

# CRIME PREVENTION MODEL





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## **TITLE I**

# **SCOPE OF APPLICATION**

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### ***Art. 1 - Purpose of the Model.***

The purpose of this Crime Prevention Model (hereinafter, the Model) has been implemented for the following purpose: organizational, administrative, and supervisory system. This has an objective aimed to prevent, investigate, and potentially sanctioned the commission of crimes. The crimes for which a legal entity may be held criminally liable under this law include the following:

- a. Crimes referred to in Articles 1, 2, 3, and 4 of the Economic Crimes Law, whether classified as economic crimes under that law.
- b. Crimes provided for in Article 8 of Law No. 18.314, which defines terrorist conduct and establishes its penalties; in Title II of Law No. 17.798, concerning Arms Control; and in Articles 411 quater, 448 septies, and 448 octies of the Penal Code. Additionally, this includes any other crimes that may fall under Article 1 of Law No. 20.393 or other laws establishing the criminal liability of legal entities, as well as other offenses that may be included in the matrix of legal risks.

### ***Art. 2 - Scope of the Model.***

The provisions of this Model are binding and mandatory for all individuals who collaborate, provide services, or act on behalf of Comercial e Industrial Plásticos Hoffens S.A. (hereinafter, interchangeably referred to as the Company or Hoffens) in dealings with third parties, regardless of the legal title or qualification under which they perform their duties, whether within the territory of the Republic or abroad. The content of this document applies directly to the Company and without prejudice to extend it as pertinent to its current or future affiliates.

## **TITLE II**

# **COMPLIANCE OFFICER OR CRIME PREVENTION OFFICER (CPO)**

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### ***Art. 3 - Compliance Officer or Crime Prevention Officer (CPO).***

An individual will be appointed to operate within the Company, tasked with implementing and adapting the administrative and supervisory model referred to this Model. The position of the CPO must maintain complete autonomy to ensure the efficiency and transparency of the Model. Additionally, the CPO will perform key functions, including conducting internal audits related to the Model's compliance and interacting with external entities to ensure the organization's practices align with crime prevention standards and regulations.

### ***Art. 4 - Designation.***

The CPO shall be designated by the managing partner of the Company and shall hold the position for a term of two years. This term may be extended for successive periods of equal duration as deemed appropriate.

### ***Art. 5 - Requirements.***

The CPO must be a natural person, of legal age, with full capacity to manage their assets, and must not have been convicted of crimes punishable by severe penalties.

To perform their duties, the CPO must have autonomy from the management of the legal entity, its owners, partners, shareholders, or controllers.

### ***Art. 6 - Obligations of the CPO.***

The CPO is responsible for ensuring strict compliance with all provisions established in this Model. Their specific obligations include:

- a. The CPO must foster good practices within the Company, ensure adherence to this Model, and uphold the Company's Code of Ethics. This includes ensuring that all employees, collaborators, individuals under the direct supervision or direction of the Company, and service providers are informed about the ethical standards and safeguards required for crime prevention. The CPO must actively promote the effective understanding of these documents among all relevant personnel, regardless of additional guidelines provided by the Company's management.
- b. Determine the activities considered high-risk within the context of this Model.
- c. Preserve strict confidentiality regarding any Company information accessed during the performance of their duties.
- d. Execute all necessary measures and plans identified as essential for crime prevention.
- e. Create and implement a training plan aimed at disseminating the Model and its various components. This includes an Annual Training Plan for all actors involved in the Model and its procedures, as well as onboarding training for new employees.
- f. Inform the Ethics Committee of any incidents known during the exercise of their duties that constitute violations of this Model, its complementary documents, or crimes as defined in Article 1 of Law No. 20.393. Additionally, the CPO must immediately notify the President of the Company of any criminal acts for appropriate legal action.
- g. Regularly review and update the Model to adapt to legal or operational changes, ensuring compliance with current regulations and requirements.
- h. Encourage suppliers, contractors, and other stakeholders to adhere to this Model if they lack their own. If third parties already have a prevention model, the CPO must review it to ensure alignment with Hoffens' standards.
- i. Collaborate in internal and external audits related to compliance with the Model, providing all necessary information to facilitate the auditing process.
- j. Establish procedures to identify and address potential conflicts of interest within the workplace, ensuring that collaborators declare any situations that could affect their ability to act in the Company's best interests.

### ***Art. 7 - Means and Powers.***

This article establishes the resources and powers the CPO requires to effectively fulfill their responsibilities under this Model, ensuring their autonomy and access to relevant information for risk management.

- a. **Resources and Budget:** The CPO will have the necessary resources and materials to adequately perform their duties. These will be approved through an annual budget and managed via an independent accounting account, subject to reporting only to the Board of Directors or its designated representative for such purposes.

- b. Access to Information:** The CPO is authorized to request from the Company's management all relevant information necessary to fulfill their objectives, including accounting documents, files, financial statements, records, and similar materials.
- c. Direct Access to the Board of Directors:** The CPO will have direct access to the Board of Directors to inform them promptly, through any appropriate and effective means, of the measures and plans implemented in compliance with their mandate and/or upon receiving a report or complaint.
- d. Information Requests:** Requests for information made by the CPO must be submitted in writing or through any means deemed appropriate. These requests must be addressed and fulfilled promptly.
- e. Sanctions for Non-Compliance:** Non-compliance with this article may result in the imposition of sanctions as outlined in Title IV.

### ***Art. 8 - Reporting Obligations.***

The CPO must submit a semi-annual management report to the Company's Board of Directors. Depending on the activities conducted, the report may include the following items:

- a. summary of investigations conducted during the reporting period.
- b. Identification of activities deemed risky.
- c. A log of complaints related to violations or non-compliance with the Model, along with the results of investigations and any sanctions imposed.
- d. Details on the performance and effectiveness of the Crime Prevention System.
- e. Any other information relevant to crime prevention.
- f. The report will be presented in January and July of each year. However, alternative dates may be agreed upon with the management for justified reasons. In fulfilling this reporting obligation, the CPO must provide all information acquired during the exercise of their role and may not withhold any relevant details pertaining to their assigned functions.

### ***Art. 9 - Removal.***

The CPO may be removed at any time through a formal decision by the Company's Board of Directors. The removal must be supported by justified and documented reasons to ensure the transparency of the process and to preserve the independence and integrity of the CPO's role. This change will be appropriately communicated within the Company to ensure the continuity and effectiveness of the CPM.

### ***Art. 10 - Replacement.***

In the event of incapacity to perform the duties of the CPO, or if a conflict of interest prevents the CPO from investigating related to a complaint, the Board of Directors shall appoint a replacement. The replacement will be granted the same conditions of independence, resources, and authority as the original CPO.

## **TITLE III**

# **ETHICS COMMITTEE**

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### ***Art. 11 - Ethics Committee.***

An Ethics Committee will be established to operate within the Company, composed of the CPO, the General Manager, the Deputy General Manager, and a third person specifically appointed for this purpose. The Ethics Committee will be responsible for addressing situations referred to by the CPO for review, as well as applying sanctions when deemed appropriate.

### ***Art. 12 - Requirements.***

The members of the Ethics Committee must be natural persons, of legal age, with full capacity to manage their assets, and must not have been convicted of crimes punishable by severe penalties.

### ***Art. 13 - Obligations of the Ethics Committee.***

The Ethics Committee must strictly comply with all provisions established in this Model. In particular, it has the following obligations:

- a. Accept all reports referred to by the CPO regarding incidents encountered in the exercise of their duties, which constitute violations of this Model, its supplementary documents, or may involve crimes outlined in Article 1 of Law No. 20.393.
- b. Impose sanctions against individuals or entities acting as third parties (e.g., contractors, clients, suppliers, or others) if their responsibility in violations of this Model is determined. Once an investigation concludes, the CPO shall formally request the application of a sanction by the Committee. The Committee's decision, whether to apply or not apply the requested sanction, must be issued in writing or through another appropriate means within 10 days of receiving the CPO's recommendation. The decision must be justified and include all relevant supporting information.
- c. In procurement processes involving products or services exceeding 2,000 UF, the Committee may request additional information from the relevant management overseeing the process. This information may include details about the identity of shareholders or key executives, as well as financial records, such as the tax file and the latest financial statement, to validate the selection of a supplier.
- d. Identify, as appropriate and with justification, individuals considered Related Parties as defined in the respective Protocol.
- e. At the request of the CPO, review public procurement or bidding cases where a Company collaborator or representative requires contact outside those defined in the process guidelines as specified in the Policy on Relations with Public Officials. This is particularly important if the CPO detects risks or exposure related to crimes under Law No. 20.393.
- f. Provide specific instructions when contact with a Public Official arises from an inspection of the Company. The Committee must designate a responsible person in each case, define their obligations, and outline the information they must provide to the CPO.
- g. Determine whether certain information, not explicitly defined as such in Hoffens' Code of Ethics, should be treated as privileged if its sensitivity could expose the Company to risks related to the crimes outlined in Law No. 20.393.



**Art. 14 - Powers.**

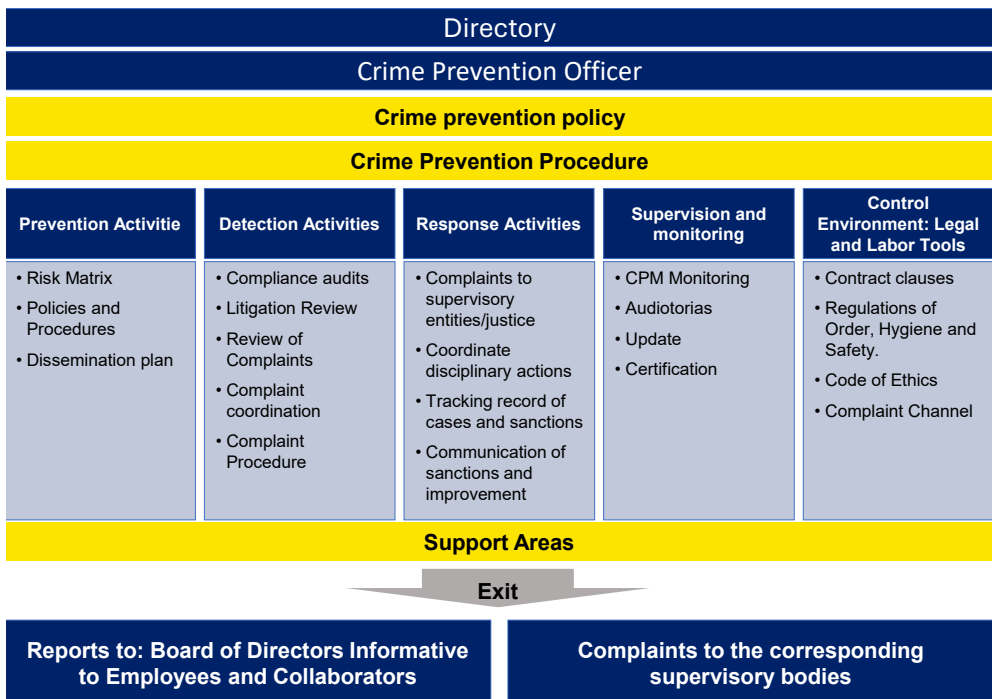
The Ethics Committee is empowered to request from the Company's management all information relevant to fulfilling its objectives, including accounting documents, files, financial statements, records, and similar materials. Additionally, it may request further details from the CPO, or the individuals involved if deemed necessary to decide on the application of a sanction.

## TITLE IV

# CRIME PREVENTION SYSTE

**Art. 15 - Crime Prevention System.**

A crime prevention system is established, consisting of preventive, detection, response, supervision, and monitoring measures, as well as a control environment aimed at preventing the commission of crimes under Law No. 20.393. This system is designed to ensure integrity and regulatory compliance across all Hoffens operations, as outlined in the following framework:

**Art. 16 - In accordance with Law 20.393,**

The CPO, in collaboration with the management of the legal entity, must establish a crime prevention system for Hoffens, which must include at least the following:

- a. Evaluate activities or processes with criminal risk through a Risk Matrix, to be reviewed annually or in the event of significant changes.

- b. Establish protocols and procedures to prevent and detect criminal behavior, including secure reporting channels and internal sanctions for non-compliance.
- c. Ensure that protocols and internal sanctions are communicated to all collaborators.
- d. Explicitly incorporate internal regulations into employment contracts, including those of senior executives and service providers.

#### ***Art. 17 - Preventive Measures.***

The CPO must inform the Company's Ethics Committee in writing or via email about any activity deemed inadvisable, while promoting or adopting, as necessary, any of the following actions:

- a. Obtain specific details about clients, suppliers, or third parties.
- b. Refrain from carrying out operations deemed suspicious.
- c. Advise management or administration to avoid relationships with individuals or entities identified as high risk.
- d. Propose the replacement of employees involved in negotiations presenting risks.
- e. Suggest initiating judicial action or filing complaints with the Public Prosecutor's Office in cases of serious violations.
- f. Establish and oversee measures and processes deemed necessary to ensure compliance with this Crime Prevention Model (CPM).
- g. Organize regular training sessions to ensure collaborators understand the CPM and its application.

#### ***Art. 18 - Information.***

Any individual providing services or acting on behalf of the Company, whether as a direct or indirect employee, collaborator, or service provider, must be informed by the CPO about risks, protocols, basic ethical standards, and best practices to be followed in the performance of their duties within and for the Company. This information will pertain to the prevention of crimes such as money laundering, terrorism financing, bribery, and receiving stolen goods.

### **TITLE V**

## **COMPLAINT AND SANCTION PROCEDURE**

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#### ***Art. 19 - Whistleblowing Channel.***

The Company has a whistleblowing channel to receive information regarding violations or concerns related to this Model.

- a. Send inquiries or requests for guidance to [denuncias@hoffens.com](mailto:denuncias@hoffens.com) or directly to the CPO.
- b. This document will be made available on Hoffens' website at [www.hoffens.com](http://www.hoffens.com) or can be requested directly from the CPO.
- c. To report a potential suspicion or violation, the whistleblowing channel is accessible on Hoffens' website at [www.hoffens.com](http://www.hoffens.com).
- d. The CPO and the management will ensure that the entire Company is informed about the existence and operation of the whistleblowing channel and will encourage its use.

**Art. 20 - Duty to Report.**

All employees, workers, collaborators, service providers, and other stakeholders are obligated to report any facts they are aware of or suspect that may constitute a violation of the rules outlined in this Model. Such reports must be submitted through the official channel available on the Company's website, ensuring that the CPO can appropriately manage and address the matter.

**Art. 21 - Reporting Options**

Reports can be submitted either nominatively or anonymously. In the case of a nominative report, it will remain completely confidential, and the whistleblower must provide their name, RUT, contact phone number, email address, as well as other information requested in the form to ensure proper receipt of the report.

In the case of an anonymous report, the whistleblower must attach supporting evidence along with their report; otherwise, it cannot be considered.

**Art. 22 - Expected Basis for Each Report.**

- a. a.Type of violation reported; description of the events; approximate location and dates; name or position of those involved.
- b. Explanation of how the misconduct or violation occurred or is occurring.
- c. Submission of documents or photographs that support the report, if available.
- d. Names or identification of other individuals who have witnessed the events.

The CPO must contact the whistleblower if they have provided a contact channel. In such cases, the CPO will acknowledge receipt of the report, inform them of the actions to be taken, and reiterate the Company's commitment to confidentiality regarding the information shared.

**Art. 23 -**

Reports received by the CPO must be analyzed while safeguarding the confidentiality of both the whistleblower and the accused, unless the investigation and subsequent actions require the disclosure of specific information. If the report involves the CPO, it must be communicated to the Company's Board of Directors, which will appoint another individual or institution to carry out the investigation.

**Art. 24 -**

The CPO is authorized to hire any investigative support services deemed necessary.

**Art. 25 -**

During the investigation, the CPO must respect the presumption of innocence of the accused individual.

**Art. 26 - Investigation Procedure.**

The investigation will commence with a formal notification to the accused individual, who will be informed of the alleged infraction. The accused will also be given the opportunity to submit a written defense within five business days. Should the accused fail to present a defense or admit to the alleged facts, the CPO will escalate the matter to the Ethics Committee, recommending the imposition of an appropriate sanction.

If the accused denies the allegations or attributes them to specific conditions, the CPO will proceed with a formal investigation, notifying the accused of this decision.

During the investigation, the CPO may request relevant information from all company personnel, who are required to cooperate promptly. The CPO may also seek information from any involved third parties.

The accused is entitled to present evidence or request investigative actions deemed necessary during the process. All actions undertaken by the CPO will remain confidential and disclosed only to the accused, except in cases justified by specific reasons.

The investigation must be completed within a maximum period of 30 days, and a resolution must be declared. Confidentiality during the investigation may not extend beyond 20 days concerning the accused.

### ***Art. 27 - Risk Impact Classification.***

Based on the investigation's findings and the nature of the complaint, the situation will be categorized according to the risk impact. This classification will determine the severity of the events and the appropriate actions to address them. The impact will be assessed by the magnitude of the risk, classified as low, medium, or high:

- a. **Low Risk Impact:** Minor infractions that do not significantly threaten the integrity of the company. Actions focus on education and guidance, promoting compliance with the MPD standards and preventing the recurrence of inappropriate behaviors.
- b. **Medium Risk Impact:** More serious infractions that may affect the company's operations or reputation. Corrective measures are required, along with a thorough analysis of the involved behavior, clearly communicating compliance expectations.
- c. **High Risk Impact:** Severe or recurrent infractions classified as high risk. An in-depth investigation is conducted to evaluate the situation and determine appropriate corrective actions. Transparency in the process is crucial to inform those involved while maintaining the confidentiality of the information.

### ***Art. 28 - Charge Formulation.***

The formulation of charges applies to both employees and other stakeholders with a contract or declaration related to this Model. Upon completing the investigation, the EPD may either dismiss the case or escalate it to the Committee to recommend imposing sanctions against the individuals found responsible.

This statement must be issued in writing or via email within 10 days after the investigation concludes. The recommendation will include a detailed justification and all supporting evidence to ensure the transparency of the process.

### ***Art. 29 - Sanction System.***

Violations of the provisions established in this Model will result in one or more of the following sanctions:

Sanctions for Employees:

- a. Verbal reprimand by the immediate supervisor.
- b. Written reprimand by the direct supervisor or Management, with a copy sent to the Labor Inspectorate.
- c. For serious misconduct, repeated minor infractions, or deliberate or negligent non-compliance with safety regulations, the employee may be fined up to 25% of their daily base salary. The proceeds of these fines will be allocated as stipulated by law.

- d. Commitment letter: A positive disciplinary procedure may be applied through a letter in which the employee commits to correcting their behavior. A copy of this commitment letter will be sent to the Labor Inspectorate.
- e. Termination of the employment contract: In case of recurrence after signing the commitment letter, the employer may terminate the employment relationship.
- f. Notwithstanding the above, nothing in this Model shall prevent the Company from exercising its right to terminate the employment contract if the employee engages in any misconduct defined by labor law.

Sanctions for Providers and Services:

- a. In cases of repeated or deliberate non-compliance, Hoffens may terminate the contractual relationship with the provider or service provider.
- b. A thorough review of the commercial relationship will be conducted, which may result in the non-renewal of the contract.
- c. Contract clauses will be established to ensure providers commit to complying with the CPM.

### ***Art. 30 - Final Decision.***

The decision adopted by the Ethics Committee must be issued within 10 days following the filing of charges. This decision may be appealed within 5 days of its issuance, except in cases where a verbal or written reprimand is imposed, as these cannot be appealed.

If the responsibility of the accused is determined, the ruling will be immediately communicated to the Deputy Manager of Human Resources or their designated representative, who will proceed with the application of the corresponding sanction in accordance with current labor legislation.

### ***Art. 31 - Presentation of Investigation Results.***

The results of all investigations, both formal and informal, must be presented to the company's Board of Directors.

Formal investigations are those that meet the established criteria to initiate an inquiry process, typically based on specific complaints and sufficient evidence that justify a detailed evaluation.

On the other hand, informal investigations are those that do not meet these criteria, either because there is insufficient evidence to initiate a formal investigation or because the complaints made lack clear information requiring further inquiry.

### ***Art. 32 - Collection Procedure.***

Once the ruling is final, the penalty may be deducted directly from the sanctioned worker's salary, remuneration, service payments, bonuses, gratuities, or any other sum of money owed to them.

### ***Art. 33 - Actions in Case of Crimes.***

Notwithstanding the provisions of the preceding articles and the investigation conducted by the Company, the Compliance Officer (EPD), upon becoming aware of any act constituting the crimes referred to in Article 15, must immediately provide the relevant evidence to the Committee to facilitate the initiation of the appropriate legal actions.

### ***Art. 34 - CPM Update.***

The CPM must be updated following an evaluation of its design and operational effectiveness. The CPO will consider new applicable regulations, significant changes within the company or industry, and

the monitoring of implemented improvements in controls. Based on this information, the CPO will update the company's Risk Matrix and controls, as well as the policies and procedures necessary to ensure effective oversight.

***Art. 35 - Validity.***

The obligations, prohibitions, and sanctions outlined in this Model shall be considered an integral part of all employee contracts. These provisions will come into effect 30 days after being communicated to all company employees or as specified in their individual contracts.

For other stakeholders, the conditions of the Model will be subject to the terms stipulated in the corresponding contract. Declarations of awareness and compliance with this Model will take effect from the date the contract is signed.





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