

BLUMAR

**CRIME PREVENTION MODEL
FOR BLUMAR AND ITS SUBSIDIARIES,
ACCORDING TO LAW NO. 20,393**

GENERAL

Law No. 20,393 on Criminal Liability of Legal Persons (hereinafter the “Law”) includes a list of offenses that, if certain conditions are met, may result in criminal liability for companies and other entities.

To avoid that the aforementioned offenses are committed during the company’s activity, Blumar S.A. has implemented a Crime Prevention Model (hereinafter “CPM”) which establishes protocols and procedures for this purpose.

Blumar has also identified the most relevant offenses that could be committed in the framework of the company’s activities and processes. These offenses are:

- Submitting false information to or withholding information from the Superintendency of the Environment
- Harm to health and life of individuals
- Environmental damage
- Corruption
- Breach of fishing and aquaculture regulations
- Breach of the Law on Markets

WHAT DOES THE BLUMAR CRIME PREVENTION MODEL INCLUDE?

The model includes a policy, which defines the guidelines on which the adoption, implementation, and operation of the model is based.

On the other hand, it also provides for a procedure that defines the activities included in the Model. Those activities are Prevention, Detection, Response, Supervision, and Monitoring of the Crime Prevention Model.

The CPM also includes the following elements:

- Identify the legal person’s activities or processes that imply risk of criminal conduct.
- Establish protocols and procedures to prevent and detect criminal conduct, which must include safe grievance channels and internal sanctions for non-compliance.
- Assign at least one responsible person for the application of such protocols, who is sufficiently independent, has effective management and supervisory powers and direct access to the administration of the legal entity.
- Provide regular evaluations by independent third parties and improvement and updating mechanisms for the model based on those evaluations.

WHAT ARE THE OBLIGATIONS OF BLUMAR EMPLOYEES IN REGARD TO THE CPM?

- Read, abide by, and comply with the Crime Prevention Model
- Participate in trainings on the Crime Prevention Model
- Act in accordance with the principles and values highlighted and protected by the Crime Prevention Model
- Comply accordingly with the Crime Prevention Policy and Procedure
- Fully comply with the rules and controls established by the company
- Report any violation related to the crime prevention regulations included in the model and use the channels and procedures for doing so.
- Not to participate, either actively or by omission, in conduct prohibited by the guidelines set out in the Crime Prevention Model.

HOW CAN I REPORT VIOLATIONS OF THE CPM?

Grievance channel:

Employees or third parties can file grievances about violations of the Code of Business Conduct and Ethics, regulations, policies, procedures, or additional internal and external standards concerning ethical behavior and the Crime Prevention Model.

The grievance channel is available on the company's website (<http://www.blumar.com>)

Minimum grievance requirements:

- Anonymous grievance or identification of the grievant (optional depending on the case)
- Type of grievance (breaches of the Code of Ethics or the Crime Prevention Model according to Law No. 20,393)
- Details of the grievance
- Attach backup information if it exists, such as photographs, files, or others.

DO EMPLOYEES RISK INTERNAL SANCTIONS IF THEY DON'T COMPLY WITH THE CRIME PREVENTION MODEL?

Measures and sanctions that may be applied will depend on the severity of the breach and will consist of those established in the Internal Hygiene and Safety Standards, or those set out in the contracts with the company's employees, as appropriate.

WHAT ARE THE PENALTIES ESTABLISHED BY LAW FOR A LEGAL PERSON IN CASE OF COMMITTING A CRIME?

- Extinction of the legal person
- Disqualification to contract with the State
- Partial or total loss of tax benefits or absolute prohibition of receiving them
- Publication of an extract of the conviction in the Official Gazette and another national newspaper
- Fines are calculated using the number of day-fines, using the amount set by the court for each day-fine. The maximum fine is 3,000,000 Monthly Tax Units.
- Supervision of the legal person
- The forfeiture of profits

WHAT ARE THE PENALTIES ESTABLISHED BY LAW FOR A NATURAL PERSON IN CASE OF COMMITTING A CRIME?

- Deprivation of liberty
- Fines are calculated using the day-fine corresponding to the degree of the custodial sentence and depending on the average daily net income of the convicted person. The maximum fine is 300 day-fines based on the average daily income of the convicted person.
- Disqualification from exercising public offices
- Disqualification from exercising management positions
- Disqualification to contract with the State

WHO IS RESPONSIBLE FOR IMPLEMENTING THE CRIME PREVENTION MODEL?

As required by law, Blumar's Board of Directors appointed a Compliance Team which is led by the Internal Audit Manager and Compliance Officer, Mr. Ariel Elgueta.

The Blumar Board, the CEO, the Committee on Corporate Affairs, Ethics and Sustainability, and the Compliance Team will be responsible for the adoption, implementation, administration, updating, and supervision of the Crime Prevention Model.