and plans implemented in performing his duties and to report on his work, which he must do quarterly.
- He has direct and unrestricted access to all information of the Mathiesen Group relating to his job.

IV.3 Prevention Officer Work Plan

The Prevention Officer's work plan will be developed mainly through the following activities:

- Identification of the risk of the commission of crimes to which the company is exposed. He must prepare and/or update the matrixes at least every two years that identify the usual and sporadic activities or processes of the Mathiesen Group that in which there is a risk or a greater risk of commission of the crimes indicated in the different bodies of law, hereinafter the "**Risk Matrixes.**" The Risk Matrixes must be presented to the Chief Executive Officer of the Mathiesen Group for approval.
- Determination of the activities to monitor identified risks.
- Documentation on the monitoring activities in a work plan.
- Ongoing training of employees in the crimes with which we are concerned.

The Prevention Officer will present a quarterly report on his work to the Mathiesen Group board that will report on the measures and plans implemented as part of his job. The reports will cover at least the following topics:

- Prevention actions
- Early detection actions
- Response actions
- Model supervision and monitoring actions

The format of the management report to be prepared by the Prevention Officer is contained in Appendix 1 (page 16) of this Manual. The Mathiesen Group Management Committee may decide that the Prevention Officer provide informational reports to other areas.

V. Prevention Procedure – Crime Prevention System

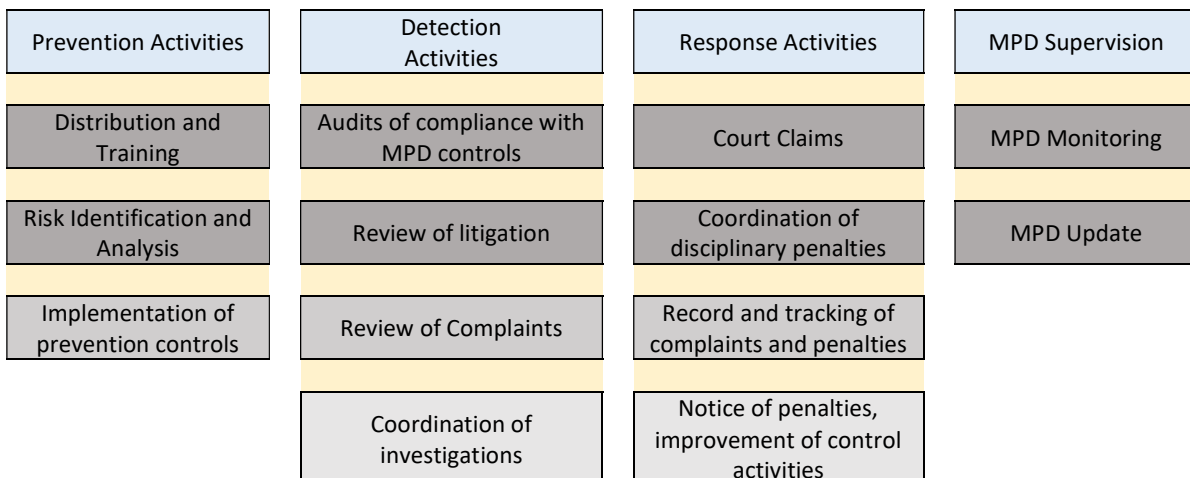
V.1 Introduction

The Prevention Model will be implemented through several activities that include:

- Prevention activities
- Detection activities
- Response activities
- Model supervision and monitoring activities

Below is a chart of the Prevention Model Activities:

Crime Prevention Model



V.2 Prevention Activities

Effective prevention helps avoid improper conduct or omissions from the start or origin. The purpose of prevention activities is to avoid breaches or violations of the Model and to continue to abide by our principles and the laws that govern us.

The prevention activities in the Prevention Model are:

- Distribution and training
- Risk identification and analysis
- Implementation of prevention controls

The content and elements of each prevention activity are described below:

(A) Distribution and training

The Prevention Officer will design an annual training plan that he will present to the Chief Executive Officer of the Mathiesen Group for approval. This plan will contain the aspects related to the MPD as well as the internal policies and directives of the Mathiesen Group on bribery, gifts, entertainment (such as meals with customers or suppliers), contributions and donations and all policies of the Mathiesen Group that aim to prevent the crimes with which we are concerned.

A Prevention Officer must, in conjunction with the highest authorities in the company:

1. Ensure an effective communication of the MPD policies and procedures. That communication must involve all levels of the company.

He must keep an accurate, written record that will serve as proof of training participants. This is part of the information to be reported to the Senior Management of the Mathiesen Group. Human Resources will have the duty to keep such records and the Prevention Officer must confirm that they exist and are available, in addition to reporting to senior management and his functional superior on the training and distribution activities undertaken.

2. Ensure that the subject matters contained in the MPD are included in the Mathiesen Group induction programs and in employment contracts, internal regulations and/or code of conduct.
3. Ensure that regular training is provided at least annually to employees of the Mathiesen Group on:

- a. Corporate Values
- b. The Prevention Model and all its components.
- c. The crimes to which we must pay special attention.
- d. The Corporate Code of Conduct and Internal Regulations of the Mathiesen Group.
- e. The policies and directives on:
 - i. bribery and corruption
 - ii. procurement
 - iii. the purchase of inputs and services
 - iv. purchases for distribution
 - v. Know Your Customer
 - vi. credits and collections
 - vii. inventories
 - viii. property, plant and equipment
 - ix. conflicts of interest
 - x. employee recruitment and selection
 - xi. gifts, discounting, gratuities, travel and donations
 - xii. money management
 - xiii. data protection and information processing security

(B) Risk Identification and Analysis

In the Mathiesen Group, the Prevention Officer is responsible for identifying and analyzing risks.

This process will be undertaken at least annually or whenever there are material changes in the Company's conditions.

The following activities will be undertaken in this respect:

- Risk identification
- Control identification
- Risk assessment
- Control assessment

The risk identification and analysis process will be documented in the Risk Matrixes.

1. Risk Identification

Risks will be identified by interviewing area managers and individuals who hold leadership positions in the company. This will help identify the main scenarios of risks run in the direct and immediate interest or advantage of the company by its owners, controllers, responsible individuals, senior executives, representatives or anyone performing activities of

administration and supervision and by the individuals who are under the direct management or supervision of any of such officers.

2. Risk Mitigators

The elements mitigating the risks found and set down in Risk Matrixes are divided into two categories:

- Procedures
- Policies

Control procedures will be identified and designed, whenever necessary, in the aim of increasing efficiency and effectiveness and the product must be a description of each of the procedures identified and evidence of their existence.

The following must be identified for each control procedure:

- A description of the control activity
- Frequency
- Identification of the person responsible for implementation
- Supporting evidence obtained from forensic analysis
- Type of control (manual or automatic).

Moreover, corporate policies must be disclosed on a regular basis, starting with the arrival of each new employee, and they must be reported regularly to our suppliers, contractors and subcontractors.

3. Risk assessment

Identified risks must be assessed to prioritize them and determine the areas or processes most exposed. This will help focus the resources and efforts of the Prevention Officer.

The parameters of impact and probability described in Table 1 and Table 2 below will be used to assess risks. For these purposes:

- Impact means the effect or damage to the organization should a risk occur;
- Probability means the level of certainty that the risk will occur.

4. Control assessment

The design of the controls identified in point 2 above will be assessed in relation to mitigating the risk to which it applies. That assessment must be made by the Prevention

Officer together with the MPD supporting areas based on the risk assessment of the Mathiesen Group described in point 3 above.

In evaluating the design of each control, it must be considered whether the following elements combined will reasonably mitigate the occurrence of the associated risk:

Characteristics	Attribute to be evaluated
Type of Control	Preventive / Detective
Category	Manual / Automatic
Evidence	Documented / Undocumented
Segregation of duties	The person responsible for implementing the control must not be the same person who reviews it
Frequency	Recurrent, daily, weekly, monthly, quarterly or annually

(C) Implementation of prevention controls

Prevention controls are all controls associated with the areas, processes and activities defined as risky, as documented in the Risk Matrixes.

The identified risks are escribed in detail in these matrixes as well as the control activities that have been or should be performed by the Prevention Officer.

V.3 Detection Activities

The purpose of these activities is to take the actions to detect violations of the model or potential scenarios for commission of the aforesaid crimes.

The Prevention Model detection activities are:

- Audits of compliance with the Prevention Model controls
- Review of litigation
- Review of complaints
- Coordination of investigations

(A) Audits of compliance with Model controls

The Prevention Officer must, through compliance audits, confirm from time to time, at least semi-annually, that the Model controls are operating effectively. The Prevention Officer may conduct these audits directly or through a designate from among the individuals performing auditing work in the Mathiesen Group.

(B) Review of Litigation

The Legal Department or Outside Counsel of the Mathiesen Group, as the case may be, will deliver a report quarterly to the Prevention Officer that describes:

- the activities resulting from audits performed by regulatory entities in relation to potential crimes involving the criminal liability of legal entities.
- the lawsuits, complaints or any other legal action involving the organization in any potential crime under the laws covered by the Model.
- the fines and/or infringements imposed or under review by regulatory entities because of potential crimes under the laws covered by the Model.

(C) Review of complaints

The Prevention Officer will make an analysis, at least quarterly, of the complaints received through the channels made available by the Mathiesen Group in order to identify any that are within the scope of the Model or are associated with potential crimes under the laws covered by the Model.

Complaints will be handled following the “Complaints Procedure” contained in Appendix 4 (page 17).

(D) Coordination of investigations

The Prevention Officer will coordinate, together with the outside counsel appointed by the Chief Executive Officer, the investigation of complaints and/or lawsuits that have implications for the Prevention Model.

The investigation of complaints will be coordinated according to the Complaints Procedure contained in Appendix 4.

V.4 Response Activities

The purpose of response activities is to adopt decisions, disciplinary measures and/or penalties against anyone violating the Model.

The Prevention Model Response Activities are:

- Evaluation of complaints
- Disciplinary penalties
- A record and tracking of complaints and penalties
- Notice of penalties and improvements to any weak Prevention Model control activities

1. Evaluation of complaints

Upon receiving a complaint according to the Complaints Procedure contained in Appendix 4 that expressly identifies the commission of the crimes with which we are concerned, the Prevention Officer must evaluate the need or convenience, together with the Mathiesen Group attorneys and his functional superiors, of filing actions with the Courts of Justice (Criminal Courts), the Office of the Public Prosecutor or the Police.

2. Disciplinary penalties

The Mathiesen Group will apply disciplinary measures to anyone violating the Prevention Model policies and procedures or upon detecting potential signs of crimes, taking in consideration that the disciplinary measures must be:

- proportional to the violation,
- consistent with the organization's disciplinary policies and procedures that are set down in each directive of the Mathiesen Group,
- applicable to every individual or area involved.

The Prevention Officer must advise the areas involved in defining and implementing the corrective measures adopted.

3. Record and tracking of complaints and penalties

The Prevention Officer must keep a current record of complaints, investigations (under way and closed) and disciplinary measures applied in relation to violations of the Model or the crimes detected, following the "Complaints Procedure."

The Prevention Officer must conduct a monitoring or review of the status of the different complaints received or under way at least quarterly.

The above activities must be performed according to the "Complaints Procedure."

4. Notice of penalties and improvement of weak MPD control activities

In conjunction with the Management Committee, the Prevention Officer must do the following as a result of the investigation and decision on any violations:

- Decide whether it is convenient to disclose the disciplinary measures to the entire company in order to inform employees and third parties involved of the Mathiesen

Group's firm commitment to safeguarding the principles and ethical values declared in the Mathiesen Group's Code of Conduct.

- Evaluate the control activities violated in each of such cases to determine the need to:
 - a. establish new control activities, or
 - b. make improvements to control activities that did not work effectively or that are inadequately designed.

V.5 Supervision and Monitoring of the Prevention Model

The purpose of the supervision and monitoring is to verify that the control activities defined are working properly and to evaluate the need to make improvements to the Prevention Model.

The Prevention Officer will perform the duties of monitoring and evaluation of the Prevention Model and must constantly undertake the following activities:

- Monitoring of the operation of the Prevention Model
- Update of the Prevention Model

V.6 Prevention Model Monitoring

The Prevention Officer can request support from other areas in the organization to conduct monitoring activities provided those areas are not involved in the activity to be reviewed.

The Prevention Officer may perform the following monitoring activities, among others:

- Review of the supporting documentation on the control activities performed by the supporting areas.
- Reprocessing of control activities (by sampling).
- Analysis of the reasonableness of transactions.
- Confirmation of compliance with the restrictions set down in the control procedures.

The Prevention Officer must determine and document the criteria to be used in monitoring activities that require deciding on a sample.

The monitoring activities are described in the Mathiesen Group Risk Matrixes.

V.7 Prevention Model Update

The Prevention Officer must propose an MPD update to the Mathiesen Group Management Committee when the annual assessment of the design and effective operation of the MPD indicates that this is necessary.

The Prevention Officer must, in updating the MPD:

- know the new regulations applicable;
- know the relevant changes in the company and/or industry in which it does business;
- track the improvements made to control activities.

Based on the information obtained, the Prevention Officer must update the Risk Matrixes and the corresponding policies and procedures.

This MPD must therefore be permanently checked and reviewed at least annually by the Prevention Officer, who must propose changes of form and substance that he deems pertinent.

The MPD may also be evaluated independently, such as a review by the Chief Executive Officer of the Mathiesen Group or an outside company, who must analyze and evaluate each of the elements in the Model and their components.

VI. Areas of Support to the Crime Prevention Model

For purposes of this MPD, the main function of the supporting area is to provide support to the Prevention Officer in the prevention, detection, response, supervision and monitoring activities comprising the MPD. This may be in the form of assistance in decision-making, support in arranging for activities, delivery of information, and the like.

Below is a description of the main supporting areas:

- Chief Executive Officer (see Activity description)
- Legal Department – Outside Counsel (see Activity description)
- Finance Division (see Activity description)
- Procurement Division (see Activity description)
- Human Resources (see Activity description)
- Commercial Area (see Activity description)

VII. Certification of the Crime Prevention Model

After the MPD has been implemented and put into effect, the Mathiesen Group will keep the Model in full force and it will be certified once it is determined that the Model is working effectively at full capacity in order to provide support and give appropriate importance to the certification.

Once the Model has been certified, certification will be repeated every two to three years or earlier if changes are seen in the business conditions or the senior management deems it necessary.

VIII. Effective Date

This MPD will take effect upon official publication by the Mathiesen Group on the company's Intranet and upon disclosure to employees about its implementation.

Appendix 1

MPD MANAGEMENT REPORT

The Prevention Officer has a detailed format for the MPD Management Report that forms a part of this Manual.

Appendix 2

KNOW YOUR CUSTOMER

We understand that one of the “cornerstones” of every MPD and of ours in particular is a good and appropriate understanding of our counterparties, which includes customers, employees, suppliers, contractors and subcontractors.

This requires us to identify and know our customers, employees and counterparties in general, which is an effective tool that will enable us to prevent, by risk management, the crimes discussed in this MPD.

In this respect, the Mathiesen Group has a know-your-customer policy that is the basis of the crime prevention system designed on the concept of “know your customer.” This consists of a due diligence framework by which we understand the activities that are performed, the most relevant characteristics of the operations that are undertaken and of the foundations on which they are supported.

Appendix 3

CRIME PREVENTION OFFICER

The Prevention Officer was appointed at the board meeting of the Mathiesen Group held September 21, 2020.

He was granted diverse powers and given sufficient autonomy to perform his job. In the Mathiesen Group, this task is performed by **Rodrigo Parés Contreras**, who is also indistinctly called the “Prevention Officer,” “Corporate Crime Prevention Officer” or “Compliance Officer.”

The Prevention Officer and the highest authorities in the Mathiesen Group have developed this MPD, and the Prevention Officer will be in charge of ensuring compliance with the standards, protocols and policies set down in governing national regulations and in the internal directives of the Mathiesen Group, most notably the Corporate Values and Code of Conduct, so that our company and everyone working for it or representing it engage in “Good Corporate Citizen” behavior in the

conduct of business and behave according to our values and refrain from any conduct that may constitute any of the crimes with which we are concerned.

The duties of the Crime Prevention Officer and the protocol for their appointment, their budget and the informational reports to be delivered are described in the following file: [CRIME PREVENTION OFFICER](#).

Appendix 4

INTERNAL INVESTIGATION, COMPLAINT AND PENALTY PROCEDURE

The Mathiesen Group has adopted a procedure to receive, accept, investigate and punish any infringements or activities performed by members of the Mathiesen Group that violate its Crime Prevention Model, especially its corporate values and the prevention system, protocols and specific procedures therein described, reported directly or anonymously by employees, customers, suppliers, shareholders and/or third parties.

The document describing these procedures identifies violations, the principles on which internal reports are based, the principle of complainant protection, the record of complaints and the protocols on investigation and treatment of the results of the investigation.

The Prevention Officer has this document and it can be viewed in the following file: [INTERNAL INVESTIGATION, COMPLAINT AND PENALTY PROCEDURE](#).

Appendix 5

AUDIT PROGRAM MONITORING AND IMPLEMENTATION

Auditing and monitoring do not necessarily mean the same thing. Monitoring is done using control systems as designed and implemented by management to direct and correct daily operations.

Monitoring systems must be daily and the scope of application must be broad to appropriately facilitate actions by management.

On the other hand, auditing predominantly consists of a retrospective testing of the monitoring system itself to ensure that it is working appropriately. An audit must also include a periodic review of the monitoring system designed to ensure that the system is working appropriately. Finally, audits must be proactive in attempting to identify new potential risks for the organization.

The Crime Prevention Officer has the definitions and protocols and they are in the document entitled: [AUDITING PROGRAM MONITORING AND IMPLEMENTATION](#).

Appendix 6

CRIMES LISTED IN CHILEAN LAWS 20,393, 21,121 and 21,132

The Crime Prevention Officer has the crimes, their definitions and associated penalties, which can also be viewed in the following file: [Crimes Listed in Chilean Law 20,393, 21,121 and 21,132 in relation to Mathiesen Group Directives and Controls](#), which forms an integral part of this Crime Prevention Model.

MATHIESEN GROUP VALUES**Mathiesen
and its Employees**

We believe and we are sure that our employees are unique and peerless, so we endeavor to create a pleasant environment and achieve a work and family balance

**Suppliers Customers**

We are focused on building and maintaining long-term relationships with our suppliers – strategic partners – and on contributing value to the business of both parties to attain a profitable growth sustainable over time.

Our close relationship with customers enables us to develop enduring projects over time to create trust and continuing improvement of businesses.

MATHIESEN GROUP POLICIES

Throughout its history, the Mathiesen Group has drafted policies that are intended to provide guidelines for action in attaining our goals. These policies are intended to resolve and minimize the potential conflicts of interest that may occur inside the Mathiesen Group and in our environment (physical, commercial, regulatory, etc.) and to guide us in our daily work, always in the aim of making the best decisions in an ethical context.

Our policies are listed below, which also form an integral part of this Corporate Crime Prevention Model:

- i. Bribery and Corruption Policy
- ii. Procurement Policy
- iii. Policy on the Purchase of Inputs and Services
- iv. Policy on Purchases for Distribution
- v. Know Your Customer Policy
- vi. Credits and Collections Policy
- vii. Inventories Policy
- viii. Property, Plant and Equipment Policy
- ix. Conflicts of Interest Policy
- x. Employee Recruitment and Selection Policy
- xi. Gifts, Discounting, Gratuities, Travel and Donations Policy
- xii. Money Management Policy
- xiii. Policy on Data Protection and Information Processing Security

AREAS OF SUPPORT TO THE MATHIESEN GROUP CRIME PREVENTION MODEL

Chief Executive Officer and Crime Prevention Officer

- Review the Prevention Model.
- Support implementation of the Prevention Model activities requested by the Prevention Officer that are consistent with the area's independence.

Outside Counsel

1. Advise on the inclusion of compliance clauses in the different contracts made by the Mathiesen Group with third parties.
 - Advise on the inclusion of compliance clauses in employment contracts and in the Internal Regulations on Order, Hygiene and Safety of the Mathiesen Group.
 - Conduct preventive and detective controls to confirm that the Prevention Manual is effective.

- Deliver quarterly reports to the Corporate Prevention Officer on claims and/or lawsuits filed by the organization in relation to the crimes with which we are concerned.
- Provide quarterly reports to the Corporate Crime Prevention Officer on the review of fines imposed on the organization by regulators in order to detect cases affecting compliance with the law.
- Advise on the investigation and analysis of complaints.
- Advise on the decisions on penalties and corrective actions to be taken as a result of investigations that have concluded.

Finance Division

- Conduct a strict tracking of the control model for the resources allocated to the company's "Petty Cash." The Finance Division must prepare monthly reports to the Corporate Crime Prevention Officer on the petty cash activity, whether or not there has been any use. Any expense defrayed with petty cash must exactly follow the guidelines in the internal control procedures and any anomaly must be reported promptly by the Finance Division to the Prevention Officer.
- Provide timely information upon request by the Prevention Officer needed in relation to the operation of the Prevention Model.
- Send the Prevention Officer a list monthly on the use of credit cards given by the Mathiesen Group to its officers and on expense statements that they present. The Prevention Officer will compare that information to the information provided by the commercial areas on lunches, meals, etc., that may be held with public officials, whether national or foreign.

Traders

- Include the Prevention Model in their regular review plan.
- Promptly report all invitations, promotions, offers, etc., to the Prevention Officer that employees in the area may receive from national or foreign suppliers. Should none of these events occur, a quarterly report must be sent to the Prevention Officer stating that there were no situations to report. This is fundamental to the performance of the Prevention Officer's work in relation to the operation of the Prevention Model.
- Send the Prevention Officer a list monthly of all lunches, meals, etc., that may have taken place with suppliers and customers, whether national or foreign. The report must also indicate whether those meals were paid using corporate credit cards, an expense statement or any other form using resources of the Mathiesen Group. The Prevention Officer will compare that information to what he receives from the Finance Division.
- Support the implementation of Prevention Model activities requested by the Prevention Officer that are consistent with the area's independence.
- Coordinate with the Prevention Officer that all suppliers and customers are appropriately registered as such. The Group's RP and CRM will be used, which is the basic tool for keeping custody of information.

- Suppliers must be informed of the existence of this Model within no more than 12 months as of its implementation, and they must be asked to issue a statement acknowledging that they know of the Model and its scope, and that they promise to respect it and to promptly report any violation to the Mathiesen Group.
- In any case, the Mathiesen Group will give preference to working with suppliers who have their own Corporate Crime Prevention Models.

Human Resources Division

- Conduct preventive and early detection controls, such as support in the signature of contracts with employees and third parties.
- Promptly provide the information requested by the Prevention Officer for his job in relation to the implementation, operativity and effectiveness of the Prevention Model.
- Implement the controls of the risks identified as a result of investigations made in relation to the Prevention Model or for any new risk identified.
- Advise on the inclusion of compliance clauses in the diverse contracts made by the Mathiesen Group with its employees.
- Any hiring of a direct family member of a public official for any position in the organization must be first discussed with the Prevention Officer to ensure that there is no indirect favoring of a public official who might have any level of involvement in decisions that could be of benefit to the Mathiesen Group.
- Support coordinating the Prevention Model distribution activities of the Prevention Officer, which include:
 - Effective communication of prevention policies and procedures. This communication must involve all levels of the company, including the Senior Management of the Mathiesen Group.
 - The Human Resources Division must keep evidence of such effective communication.
 - Periodic training in the Model. The Human Resources Division must keep a record of training participants, and that information must be sent to the Prevention Officer upon request.
 - Include topics of the Prevention Model in the induction programs of employees joining the organization.
- Deliver the necessary information to the Prevention Officer on employees under investigation.
- Provide a quarterly report to the Prevention Officer on the status of employee loans, which must include the following:
 - New loans granted in the quarter;
 - Renewals, rescheduling or renegotiations of existing loans;
 - Any delinquency or delay in the payment of loans;
 - The way in which the interest rate is calculated (when applicable).

- Advise on the decisions on eventual penalties and actions to take as a result of investigations.

Commercial Area

- Ensure that any request for sponsorship or other similar activities abides strictly by the Mathiesen Group's policies; and if it is to be disclosed in government-controlled media or media controlled by government companies, request prior approval of the Chief Executive Officer and report this to the Prevention Officer.
- Support coordinating the Prevention Model distribution activities.
- Promptly provide the information requested by the Prevention Officer for his job in relation to the implementation, operativity and effectiveness of the Prevention Model.
- Provide support in implementing the controls of the risks identified as a result of investigations made in relation to the Prevention Model or for any new risk identified.
- The cornerstone of the Model in regard to Asset Laundering prevention lies on a thorough knowledge of the customer, particularly customers that make cash purchases. Therefore, it is a fundamental requirement that the "**Know your Customer**" form contained in APPENDIX 2 of this Manual be followed prudently and with the utmost meticulousness. This document must be delivered to the Prevention Officer before establishing any business relationship with a third party. This will also apply to all customers in all business units of the Mathiesen Group after the Prevention Model is implemented, and they will have a period of six months to implement it in full (a Know Your Customer form must be prepared for each customer with whom transactions are performed).
- Always take care not to welcome or deal with public officials at any meeting, whether they are national or foreign, unless there are at least two executives of the Mathiesen Group present. Minutes of the topics discussed must be delivered to the Prevention Officer after these meetings.
- Give the Prevention Officer a list monthly recording all courtesies, lunches, meals, etc., that may have taken place with national or foreign public officials that have been paid by reimbursements, expense statements or any other form using resources of the Mathiesen Group. The Prevention Officer will compare this information to what he receives from the Finance Division.
- Always bear in mind all internal rules adopted by the Mathiesen Group, in particular the following:
 - Gifts, Entertainment and Expenses
 - Conflicts of Interest Policy
- The pertinent Commercial Area must keep a record of every tender in which the Mathiesen Group participates, either by a direct or public invitation, to supply or provide services to the State of Chile or another country or to Chilean or foreign government companies. That record must contain at least the following information:
 - Tender number
 - Tender date

- Date of submission
- Person responsible for preparing the bid(s)
- Person responsible for costing the equipment/services tendered
- Name of the contact persons for the tender
- The document stipulating the price at which the Mathiesen Group will participate in the tender, properly supported
- A copy of the letter by which the Mathiesen Group submits a bid
- A copy of the decision on award of the bid

This document must be filed under the responsibility of the department that participated in the tender and must be shown to the Prevention Officer upon request.

The General Management of each related company must send a quarterly report to the Prevention Officer on the number of tenders in which the Mathiesen Group has participated in the preceding quarter and also confirm the existence of the aforesaid file on each.

******* End of Document *******