







CRIME PREVENTION MANUAL

DOCUMENT CNX-KILO-000-AC-MAN-I-0004

VERSION 2

 <small>Línea Kimal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 2 de 18

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3		

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 <small>Línea Kímal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 3 de 18

Contenido

1. Objectives	4
2. Scope.....	5
3. Definitions	5
4. Fundamental principles of the Model.....	5
5. Roles and responsibilities	6
5.1 Board of Directors	6
5.2 Management	7
5.3 Responsible party	7
5.3.1 Resources and faculties of the responsible party	8
5.3.2 Responsibilities and functions	8
5.4 Areas supporting the crime prevention model.	10
5.5 Collaborators or third parties.....	10
6. Policy Development.....	10
6.1 Preventive Actions.....	11
6.2 Detection activities.....	12
6.3 Response activities	13
6.4 Model supervision, training, and monitoring activities.	13
6.5 Complaints and investigations	14
6.6 Complaints to the courts.....	14
7. Sanctions.....	15
8. Updates.....	15
9. Effective data	15
10. Annex.....	15

 <small>Linea Kimal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 4 de 18

1. Objectives

In accordance with the provisions of Law No. 20.393, which establishes the criminal liability of legal entities, hereinafter referred to as the “Law”, for the crimes referred to in Article 1 of said Law, which are listed and specified in Annex I of this instrument, hereinafter referred to as the “Annex”. The same Law establishes that **CONEXIÓN KIMAL LO AGUIRRE S.A.**, hereinafter referred to as the “Company,” shall be liable only in those cases where the perpetration of the act has been favored or facilitated by the failure to effectively implement an adequate crime prevention model. The purpose of this instrument is to establish the guidelines on which the adoption, implementation, and operation of the Company’s Crime Prevention Model, hereinafter referred to as the “CPM” or “Model,” are based, in accordance with the provisions of the Law.

Legal entities are liable for such crimes committed within the scope of their activities, by or with the involvement of any natural person who holds a position, role, or office within the entity, or who provides services to the entity by managing its affairs with third parties, with or without its representation. The legal entity shall also be liable when the offense is committed by a natural person who is related in the same terms as above to a legal entity other than the Company, provided that the latter provides services to it by managing its affairs with third parties, with or without representation, or when the latter lacks operational autonomy with respect to the Company.

Consequently, the Company, with the aim of fully complying with its own rules, which are designed to conduct all its business within an ethical framework and in accordance with sound practices, as well as with current legislation, in particular the provisions of Article 4 of the Law, has adopted and implemented this Model. In turn, as required by the aforementioned Law, the Company has defined a Responsible Party (“RP”), under the terms that will be specified below.

This CPM seeks to establish the following key points within the Company:

- i. **Preventing crimes for being committed under the Company’s umbrella:** Preventing the commissions of crimes defined in said law and in other legal bodies that could result in criminal liability for the Company.
- ii. **Identification of key areas:** Identification of activities and processes related to the Company’s economic activities, whether regular or sporadic, where there is a risk of committing crimes defined in the law.
- iii. **Prevention mechanisms:** Establish specific protocols, rules, and procedures that allow our employees, or third parties involved in our activities, to plan and carry out their tasks in order to prevent the occurrence of crimes covered by the aforementioned laws.
- iv. **Supervise resource management:** Establish resource management and audit procedures to prevent their use in the commission of crimes for which the Company may be criminally liable.
- v. **Reporting and investigation procedures:** Establish reporting channels or whatever procedures are appropriate to determine the possible attribution of responsibility against people who violate the CPM and other internal Company regulations.

 <small>Línea Kimal - Lo Aiguine</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 5 de 18

- vi. **Internal communication:** Communicate internal regulations on CPM to the different members of the Company, for example, by incorporating them into employment contracts and contracts with suppliers.
- vii. **Supervision and continuous improvement:** Establish methods for the effective implementation of the CPM, seek to identify and correct deficiencies in its implementation, and implement changes in the circumstances affecting the Company.
- viii. **Organizational culture:** Promote and disseminate within the Company an organizational culture oriented toward transparency and collaboration in crime prevention.

2. Scope

This CMP policy is for the sole and exclusive use of the Company.

The scope of this instrument is corporate nature, which includes Boards of Directors, Senior Executives, Representatives, Collaborators, Employees, Contractors, and Advisors of the Company.

3. Definitions

Code of Ethics: A guide that promotes conduct characterized by integrity and honesty among employees, regardless of their hierarchical rank.

Sanction: Consequences imposed by a law, rule, or regulation, in this case, the Crime Prevention Model or any of its associated controls, on violators for noncompliance with its provisions.

Third parties or Advisors: Any natural or legal person who provides any type of professional service, support, and/or commercial relationship with the Company under public or private law.

Crimes: Those established in the first article of the Law, which are defined and listed in the Annex of the present instrument.

Responsible Party: The person designated by the Board of Directors, who is responsible for promoting the Company's ethical conduct, implementing and managing the CPM, and monitoring the progress of complaints submitted through the various channels provided by the Company.

4. Fundamental principles of the Model

- i. The Company will continue to ensure that it maintains an appropriate organizational, administrative, and supervisory model for the prevention of crimes covered by the Law and all its amending laws, known as the "Company Crime Prevention Model."
- ii. Through the Model, the prevention of crimes contained in Article 1 of the Law, and others that may be incorporated in the future, will be promoted.

 <small>Linea Kimal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 6 de 18

- iii. In view of the above, the Company's Directors, Executives, Collaborators, and Employees, as well as third parties associated with, whether suppliers, contractors, advisors, agents, clients, or other, are expressly prohibited from engaging in any act that may constitute a crime or any conduct that may give rise to criminal charges against the Company.
- iv. The application and enforcement of the rules established in the Model is the responsibility of the Responsible Party, who shall have the necessary autonomy to perform their duties, under the terms established in Article 4, No. 3 of the Law. The Responsible Party is appointed by the Company's Board of Directors for a term of up to three years, which may be extended for periods of equal duration.
- v. The Board of Directors, the Management, and the Responsible Party of the Company are jointly responsible for the adoption, implementation, administration, updating, and supervision of the Crime Prevention Model.
- vi. The Board of Directors shall provide the Responsible Party with the resources and powers to perform their duties and activities, including the resources and material means to perform their tasks adequately. The approval of these resources must be formalized in the corresponding Board minutes.
- vii. The Responsible Party has access to information related to its scope of action and to the Company's Administration, in order to report to the management of the Crime Prevention Model to the Board of Directors, at least every six months and / or when the circumstances of the entity so warrant.
- viii. The Responsible Party shall disseminate and communicate to all employees the Company's Crime Prevention Model, the roles and responsibilities that arise from it, and the penalties for non-compliance.
- ix. The Company will ensure compliance with all applicable laws and regulations, and procedures relating to the crimes indicated in the Law and its amending laws.
- x. The Crime Prevention Model will be updated when relevant changes occur in business conditions, or changes associated with the Law and the activity for which the Responsible Party will be responsible.

5. Roles and responsibilities

5.1 Board of Directors

The Board of Directors (or senior management of the Company) is primarily responsible for ensuring the correct implementation and effective operation of the CPM. It is also the body responsible for appointing the SR, ratifying and extending his or her term of office, and defining the means and powers necessary for him or her to perform his or her duties.

The specific functions shall be:

 <small>Linea Kimal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 7 de 18

- i. In compliance with the provisions of the Law, it is possible to both appoint and dismiss the RP from his/her position. Likewise, the Board of Directors has the power to validate and extend this appointment every three years.
- ii. The RP must have the essential tools and resources to effectively perform his duties and responsibilities.
- iii. Approve or ratify the Crime Prevention Model.
- iv. Ensuring the proper implementation and efficient operation of the Crime Prevention Model is imperative.
- v. Obligation to receive, evaluate, and supervise the CPM's management and operating reports, which are prepared by the RP at least every six months or once a year.
- vi. Inform the RP of any situation observed that is related to non-compliance with the Law and CPM's operation.

5.2 Management

The Company's various management teams play a fundamental role in supporting and assisting the SR in implementing the CPM. Without their commitment, collaboration, and proactivity, crime prevention controls cannot be successful.

In particular, the Company's management teams must:

- i. Ensure the correct implementation and effective operation of the CPM.
- ii. Provide the necessary information for the RP to perform its duties in relation to the implementation, operation, and effectiveness of the CPM.
- iii. Inform the RP of any situation observed that involves non-compliance with the Law and procedures related to the CPM.
- iv. Provide the RP with the information and means necessary to prepare appropriate reports on the management and operation of the CPM.
- v. Support the RP by ensuring unrestricted access to information and people, as well as coordinating the activities of the CPM in the areas required.
- vi. Implement the control activities established to mitigate the identified risks and inform the RP of any new risks identified.

5.3 Responsible party

An official who has been appointed by the Company's Board of Directors to manage, supervise, and implement this Crime Prevention Model.

	CRIME PREVENTION MANUAL		Code	CNX-KILO-000-MAN-I-0004
			Version	2
			Date	November 2024
			Page	Página 8 de 18

The RP's mission is to embody the Company's core values through their actions. To fulfill this mission, it is essential that the person occupying this position has an impeccable character, as well as a thorough understanding of the responsibilities and functions of each area of the organization.

They must also be familiar with the relevant legislation and regulations issued by the regulatory authorities, as well as the Internal Regulations on Order, Hygiene, and Safety, the Crime Prevention Model, and all the Company's internal policies, protocols, and procedures.

5.3.1 Resources and faculties of the responsible party

The Responsible Party, in exercising their powers, shall have:

- i. Management and supervisory powers, in order to carry out his/her responsibilities within the organization.
- ii. Autonomy in relation to other management teams, allowing him/her to access and report directly to the Board of Directors and the CEO to report on their findings and be accountable to their management.
- iii. Budgetary resources allocated in an adequate annual budget of their own, intended to carry out CPM compliance reviews, as well as perform audits and improvements, as necessary.
- iv. Full access to all information necessary to perform its functions effectively.
- v. Necessary and adequate physical infrastructure to perform its work correctly and maintain the confidentiality of its findings.
- vi. Sufficient technological infrastructure to carry out its tasks, with an elevated level of physical and logical network security to safeguard the confidentiality of information.
- vii. Trained, competent, and experienced staff adequately fulfil their functions and responsibilities.

5.3.2 Responsibilities and functions

The RP is responsible for implementing, monitoring, and controlling the proper functioning of the Company's Crime Prevention Model in order to detect and correct potential deficiencies and update it in accordance with changes in the organization's external and internal environment.

He or she shall have adequate independence, effective management and supervisory powers, and direct access to the Company's management.

The responsibilities and functions of the RP consist of:

- i. Request the necessary resources and powers from the Board of Directors to perform their duties. They will be responsible for implementing the Crime Prevention Model in accordance with Company policies.

 <small>Linea Kimal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 9 de 18

- ii. Developing and exercising the role of Responsible Party as established by law and conducting training at least once a year for all staff on the Crime Prevention Model and the scope of the law.
- iii. Developing and implementing an outreach program, educational resources, and training for the target audience, in order to ensure understanding and familiarity with prohibited conducts and criminal regulations, including an induction program for new staff.
- iv. Report on its management to the Board of Directors at least every six months and/or when circumstances warrant, either on its own initiative or at the request of said body, informing through the means deemed most appropriate of the measures and plans implemented in the performance of its functions.
- v. Direct and supervise the identification of activities or processes that generate a risk of crime.
- vi. Maintain an updated list of activities that pose a risk of crime, contained in the so-called “Crime Risk Matrix” that forms an integral part of the Model.
- vii. Be the recipient of any reports of non-compliance with the Crime Prevention Model or the commission of illegal acts and manage the corresponding investigations when there is a report or a suspicious situation that warrants it.
- viii. Request all documentation and background information related to the reported act or operation; and safeguard evidence related to crime prevention activities.
- ix. Participate, if applicable, in lawsuits, complaints, or legal proceedings undertaken by the Company in relation to crimes covered by the Law, providing the background information that it maintains or is aware of by virtue of its position.
- x. Report on the status of complaints received related to the CPM to the Board of Directors on a semi-annual basis, if any.
- xi. Supervise the existence of complaint procedures and ensure compliance with them, as well as supervise the application of internal sanctions.
- xii. Initiate internal investigations within the organization for acts perpetrated by people who hold any office, function, or position or manage affairs, to the extent that they may involve the commission of a crime established by law.
- xiii. Resolve queries related to any aspect of the Crime Prevention Model.
- xiv. Propose to the Board of Directors any other policy and/or procedure deemed necessary to complement the existing Crime Prevention Model.
- xv. Ensure that the Crime Prevention Model, and any other internal policy or procedure, is updated in accordance with regulatory changes and the results of its implementation.
- xvi. Perform special tasks entrusted to it by the Board of Directors in relation to matters within its competence.

 <small>Linea Kimal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 10 de 18

- xvii.** The Responsible Party may, at any stage, hire the services of external auditors, lawyers, or other specialized people to support the investigation and analysis of matters. In addition, it may always request the collaboration of any executive or other collaborator to analyze, investigate, or resolve complaints.
- xviii.** Hire independent third parties to evaluate the Crime Prevention Model as a whole and/or by modules.
- xix.** Propose effective mitigation measures to prevent the recurrence of a crime, if applicable.
- xx.** Any other duties inherent to the nature of their position.

5.4 Areas supporting the crime prevention model.

The key features of the Crime Prevention Model are as follows:

- i.** General Management
- ii.** Human Resources Department
- iii.** Legal Department
- iv.** Administration and Finance Department
- v.** Operations Department
- vi.** IT Department
- vii.** Environment, Communities, and Corporate Reputation Department.

These areas must support the Responsible Party in its mission and report every six months on the status of compliance associated with the respective areas:

- i.** Events or incidents.
- ii.** Detection of new risks.
- iii.** Effectiveness of controls and identification of opportunities for improvement.
- iv.** Resolution of questions or queries raised in their area.

5.5 Collaborators or third parties

- i.** Comply with the provisions of this CPM, the Code of Ethics, and the Company's Internal Regulations on Hygiene, Order and Safety.
- ii.** Report, through the channels defined for this purpose, any situations that may contravene the provisions of this Model.

6. Policy Development

The CPM will be developed through a series of activities aimed at supporting its operation and implementation, which are the responsibility of the Responsible Party and are classified as follows:

 <small>Línea Kímal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 11 de 18

6.1 Preventive Actions

Effective prevention helps to avoid misconduct or omissions from the outset. The objective of preventive measures is to prevent violations of the CPM and prevent the commission of crimes provided for in the Law.

i. Internal Regulations on Order, Hygiene, and Safety.

In compliance with Article 4 of the Law, the Company's Internal Regulations on Order, Hygiene, and Safety must incorporate internal obligations, prohibitions, and sanctions in relation to the crimes provided for in the Law.

ii. Corporate policies.

The Company shall establish guidelines and procedures in its policies aimed at achieving the objectives pursued with the adoption of the CPM. These policies shall be binding on all Company employees and shall apply to third parties related to the Company, to the extent that this is possible and legally enforceable.

The policies will guide the actions of those to whom they apply, recognize conflicts or possible irregularities, prevent prohibited conduct when it is evident, and support the search for advice when the circumstances themselves do not allow for an immediate conclusion that an irregular situation exists.

iii. Contract clauses.

These clauses must be included in an annex to employment contracts signed prior to the implementation of the CPM and incorporated into employment contract forms going forward.

In accordance with the provisions of Article 4 of the Law, it shall form an integral part of the employment contracts entered into by the Company with its employees and shall extend to all contracts entered into by the company with contractors, service providers, or other similar persons, containing the obligations, prohibitions, and penalties contained in said Law, hereinafter referred to as the "Compliance Clauses."

Therefore, said contract must consider the provisions, obligations, and prohibitions related to the aforementioned law.

The express acceptance by the Company's counterparty of the Company's Compliance Clauses is an essential requirement for the execution and conclusion of the respective contract.

iv. Communication and training.

It is important that all Company employees are aware of the scope of the Law, and therefore the Responsible Party must ensure:

- i. Effective communication of the CPM policies and procedures, involving all levels of the organization, including the highest administrative authorities and the Board of Directors. A

 <small>Linea Kimal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 12 de 18

record of those attending training sessions must be kept, and this information must be included in the report.

- ii. The inclusion of CPM matters and associated crimes in the Company's induction programs and training plan.
- iii. The provision of regular training on:
 - a) The crime prevention model and its main components.
 - b) Law No. 20.393 on the Criminal Liability of Legal Entities.

v. Risk Matrix and Audit

The Responsible Subject is the person in charge of the process of identifying and analyzing the risks of commission of crimes. This process must be conducted annually or whenever significant changes occur to the Company's conditions.

To carry out this activity, the following must be done:

- a. Identify and evaluate risks.
- b. Identify and evaluate controls.
- c. Establishment of mitigation measures in the event of non-compliance.

The risk identification and analysis process will be documented in the Company's Crime Risk Matrix.

6.2 Detection activities

The objective of these activities is to take action to identify any non-compliance with the CPM and the possible commission of crimes provided for in this law.

The CPM's detection activities include, among others, the following:

i. Continuous Monitoring

The controls in force in the Crime Prevention Model will be monitored, with a particular focus on priority processes with greater exposure or reputational impact.

The results of the monitoring will be reported to the Company's Board of Directors, highlighting the degree of compliance of each process. If necessary, any observations detected, and the corresponding action plans will be included.

ii. Whistleblowing and consulting channel

The Company has an additional communication channel, which is confidential and anonymous, so that anyone who has information about an act or event that constitutes a violation of the Law and its amending laws, or conduct that deviates from the principles established in the Company's Code of

 <small>Línea Kimal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 13 de 18

Ethics, by its personnel or by entities that have relations with it, can report it directly to the Responsible Party.

The whistleblowing and consulting channel is anonymous and confidential so that employees, suppliers, service providers, contractors, and interested third parties can communicate or report violations of the Model, Code of Ethics, and current legislation.

The accesses of this channel are:

- CONEXIÓN's Intranet
- CONEXIÓN's website

The channel is designed to report possible risks and breaches of the CPM and refers to current labor regulations to adequately sanction violations of the control and organizational measures established in this Model. The operation of this channel complies with the requirements of the Law.

Employees and third parties who have evidence or suspicions of the commission of a crime, or of a violation of any of the expected behaviors recognized in the CPM, Policies, and/or internal Procedures of the Company, must report it to the RP through this channel.

However, in the event of a verbal or written complaint made directly to management, Human Resources, or another superior, a complaint must be made to the Responsible Party.

6.3 Response activities

The objective of response activities is to develop corrective actions, resolutions, disciplinary measures, and/or sanctions against those who violate the CPM or find evidence of a crime under the Law. As part of the response activities, a review of the violated control activities should be considered, with the aim of strengthening them or replacing them with new and effective control activities.

CPM response activities include, among others:

- i. Evaluation, investigation, and resolution of complaints.
- ii. Sanctions and disciplinary measures.
- iii. Reports to the authorities, as appropriate.
- iv. Developing measures to contain situations that may involve non-compliance with the Law.

6.4 Model supervision, training, and monitoring activities.

Through compliance monitoring (or auditing), the Responsible Party or its designee must periodically verify that the CPM controls are functioning as designed.

- i. The Responsible Party, or whoever he/she designates, must audit and supervise the proper performance of detection, prevention, and related procedures.

 <small>Linea Kimal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 14 de 18

- ii. If any non-compliance is detected, it must be reviewed and analyzed to determine what allowed any of the described crimes to occur, identify whether there were sufficient and/or effective controls, and, if so, which controls failed within the process.
- iii. The Responsible Party must access the record of complaints and investigations in which evidence of non-compliance or violations related to the crimes indicated in the Law has been detected.

Among others, the following activities, measures, or supervisory and/or monitoring controls may be considered:

- a. Scheduled supervision and/or monitoring of the functioning of the Anti-Money Laundering and Counter-Terrorist Financing System.
- b. Supervision and/or monitoring of controls that operate on the most critical warning signals.

Supervision, training, and follow-up activities will be carried out not only on the dates determined for this purpose, but also in the context of different circumstances (such as Company needs, detected conditions, changes in internal processes, among others), as warranted.

In accordance with its mandate, the Responsible Party may request the intervention of support areas within the organization to conduct surveillance activities, provided that such areas are not involved in the activity under investigation.

The Crime Prevention Model must be updated by conducting an annual evaluation of its design and operational effectiveness.

6.5 Complaints and investigations

According to the Law, the Responsible Party is obliged to coordinate and lead investigations arising from complaints that have an impact on the CPM or are related to the presumption of a crime.

6.6 Complaints to the courts

Upon detection of an act with characteristics of a crime, the Responsible Party shall evaluate, together with the Board of Directors and the Company's Management, the possibility of filing a complaint with the Courts of Justice, the Public Prosecutor's Office, or the Police.

This action is specified as a mitigating circumstance of the criminal liability that could be incurred by the legal entity in Article 6 of the Law, which states that:

"It shall be understood that the legal entity is cooperating substantially when, at any stage of the investigation or legal proceedings, its legal representatives have, before knowing that the legal proceedings are directed against it, brought the punishable act to the attention of the authorities or provided information to establish the facts under investigation."

 <small>Línea Kimal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 15 de 18

7. Sanctions

All members of the Company must clearly understand the content of this Model and must always abide by its guidelines. The Responsible Party will monitor compliance with this instrument and implement verification programs.

Failure by employees or members of the Company to comply with the terms of this Model and the Company's Policies may be subject to the sanctions established in the Company's internal instruments, such as the Internal Health and Safety Regulations, Code of Ethics, among others, as well as those indicated in current legal regulations.

8. Updates

This manual must be approved by the Company's Board of Directors and will be continuously monitored and reviewed annually, starting from its effective date, by the Responsible Party, who propose any necessary changes in form and substance.

9. Effective data

This manual is effective as of September 2024 and will remain in force indefinitely or until the Board of Directors, duly authorized, establishes otherwise.

10. Annex

Annex 01: Groups of Crimes Law No. 20.393.

- Crimes Against Economic Public Order.** This group of crimes undermines the proper functioning of the market and the economic order itself. In this context, serious anti-competitive practices such as collusion or price manipulation are subject to criminal penalties.
- Bankruptcy crimes.** This group of crimes undermines good faith in contractual relationships, but mainly means a reduction in the debtor's assets, so that the creditor is frustrated in their attempt to obtain payment of their credit due to the debtor's malicious actions, currently being in liquidation or, prior to this, knowing the poor state of the business.
- Crimes against Public Faith.** Crimes against public faith are those that undermine the veracity of information, consisting of crimes of falsification of instruments, whether private or public. These types of crimes undermine one or more of the functions of documents in legal transactions, namely perpetuation, guarantee, and proof.
- Crimes in Banking and Insurance.** Participation in the banking and insurance industry without the required registrations and permits is punishable by law. This module also covers a series

 <small>Linea Kimal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 16 de 18

of illegal acts that undermine confidence in and the proper functioning of the financial and insurance system. It includes crimes such as providing false information to the Central Bank of Chile, as well as any incorrect data related to international exchange transactions. It addresses the falsification of letters of credit, which undermines the authenticity and trustworthiness of the documents used for credit. Malicious credit obtaining, which involves obtaining financing through deceptive or fraudulent means, is also part of this module. It includes the fraudulent issuance of checks, where there is an intention to defraud by issuing checks without funds or with false information.

5. Crimes against property. Crimes against property are those that threaten the integrity of property, causing harm to the victim. These crimes consist of fraud through deception and/or breach of trust.

6. Crimes against the Environment. Crimes against the environment can be classified as:

- i. General Environmental Crimes, which are those that threaten the integrity of the environment itself, such as the right of people to live in an environment free of pollution. The environment can be affected by pollution that seriously affects the sea, air, or land. These types of crimes can also be committed by dumping or releasing, even negligently, polluting substances.
- ii. Crimes against environmental institutions, for example, when maliciously false information is provided to regulatory authorities or attempts are made to avoid such regulation in any way.
- iii. Sectoral environmental crimes contained in specific laws such as the Forestry Law, Fisheries Law, REP Law, National Monuments Law, Hunting Law, and International Trade in Endangered Species of Wild Fauna and Flora Law, among others.

7. Crimes against the Public Administration. These crimes are related to public administration, most of which are crimes relevant to public officials. The relevant criminal behavior is the bribery of a public official, whether national or foreign. Bribery consists of any offer or acceptance to provide any benefit in exchange for an undue service from a public official.

For these purposes, a public official is understood to be anyone who holds a public office or position, whether in the central administration or in semi-fiscal, municipal, or autonomous institutions or companies, or in agencies created by or dependent on the State, even if they are not appointed by the Head of State or receive a salary from the State. The fact that the position is elected by popular vote shall not prevent this classification.

8. Crimes against Intellectual and Industrial Property. Crimes against intellectual and industrial property protect individual assets, safeguarding the rights that arise from certain creations or innovations. The conduct punished by this type of crime consists of the unauthorized exploitation of this type of property. Examples of this are the misuse of trademarks or distinctive signs to take advantage of the prestige they convey.

9. Tax and Customs Offenses. These correspond to malicious violations of tax regulations aimed at tax evasion, for example, malicious omissions in the returns filed that serve as the

 <small>Linea Kimal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 17 de 18

basis for determining taxes. Specific behaviors that may lead to this group of crimes include maliciously false or incomplete returns that may result in a lower tax assessment than is appropriate; increasing the tax credit on any withholding tax; simulations intended to obtain fraudulent tax refunds; providing false information to tax authorities; among other behaviors that violate tax regulations.

10. Computer Crimes. Computer crimes threaten the integrity of computer systems. Punishing conduct that tends to access, manipulate, alter, or abusively destroy these systems, as well as the information contained therein. The receipt of computer data originating from any of the conduct punished by Law No. 21.459 will also be punished.

11. Crimes against Social Security and Personal Integrity. Labor crimes seek to protect the rights of workers through criminal law. Within this class of crimes, we must consider those related to social security contributions of the workers, workers' remuneration, and their physical and mental integrity. These crimes include:

- i. Payment and withholding of contributions: An employer who, without the employee's consent, fails to withhold or pay an employee's social security contributions or declares a taxable or gross income lower than the actual amount, thereby reducing the number of contributions, shall be punished. This offense would be committed if the department responsible for the company's employee compensation diverted part of the funds collected for social security contributions, thereby reducing the employees' compensation.
- ii. Individual safety of people: This consists of threats to which a worker may be subjected, such as crimes against persons through reckless negligence without malice, such as severe injury.
- iii. Workers' wages: The payment of disproportionate wages below the minimum monthly income is punishable, seriously abusing the worker's situation of need, inexperience, or inability to discern. In this regard, if a company that hires foreign workers who do not speak Spanish pays a wage below the legal minimum, in a manner that is manifestly disproportionate to the wage it pays to Chilean workers performing the same activity, it would be committing a crime.
- iv. Negligence against people: crimes committed through reckless disregard or culpable negligence (in the case of doctors and pharmacists, for example). Thus, crimes such as homicide, mutilation, castration, serious and less serious injuries, among others, will be punished.

12. Crimes against public health. This group seeks to protect the health, physical integrity, and property of the general population.

13. Regulatory crimes. This module includes other crimes involving regulatory violations, such as telecommunications crimes or crimes against the General Urban Planning Law.

14. Corporate crimes. These are crimes that threaten the social interests of corporations and their shareholders. Punishable conduct is precisely that which seeks to abusively harm these interests and is committed in the context of the administration of the company. Among the crimes included in

 <small>Linea Kimal - Lo Aguirre</small>	CRIME PREVENTION MANUAL	Code	CNX-KILO-000-MAN-I-0004
		Version	2
		Date	November 2024
		Page	Página 18 de 18

this group are providing or approving false information about the corporation regarding relevant aspects of its financial, legal, or patrimonial situation, as well as abusive agreements to the detriment of minority shareholders in corporations.

15. Crimes against the Securities Market and other financial crimes. Crimes against the securities market undermine the proper functioning of the market in which publicly traded securities are traded. The key factor in relation to these crimes is information. There are multiple crimes aimed at punishing or repressing conduct that involve taking advantage of information about such securities, their issuers, or businesses in the context of transactions with those securities, or even the cancellation or modification of orders on such instruments. In turn, acts that seek to evade the supervision of the Financial Market Commission are also punishable.

16. Money laundering and receiving stolen offenses as exhaustion, and other special offenses. These are special offenses that occur after the commission of a crime and tend to exhaust the commission of that crime.

The crime of money laundering described in Article 27 of Law No. 19,913 is committed by those who: a) in any way conceal or disguise the illicit origin of certain assets, knowing that they derive, directly or indirectly, from the commission of criminal acts; b) directly conceal such assets; or c) use them for profit; in all cases, knowing or having reason to know the illicit origin of such money or assets.

The acts constituting crimes that may be a potential source of the assets whose origin is being concealed or laundered may come from illicit drug trafficking, terrorism, arms trafficking, financial statement fraud, obtaining bank loans by presenting false information, embezzlement of public funds, tax fraud, intellectual property crimes, child abduction, production of child pornography, human trafficking, and migrant smuggling, among other offenses.

Terrorist financing is defined in Article 8 of Law No. 18,314 as acts committed by a person who deliberately provides or collects funds by any means, directly or indirectly, with the unlawful intention that they be used, or knowing that they will be used, in whole or in part, to commit an act or acts of terrorism by a terrorist organization or by a terrorist.

Finally, there is the crime of receiving stolen goods, which punishes anyone who, knowing its origin or unable to avoid knowing it, has in their possession, for any reason, goods that have been stolen, robbed, or subject to cattle rustling (theft or robbery of animals), receiving stolen goods, or misappropriation, and transports, buys, sells, transforms, or markets them in any way, even if they have already disposed of them.











CNX-KILO-000-AC-MAN-I-0004-EN_Crime_Prevention_Manual


Final Audit Report

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