

CRIME PREVENTION MODEL MANUAL EMPRESAS SUTIL S.A.

CONTENTS

1. OBJECTIVE.....	3
2. SCOPE	3
3. DEFINITIONS	3
4. CRIME PREVENTION MODEL.....	6
4.1. GRAPHICAL MODEL OF PREVENTION	7
4.2. APPOINTMENT OF THE PERSON IN CHARGE OF CRIME PREVENTION (EPD).....	10
4.3. DEFINITION OF MEANS AND POWERS OF THE EPD.....	10
4.4. CRIME PREVENTION POLICY	10
4.5. CRIME PREVENTION PROCEDURE.....	10
4.5.1. Prevention Activities:.....	10
4.5.1.1. Dissemination and Training	10
4.5.1.2. Crime Risk Identification and Analysis	10
4.5.1.3. Implementation of Prevention Controls	12
4.5.2. Detection Activities:.....	12
4.5.2.1. Litigation Review	12
4.5.2.2. Review of Complaints.....	12
4.5.2.3. Compliance with Model Controls	12
4.5.3. Response Activities:.....	12
4.5.4. Monitoring:.....	13
4.6. ELEMENTS OF SUPPORT TO THE MPD.....	13
4.7. CONTROL ENVIRONMENT OF THE MDP	14
4.8. REPORTING.....	15
5. VALIDITY AND MODIFICATIONS.....	15



1. OBJECTIVE

The purpose of this document is to summarise all the elements of the Crime Prevention Model implemented by Empresas Sutil S.A. and its subsidiaries, in accordance with the provisions of Law No. 20.393 on Criminal Liability of Legal Entities (the "MPD"), as well as to prevent other types of misconduct typified in laws, rules and regulations of supervisory bodies, and other rules established within Empresas Sutil S.A.

2. SCOPE

In relation to the provisions of Law N° 20.393, this document is applicable to the offences typified by said Law and its subsequent amendments (Law 21.121, Law 21.132, Law 21.227, Law 21.240, Law 21.325, Law 21.412 and Law 21.459) and which are committed by any person who participates in Empresas Sutil S.A. and its subsidiaries, understood as Controllers, Directors, Executives, Representatives, Collaborators, Clients, Suppliers, Contractors and third parties who have any kind of relationship with Empresas Sutil and its Subsidiaries.

Consequently, both Law No. 20.393 and the MPD implemented by Empresas Sutil S.A. and its subsidiaries are applicable to all the persons mentioned in the preceding paragraph and shall apply to the following companies: Empresas Sutil S.A., Coagra S.A., Banagro S.A., Coagra Agroindustrial S.A., Pacific Nut Company Chile S.A., Frutícola Olmué Spa., Champiñones Abrantes S.A., Agrícola Sutil S.A. and subsidiaries, Top Wine Group S.A. and subsidiary and Hotel Viña La Playa (hereinafter Empresas Sutil).

3. DEFINITIONS

Legal Person: Organization of persons or of persons and property to which the law recognizes the capacity to be the subject of rights and obligations, such as corporations, associations, partnerships and foundations.

Criminal Liability of the Company: Situation in virtue of which a natural person can be declared responsible for the commission of a crime. This extends to companies, in accordance with law 20.393, when the crimes indicated in this norm are committed directly and immediately in the interest of the company or for its benefit by its owners, executives or agents, provided that the commission of the crime is a consequence of the company's failure to comply with its duties of management and supervision. The company shall also be liable when the above offences are committed under the same conditions by natural persons who are under the direct management or supervision of the persons mentioned in the previous paragraph.

Money laundering: Anyone who in any way conceals or disguises the illicit origin of certain assets, knowing that they come, directly or indirectly, from the perpetration of acts constituting any of the offences contemplated in Law No. 19.366, which punishes the illicit trafficking of narcotics and psychotropic substances; in Law No. 18.314, which determines terrorist conduct and establishes its penalties; in Article 10 of Law No. 17.798, on arms control; in Title XI of Law N° 18.045, on the securities market; in Title XVII of Decree with force of law N° 3, of 1997, of the Ministry of Finance, General Law on Banks; in Paragraphs 4, 5, 6, 9 and 9 bis of Title V of Book II of the Criminal Code and, in Articles 141, 142, 366 quater, 367 and 367 bis of the Criminal Code; or, knowing of such origin, conceals or disguises these goods. Whoever acquires, possesses, holds or uses the aforementioned goods, for profit, when at the time of receiving them has known their illicit origin.

Terrorist Financing: The act of a natural or legal person who, by any means, solicits, collects or provides funds for the purpose of being used in the commission of any terrorist offence, such as, for example, placing, sending, sending, activating, throwing, detonating or firing bombs or explosive or incendiary devices of any kind, sending explosive letters or parcels, attacking the Head of State and other authorities, kidnapping and abduction of children, seizing or attacking



a means of public transport in service, unlawful association for the purpose of committing terrorist offences, etc. , (art. 8, Law N° 18.314, which determines terrorist conducts and establishes their penalties).

Bribery of a National Public Official (bribery): Whoever offers or consents to give a public employee an economic benefit, for the benefit of the latter or of a third party, to carry out the actions or incur in the omissions indicated in articles 248, 248 bis and 249 of the Penal Code, or for having carried them out or having incurred in them (art. 250 of the Penal Code).

Bribery of a Foreign Public Official (bribery): Anyone who offers, promises or gives a foreign public official a financial or other benefit, for the benefit of the official or a third party, to perform an action or omission with a view to obtaining or maintaining, for himself or another, any undue business or advantage in national or international commercial transactions (art. 251 bis of the Criminal Code).

Receiving: The offence of receiving is committed by anyone who, knowing its origin or being unable to know it, has in his possession, in any way, stolen or stolen goods, transports them or markets them in any way. It is an aggravating circumstance if the species are motorised vehicles or things that form part of the supply networks of public or domestic services, such as electric cables, gas, water, sewage, rainwater collectors or telephony pipes.

Incompatible Negotiation: This can be committed in Companies by directors or managers or any other person holding a power delegated by them, who is interested in any negotiation, action or contract that involves the company, directly or indirectly, being incompatible with the exercise of their position, and takes some kind of personal advantage or for someone related to them.

Bribery or bribery between individuals: The offence is constituted by the fact that an employee or agent requests or accepts to receive an economic benefit or of another nature, for himself or a third party, with the aim of favouring or having favoured one bidder over another in the exercise of his duties in the contracting with one bidder; it is also considered an offence of the supplier who offers or accepts to give a similar benefit.

Misappropriation: When a person of the company takes possession of money or goods belonging to another person or company, who should return it or reinstate it within a defined period of time and does not do so.

Unfair Administration: This is committed when the administrator of an asset or company, being in charge of safeguarding or managing the assets of a third party, causes damage to the latter by abusively exercising his powers of representation, or by carrying out or omitting to carry out any other action in a manner manifestly contrary to the interest of the owner of the affected assets.

Water Pollution: The offence is constituted when a person introduces or orders the introduction into the sea, rivers, lakes or any other water flow, of chemical, biological or physical pollutants that cause damage to hydro biological resources.

Public official: Anyone who holds a public position or function, whether in the central administration or in semi-fiscal, municipal, autonomous institutions or companies or bodies created by the State or dependent on it, even if they are not appointed by the Head of the Republic or do not receive a salary from the State (art. 260 of the Penal Code). For the purposes of this qualification, the fact that the post is a popularly elected post shall not be an obstacle.



Foreign Public Official: Any person holding a legislative, administrative or judicial position in a foreign country, whether appointed or elected, as well as any person exercising a public function for a foreign country, whether within a public body or a public enterprise. The same applies to any official or agent of a public international organisation (art. 251° ter of the Criminal Code).

Infringements of access to unemployment insurance benefits (Law 19.728) in exceptional circumstances: This offence is committed when a person, in accordance with the provisions of Law 21.227, obtains by means of simulation or deceit complement and/or benefits and who in the same way obtains a greater benefit than that to which they are entitled by law. Employers who are legal persons shall be liable for the above offences committed directly or indirectly in their interest or for their benefit, by their owners, responsible controllers, chief executives, representatives or those who carry out management and supervisory activities, provided that the commission of such offences is the consequence of non-compliance by the legal person. Employers who are legal persons shall also be liable when such offences are committed by natural persons who are under the direct management or supervision of any of the persons referred to in the previous paragraph.

Non-observance of isolation or other preventive measure ordered by the health authority, in case of epidemic or pandemic: This offence is committed when a person, in accordance with the provisions of law 21.240, contravenes the sanitary measures of isolation or other in case of epidemic or pandemic, knowingly or having the authority to arrange the work of a subordinate, orders him to go to the place of performance of his work when this is different from his home or residence, and the worker is in quarantine or compulsory sanitary isolation decreed by the health authority.

Smuggling of migrants: This offence is committed when a person, in accordance with the provisions of law 21.325, with the intention of profit, facilitates or promotes the illegal entry into the country of a person who is not a national or resident.

Trafficking in persons: This offence is committed when a person, in accordance with the provisions of law 21.325, encourages the promotion, facilitation or financing of the execution of the following conducts:

- i. Recruitment through: threats, coercion, abduction, fraud, deception, abuse of power, abuse of a situation of vulnerability and giving or receiving money or benefits to obtain consent.
- ii. ii. transfer
- iii. iii. harbouring
- iv. iv. exploitation for: forced labour or services, servitude or slavery or practices similar to slavery, prostitution and removal of organs.

Arms Control: Law 21.412, modified various legal bodies to strengthen arms control in our country. One of the most relevant modifications consisted of incorporating the crimes of Title II of Law No. 17.798 on arms control into Law No. 20.393, on criminal liability of legal persons, which will be potentially liable for the commission of the following crimes: possession, carrying, commercialisation, possession, internment and importation of arms, articles or ammunition prohibited or subject to control.

Computer Crimes: Law 21.459 establishes the rules on computer crimes, repeals Law 19.223 and modifies other legal bodies in order to adapt them to the Budapest Convention.



Attack on the integrity of a computer system: whoever hinders or prevents the normal operation, in whole or in part, of a computer system through the introduction, transmission, damage, deterioration, alteration or suspension of computer data.

Unlawful access: Anyone who, without authorisation and by overcoming technical barriers or technological security measures, gains access to a computer system.

Unlawful interception: Whoever improperly intercepts, interrupts or interferes, by technical means, with the non-public transmission of information from a computer system between two or more such systems.

Attack on the integrity of computer data: establishes that altering, damaging, or deleting information is also considered an offence.

Computer forgery: it is considered as computer forgery when someone enters, alters, damages or deletes computer data with the intention that it should be taken as authentic background.

Receipt of computer data: the marketing, storage or transfer of illicit material is considered a crime.

Computer fraud: refers to the manipulation of computer data by entering, altering, damaging or deleting data for financial gain.

Abuse of devices: this offence criminalises the alteration of computer programs, passwords, security or access codes or similar with the aim of perpetrating the 7 previous offences.

Whistleblowing Procedure: Procedure by which employees or third parties to the organisation can make complaints about apparent violations of current legislation, regulations, law 20.393 and other internal and external rules.

4. CRIME PREVENTION MODEL

Empresas Sutil's MPD is defined as a set of rules, policies and organisational, administrative and supervisory procedures established for the purpose of preventing the commission of the crimes referred to in article one of Law No. 20.393 and its subsequent updates, as well as other types of misconduct.

In compliance with the provisions of article four of Law No. 20.393, the MPD is composed of the following elements:

1. Designation of a person in charge of prevention.
2. Definition of the means and powers of the person in charge of prevention.
3. Establishment of a Crime Prevention System.
4. Supervision and Monitoring of the Crime Prevention System.

The responsibility for implementing, maintaining and supervising the Prevention Model lies with the Board of Directors and Senior Management, together with the Crime Prevention Officer, hereinafter referred to as the "Prevention Officer".

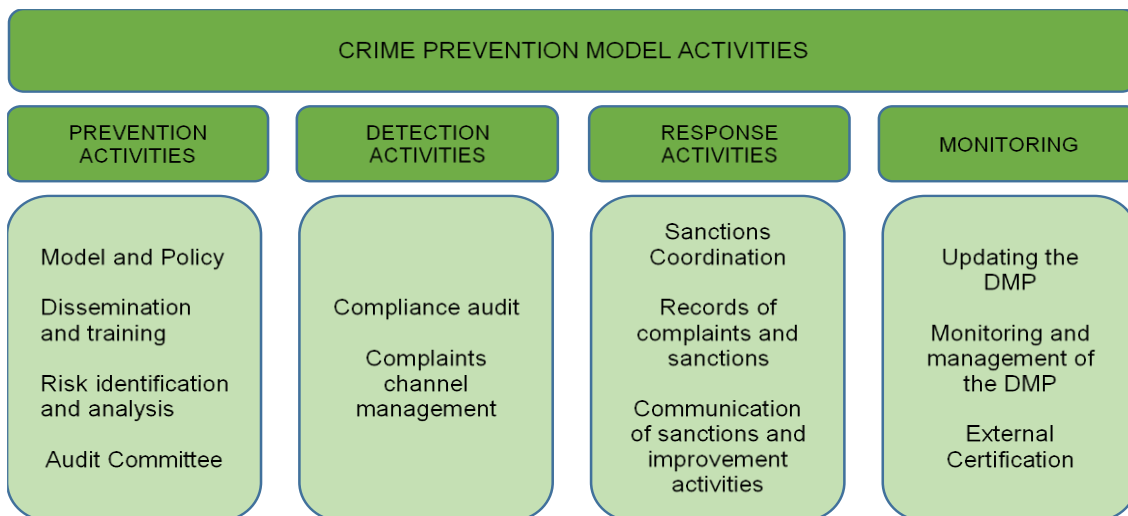
The structure of the Prevention Model is presented graphically below:



4.1. GRAPHICAL MODEL OF PREVENTION



The following diagram shows the main activities or components that make up Empresas Sutil's crime prevention model.



Prevention Actions:

- a. Crime Prevention Model;
- b. Crime Prevention Policy;
- c. Conflict of Interest Policy;
- d. Gift Policy;
- e. e. Functioning of the Audit Committee;
- f. Regular Training and Dissemination on Criminal Liability of Legal Entities;
- g. Identification and incorporation of Compliance Risks in the company's risk matrix;
- h. Procedure for Relations with Public Officials;
- i. Code of Ethics and Conduct
- j. Internal Rules of Order, Hygiene and Safety;
- k. annexes to contracts.

Detection Actions:

- a. Audits of compliance with controls;
- b. Administration of a whistleblower hotline;
- c. Regular interviews with executives and legal advisors.
- d. Whistleblowing Channel:

Website: <https://empresassutil.eticaenlinea.cl/>

- e. Complaints Procedure:

The procedure, including the scope, objectives and competences, is available on the respective website: <http://www.empresassutil.cl>, a summary of which is as follows:

- i. Any person (employee, executive, director, supplier, contractor, shareholder or third party) may report offences, infringements or breaches of ethics of which he/she becomes aware through the following Reporting Channels mentioned in letter d).
- ii. The report may be made in nominative or anonymous form. In the case of a nominative complaint, the complainant must provide his/her full name, telephone number and e-mail address. In the case of an anonymous complaint, the complainant must indicate or attach the background information on which the complaint is based, otherwise the complaint will not be considered.
- iii. Complaints shall preferably contain the following background information:
 - Type of infringement reported, description of the facts, place and reference dates, name or position of those involved.
 - The account of the circumstances in which the alleged facts took place should contain as much detail as possible.
 - The manner in which he/she became aware of the facts denounced.
 - The individualisation of those who committed them, with indication of name, surname, position and area, or of the data that allow their individualisation.
 - The individualisation of the persons who witnessed the facts denounced or who have information about them, if these are known to the denouncer.
 - Any other information that may be useful in the evaluation, investigation and final resolution of the facts denounced.



- The background information, documents and any other means on which the complaint is based, which must be attached to it.

All of the above must be raised in good faith.

- Complaints received through the aforementioned channels must be recorded by the Crime Prevention Officer, who must maintain the confidentiality of this record.
- Once a complaint has been received through one of the above channels, the Crime Prevention Officer must carry out a timely and confidential analysis of the facts reported, in order to determine the subject matter of the complaint and adopt, as the case may be, the appropriate measures.
- Investigations into possible offences will be the responsibility of the Crime Prevention Officer, unless the complaint involves the latter, directly or indirectly, which circumstance must be reported to the Chairman of the Directors' Committee of Empresas Sutil S.A., so that he may appoint another person to be in charge of the investigation.
- The Crime Prevention Officer must investigate the complaint in a confidential manner, keeping confidential the facts denounced, as well as the identity of the complainant and the person denounced, allowing only the disclosure of the information necessary to carry out the actions required by the investigation.
- During the investigation, the Crime Prevention Officer must respect the presumption of innocence of the reported person.
- The Crime Prevention Officer may conduct the investigation with the support of Internal Audit or any other management, executive or employee of the Company. If necessary, he/she may engage the services of external auditors, experts or external specialised persons to support the investigation and analysis of the matters that require it.
- In order to give greater credibility and reliability to the Whistleblowing Channels, the Crime Prevention Officer shall communicate to the whistle-blower the actions taken upon receipt of the complaint and at the end of the investigation, briefly and in general terms, provided that the whistle-blower has provided a valid contact email address.
- In addition, when the circumstances so warrant, internal dissemination of the outcome of the investigation and the measures taken may be instructed, so that they are known to all levels of the Company, while maintaining the confidentiality of the complainant.
- This procedure shall be permanently monitored and reviewed at least once a year, from its entry into force, by the Crime Prevention Officer, proposing any necessary changes in both form and substance.

Response Actions:

- Propose corrective and/or disciplinary action in response to complaints received through the whistleblowing channel;
- Propose modifications or the adoption of actions to mitigate the risks of non-compliance with Law 20.393 and its subsequent updates and modifications;
- Report, coordinate and propose measures to the Board of Directors, through the Audit Committee.

Monitoring Actions:

- Permanent updating of the Model
- Application of surveys to measure the company's ethical climate.
- External certification of the Model.



4.2. APPOINTMENT OF THE PERSON IN CHARGE OF CRIME PREVENTION (EPD)

The Board of Directors by means of Minute Session No. 45, held on 14 May 2018, appointed Ms. Verónica Valenzuela Irribarren, Internal Audit Manager of Empresas Sutil S.A., as Crime Prevention Officer, who will hold both positions jointly.

4.3. DEFINITION OF MEANS AND POWERS OF THE EPD

The Board of Directors expressly stated that the Prevention Officer will have the powers and duties defined in Law No. 20.393 and in the Crime Prevention Policy, will hold office for a term of three years, renewable as of the date of his appointment, and will have an annual budget to adequately carry out his work.

4.4. CRIME PREVENTION POLICY

This document provides the guidelines on which the implementation and execution of the MDP is based. In addition to the roles and responsibilities of the people involved in the model.

4.5. CRIME PREVENTION PROCEDURE

For methodological purposes, the elements of the Crime Prevention System are classified into the following activities:

- a) Prevention
- b) Detection
- c) Response
- d) Supervision and Monitoring

4.5.1. Prevention Activities:

These are actions and elements whose objective is to persuade people not to engage in conduct or omissions related to non-compliance with the obligations contained in the Prevention Model and the commission of the offences set out in Law No. 20,393, as well as conduct that violates the rules set out in the Code of Ethics and Conduct of Empresas Sutil S.A.

This activity is the most relevant from the perspective of obtaining a real commitment from everyone to ethics and compliance with current legislation.

4.5.1.1. Dissemination and Training

- a. The incorporation of MPD matters and associated offences in induction programmes.
- b. Dissemination of MPD information through Intranet channels, mass mailings, wall newspapers.
- c. Regular training.

4.5.1.2. Crime Risk Identification and Analysis

- a. Risk Identification.

The EPD is responsible for the risk identification process and in conjunction with the Company's management. This process should be performed annually or when relevant and material changes occur in any business area. In order to carry out this activity, a:

- i. Crime Risk Identification

The identification of crime risks is carried out by means of interviews with key personnel of Empresas Sutil, with the participation of the organisation's functions and leadership positions. This will lead to the identification of the main risk scenarios for the commission of crimes within the scope of the law that are committed in the direct and immediate interest or benefit of Empresas Sutil and that are committed by owners, controllers, directors, managers, senior executives, representatives and/or senior management, or those who perform management and supervisory



activities, as well as natural persons who are under the direct management or supervision of any of the aforementioned individuals.

ii. Definition of controls

For the risks detected, the existing control activities for their mitigation must be identified. The identification of controls will be carried out in working meetings with the participation of representatives from all areas and functions of the organisation. For the controls identified, their design shall be evaluated in relation to the mitigation of the crime risk to which they apply. This assessment must be carried out by the Crime Prevention Officer in conjunction with the MPD support areas. In assessing the design of each control, consideration should be given to whether the combination of the following elements reasonably mitigates the materialisation of the associated risk.

THE ELEMENTS TO BE CONSIDERED ARE:

Features	Attribute
Type of Control	Preventive / Detective
Category	Manual / Application / Semi-Automatic
Evidence	Documented / Undocumented
Segregation of Duties	Responsible for Control Execution
Frequency	Every time, Daily, Monthly, Quarterly or Yearly

For all controls assessed as "Does not reasonably mitigate the risk of crime", a control activity must be implemented. The design of the new control activity will be carried out by the area responsible for mitigating the risk associated with the deficient control, which will be responsible for its implementation and execution.

The processes and activities indicated below have been identified as critical within the Company's operation, in terms of presenting a higher level of exposure to the risk of the commission of some of the offences established in Law No. 20.393 and its subsequent amendments:

Processes:

- Cash collections
- Donations
- Marketing and Commercialisation
- Travel and Accommodation
- Obtaining Patents, Permits, Concessions and Works Receipt
- Domestic Purchases
- Import of goods
- Contracting of services
- Submission of Funds and Reimbursement of Expenses
- Investments



4.5.1.3. Implementation of Prevention Controls

The prevention controls are basically constituted by the Policy and the DMP, as well as by the ethical values of the organisation, contained in the Code of Ethics and Conduct. Thus, the DMP prevention controls are composed of, but not limited to, the following Documents:

- Code of Conduct and Best Practices.
- Crime Prevention Policy.
- Complaints Procedure.
- Internal Rules of Order, Hygiene and Safety.
- Complementary or related policy or procedures.
- Legal and labour instruments
- Annex for Workers' Contracts
- Annex for Contractors or Third Parties Contract.

4.5.2. Detection Activities:

The objective of these activities is to carry out actions to detect possible contraventions of the Prevention Model and/or the commission of any of the offences set out in Law No. 20.393.

This activity makes it possible to evaluate the correct functioning of the prevention programmer.

4.5.2.1. Litigation Review

At least once a year, the company's Legal Advisors must provide the Crime Prevention Officer with a report detailing: Activities arising from audits carried out by regulatory bodies associated with crime scenarios of Law No. 20.393 and its amendments. Claims, lawsuits or any legal action involving Empresas Sutil in any crime scenario related to Law No. 20.393 and its amendments. Fines and/or infractions issued or under review by regulatory bodies associated with scenarios of offences under Law No. 20,393 and amendments thereto.

4.5.2.2. Review of Complaints

The Crime Prevention Officer, in conjunction with the Audit Committee, should analyse the complaints received through the channels provided by the company to identify those that fall within the scope of the Crime Prevention Model or are associated with crime scenarios under Law No. 20,393 and its amendments. Complaints will be dealt with in accordance with the provisions of the "Empresas Sutil Complaints Procedure".

4.5.2.3. Compliance with Model Controls

Internal Audit, in coordination with the Crime Prevention Officer, must audit compliance with the associated controls. These reports must be sent to the Crime Prevention Officer.

4.5.3. Response Activities:

The objective of response activities is to establish resolutions, disciplinary measures and/or sanctions to those who breach the Prevention Model or upon detection of indicators of offences under Law No. 20.393. As part of the response activities, the review of violated control activities should be considered, in order to strengthen them or replace them with new control activities.

The response activities of the Prevention Model are as follows:



- Whistleblowing (Optional)

The Crime Prevention Officer should evaluate, together with the Legal Advisors and the Audit Committee, the possibility of filing a complaint with the Courts of Justice, the Public Prosecutor's Office or the Police.

- Disciplinary sanctions

Disciplinary measures adopted in the event of non-compliance with the Crime Prevention policy and model or the detection of indicators of potential offences must be proportionate to the offences committed, consistent with the organisation's disciplinary policies and procedures and applicable to all persons or areas involved.

- Recording and follow-up of complaints and sanctions

The Crime Prevention Officer should maintain an up-to-date record of complaints, investigations (ongoing and closed) and disciplinary measures applied in relation to non-compliance with the DMP or the detection of offences, as set out in the "Complaints Management Procedure".

- Communication of sanctions and improvement of control activities of the Prevention Model, which present weaknesses.

As a result of the investigation and resolution of breaches of the MPD, the appropriateness of communicating the disciplinary measures adopted to the organisation should be assessed. The EPD, with the support of the Audit Committee, should consider a communication in order to inform the employees and third parties involved.

The development of this activity makes it possible to correct and respond to queries or infringements identified in the detection activity.

4.5.4. Monitoring:

The objective of supervision and monitoring is to verify the proper functioning of the defined control activities and also to assess the need for improvements in the Prevention Model.

The Prevention Manager will commission audits on various aspects of the functioning of the Prevention Model and will also be attentive to any changes that may occur in the internal and/or external environment of Empresas Sutil, so as to be able to arrange for the modifications that the Model requires to be made as quickly as possible.

At its ordinary meeting in August 2019, the Board of Directors approved to ensure the correct functioning of the Prevention Model, for which purpose it will monitor its operation through the half-yearly accountabilities and reports that the Prevention Officer will deliver, without prejudice to the specific reports that the Board may request from the Prevention Officer.

4.6. ELEMENTS OF SUPPORT TO THE MPD

Support areas

The objective of the support areas is to prevent the occurrence of crimes and to support the Crime Prevention Officer in prevention, detection, response and monitoring activities. These are composed of, but not limited to, the following areas:



- Directories
- General Management
- Internal Audit Management
- Legal Management
- Administration and Finance Managements or Deputy Managements
- Human Resources and People Managers, Deputy Managers, or areas.
- Legal Advisors, who must:
 - Advise on the process of including the corresponding clauses (Law 20.393 and its amendments) in the various contracts entered into by the company with third parties and workers.
 - Advise and support the EPD in the identification of risks inherent to the law.
 - Delivery of annual reports detailing the complaints related to the commission of the offences indicated in Law 20.393 and its amendments. Report on lawsuits, trials or any legal action involving the organisation in any crime scenario related to Law 20.393 and its amendments.
 - Support and advise the EPD in the execution of investigations derived from complaints that have implications for the MPD or are associated with crime scenarios of Law 20.393 and its amendments.
 - Advise the EPD on decision-making in relation to sanctions and corrective actions to be implemented as a result of the investigations carried out and concluded.
 - Support the EPD in the detection of an event that may be legally classified as an offence.

4.7. CONTROL ENVIRONMENT OF THE MDP

The control environment is the basis of the DMP, as it provides the fundamental guidelines regarding its structure and functioning, and is basically constituted by the policies and procedures of the DMP, as well as the ethical values of the organisation. It consists of, but is not limited to, the following documents:

- Crime Prevention Policy
- Code of Ethics and Conduct
- Internal Rules of Order, Hygiene and Safety.
- Whistleblowing channel and investigation procedure
- Specific policies and procedures.
- Supervision and monitoring plan
- Dissemination and Training

Legal and Labour Instruments.

The legal and labour instruments are the complementary basis of the DMP, which incorporates, but is not limited to, the following documents:

- - Crime Risk Matrix
- - Labour Contract Annex with clauses on compliance with Law No. 20.393.
- - Annex to the Provision of Services with clauses on compliance with Law No. 20.393.
- - Annex to Contractors and/or Suppliers Contract with clauses on compliance with Law No. 20.393.
- - Chapter Internal Rules of Order, Hygiene and Safety, with clauses on compliance with Law No. 20.393 and its subsequent updates and amendments.
- - Contractual Commitment - Contractors and/or Occasional Service Providers.



- - Declaration of Conflict of Interest.
- - Training programme in the light of Law 20.393.

4.8. REPORTING

The EPD shall report quarterly to the Board of Directors and the Audit Committee, informing on the measures and plans implemented in the fulfilment of its duties and giving an account of its management.

The reports to be submitted to the Board of Directors and the Audit Committee shall cover the following **topics**:

- Risk matrix.
 - Deficiencies in the operation and design of controls.
 - Definition of remediation plans.
- Complaints.
 - Complaints received.
 - Status of investigations.
 - Outcome of investigations.
- Proposed sanctions.

5. VALIDITY AND MODIFICATIONS

FECHA	MOTIVO/SUSTENTO	VERSIÓN	RESPONSABLE
14/05/2018	Board Approval	2018-01	Company Directory Sutil
01/06/2018	Entry into force	2018-01	Audit Manager (EPD)
30/05/2019	Incorporation of offences, according to Law 21.121 - Law 21.132	2019-01	Audit Manager
30/06/2020	Incorporation of offences, according to Law 21.127 - Law 21.240	2020-01	Audit Manager
12/05/2021	Incorporation of the Subsidiary Hotel Viña La Playa	2021-01	Audit Manager
19/07/2022	Incorporation of offences, according to Law 21.325 - Law 21.412 - Law 21.459	2022-01	Audit Manager

