

Crime Prevention Model Overview

Ultratug

Ultranav

I. Preamble

Ultranav and its subsidiaries confirm their firm commitment to fostering an ethical corporate culture, underpinned by integrity and the promotion of good business practices. This commitment is set out in our Code of Conduct and General Business Principles, which are the highest standards in our internal regulatory system, reflecting our dedication to preserving the value and reputation that the Group has attained throughout its history.

To fully comply with management and supervision obligations, the Group implemented the Crime Prevention Model (hereinafter referred to as the "CPM" or the "Model"). This model is summarised in this document, which provides information, guidance and guiding principles to assure upright and transparent conduct in all our operations, requiring upright, rigorous and diligent conduct by all members and business partners.

The specific objectives of the Crime Prevention Model are to:

- Raise awareness about the risks and consequences to which Ultranav and its subsidiaries are exposed.
- Provide communication channels to prevent crimes from being committed.
- Boost the adoption of effective mitigation action.
- Foster the transversal collaboration and coordination between employees and their stakeholders.
- Provide guidelines to comply with laws and regulations that impact the Group.



II. Scope

Ultranav and its subsidiaries have a Crime Prevention Model that is global, i.e., it includes the owners, directors, representatives, senior management, employees, contractors, consultants, and any other related third party. The Prevention Model shall apply to companies that are part of Ultranav and its subsidiaries, hereinafter referred to as the Group.



III. Legal Framework

The Crime Prevention Model of Ultranav and its subsidiaries was developed based on what is laid down in the applicable and current regulation, which is Law N°20.393. This establishes the criminal liability of bodies corporate, along with its recent modification of Law No21.595 on Economic Crimes, which establishes a broad list of crimes that entail the criminal liability of bodies corporate. This regulation has brought in new categories of economic crimes, in addition to a special system of penalties and consequences for those who commit these unlawful acts.



IV. Crime Prevention Model

The Crime Prevention Model entails establishing an organisational structure, resources, roles and responsibilities, processes and policies, whose purpose is to foster a culture of integrity and good business practices, along with preventing the crimes laid down in Law 20.393 and 21.595 from being committed. Moreover, members of the board of directors, managers, employees, suppliers, consultants and others who act on behalf or representation of Ultranav and its subsidiaries are compelled to comply with the Prevention Model. It is established that it is expressly prohibited to commit or participate in committing any unlawful act, particularly those that might give rise to the criminal liability of the Group.

The efficiency and effectiveness of the CPM greatly depends, among other factors, on the presence of a control environment within the Group, which is robust and responds to the risks which it faces.

The main core elements the Group has put in place as part of the compliance culture and a robust control environment are:

A.

The General Business Principles:

These are the commitment that Ultranav and its subsidiaries have undertaken with stakeholders about how to conduct the business at all times,basedon theGroup'scorporate values and culture. The corporate values are: excellence, passion, integrity and safety.

B.

Code of Conduct:

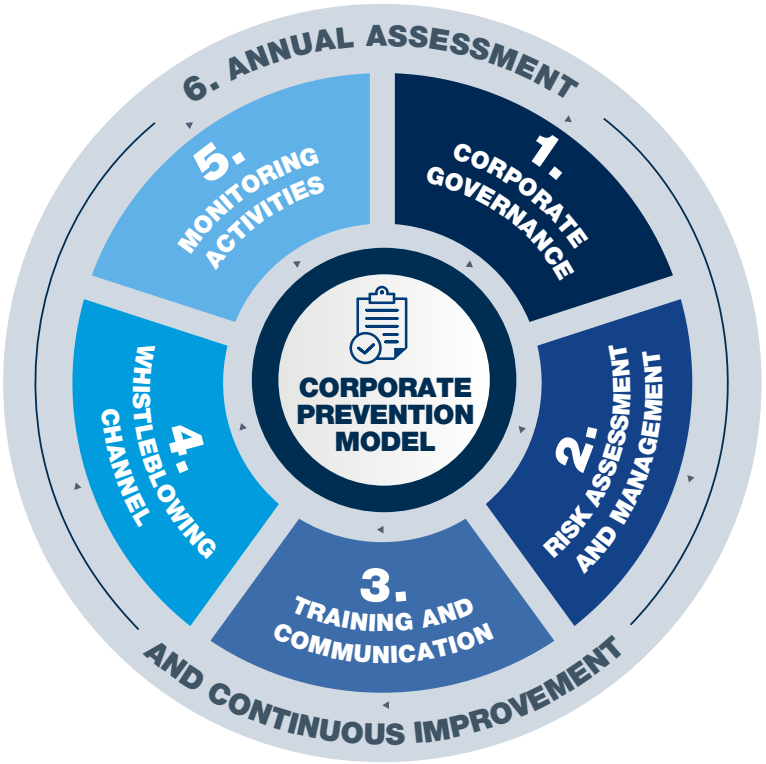
This establishes the internal conduct guidelines which drive and guide the behaviour expected of all employees of the Group in the performance of their daily work and activities, and in the relations and engagement with stakeholders (public and private).

C.

Crime Prevention Model:

Guidelines on how Ultranav and its subsidiaries assure compliance with the legal obligations that affect the ethical principles governing the action of all those who are part of the Group.

The Crime Prevention Model is underpinned by 6 pillars of compliance, which are the tools with which the Group responds to and manages its exposure when any crime is committed. The chart of the pillars is shown below:



Each of these pillars is outlined below:

1. **Corporate governance:** this pillar comprises the management and supervision body of the CPM and the set of standards, principles and procedures regulating the action of all those who are part of Ultranav and its subsidiaries and related third parties. This pillar establishes the relations between the board of directors, management, employees and the rest of the interested parties, besides stipulating the rules and standards governing the compliance decision-making process of the Group.

   Corporate governance comprises a Crime Prevention Committee, which holds ordinary meetings periodically and extraordinary meetings when required.

   An essential part of corporate governance is the regulatory framework, which provides the basis, guidance and methods regarding the compliance culture of Ultranav and its subsidiaries. This regulatory framework is made up of the General Business Principles, Code of Conduct, the Crime Prevention Manual, and the following policies and procedures: Anti- corruption Policy, Conflict of Interest Policy, Public Official Engagement Policy, Due Diligence Procedure, Whistleblowing Report Investigation Procedure, and the Internal Regulation on Order, Hygiene and Safety (RIOHS, according to the Spanish acronym) (CPM chapter).

2. **Risk assessment and management:** this is the risk identification and mapping process and review of controls, involving the leaders of all the business areas, allowing for accurate quantification of the risks by means of analysing the impact and probability of the crime occurring, along with the identification of mitigation controls related to the CPM. This enables the Group to allocate the resources needed to monitor, follow up on and respond when a crime is committed.

3. **Training and communication:** for the efficient implementation of the Prevention Model, it is essential that all employees and business partners know the scopes of the Law, along with the content and scope of the CPM, its controls and regulatory framework. To assure the correct training and dissemination of the model, there is an annual training plan for employees that entails in-person and remote training, and e-learning.





The model is communicated internally by making the policies and procedures of the model available to all employees. For this there are internal communication channels like U Connect, communiqués, among others. External communication (business partners) is made through the Compliance site available on the website of each company. This has an excerpt of the regulatory framework governing the actions of Ultranav and its subsidiaries and access to the Whistleblowing Channel.

4. **Whistleblowing channel:** this is a means of communication with which all interested parties (employees, customers, suppliers, etc.) have a way of alerting and/or informing management about issues concerning irregularities, breaches and/or infringements of the General Business Principles, Code of Conduct, Internal Regulation (RIOHS, according to the Spanish acronym), and the Crime Prevention Model. The Whistleblowing Channel has the following ways of reporting:

   - Personally to the Crime Prevention Officer (CPO) or to any member of the senior management of each company.
   - Email to the Crime Prevention Officer (compliance@ultranav.cl).
   - The Whistleblowing Channel can be accessed from the website of each company.

5. **Monitoring activities:** the Crime Prevention Committee has the responsibility and role of making sure the Model operates, reaches the entire organisation and is effective. For this, the CPO must assure the applicability of the Model by means of internal reviews, self-evaluation questionnaires and the reporting schemes of the support areas with delegated controls.

6. **Annual assessment and continuous improvement:** to comply with the law, once a year the Prevention Model must be reviewed by an independent third party to ensure, bolster and improve all the components of the Crime Prevention Model.

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