

SUINCO S.A.

DEPARTMENT OF SAFETY AND OCCUPATIONAL HEALTH

CRIME PREVENTION MODEL  
COMPLAINT PROCEDURE

Revision No.	Object of Revision	Date
00	Issued for Comments	June 30, 2020

## 1. OBJECTIVE

Establish a procedure for the realization, reception and treatment of complaints about possible cases, situations or practices of non-compliance with the provisions of the Crime Prevention Model ("MPD").

## 2. REACH

This procedure is applicable to all the personnel of SUINCO S.A., as well as to third parties that interact with the company, such as suppliers, clients or consultants ("Third Parties").

## 3.- PROTECTION OF COMPLAINTS

No executive, director or other worker or member of SUINCO S.A. may retaliate against any person who has made a complaint regarding the crimes set forth in Law No. 20,393. Any act of harassment or retaliation will be cause for investigation.

## 4.- PROCEDURE

All those who work at SUINCO S.A. They have the obligation to apply and respect the measures that are imparted in order to maintain an environment of prevention of situations of non-compliance with the MPD, as well as to apply and comply with the sanctions that are imposed pursuant to Law No. 20,393 and the Regulations. Internal Hygiene and Safety and Code of Conduct and Professional Ethics of SUINCO SA.

In compliance with the mandate established in letter d) of numeral 3) of article 4 of Law No. 20,393, the following procedure for reporting acts that could constitute breaches of the crime prevention system regulated in the MPD is established:

### a) Complaint Channels

Any person who becomes aware of the existence of an irregular situation with respect to what is established by the MPD and / or Law No. 20,393, may denounce such situation personally or anonymously through the following channels:

Email addressed to the General Manager: [rlb@suinco.cl](mailto:rlb@suinco.cl).

Via telephone or in person with the EPD, Headquarters: Lago Llanquihue 0491

Web portal [www.suinco.cl](http://www.suinco.cl)

SUINCO S.A. personnel, including its executives, directors and workers, will have the obligation to report the facts that could constitute violations of the MPD or Law No. 20,393, and that are brought to their attention.

b) Minimum content of the complaint

The complainant must specify at least the following:

Accurately record your complaint.

If you make the complaint through the complaints channel via the internet (website), declare that you have read and accept the terms and conditions for the formulation of the complaint.

Select the company involved in the complaint, that is, SUINCO S.A.

If you want to remain anonymous.

If you identify the people involved in the incident or infraction, you must indicate the name, surname and position or area in which you work.

c) Treatment of complaints

Once the complaint is received, the person in charge of crime prevention will have a period of 30 calendar days to respond to the complainant, being empowered to interact with him in order to gather the necessary information to give an adequate and timely course to the complaint.

If the information provided by the complainant evidences any infraction of the MPD and / or Law No. 20,393, the person in charge of prevention will initiate the investigation process.

The investigation process must consider at least the following activities by the Prevention Officer:

Gather information about the reported fact.

Interview the personnel involved in the complaint.

Analyze the information obtained through the collection and sustained interviews.

Document the research carried out (procedures and tests carried out) and the results obtained.

Conclude about the research carried out.

Corrective measures that can be recommended.

The entire investigation process will be duly supported by the Prevention Officer. Once the EPD has completed the investigation stage, it will choose one of the following actions:

Resolve that the complaint is not a crime or infraction of the MPD.

Immediately present the information to the General Management of Suinco S.A., as appropriate, which will decide whether it is worth calling the respective board to resolve.

Present the information in the next SUINCO S.A. directory session, to resolve.

In the event that the complaint is resolved as constituting a crime, the EPD will issue a report detailing the facts constituting an offense against the MPD.

The sanctions to be applied will be determined by the person in charge of prevention together with the board or chairman of the board of the corresponding company.

#### d) Follow-up of complaints

The EPD will be responsible for maintaining a centralized record of all complaints received. Each complaint must have