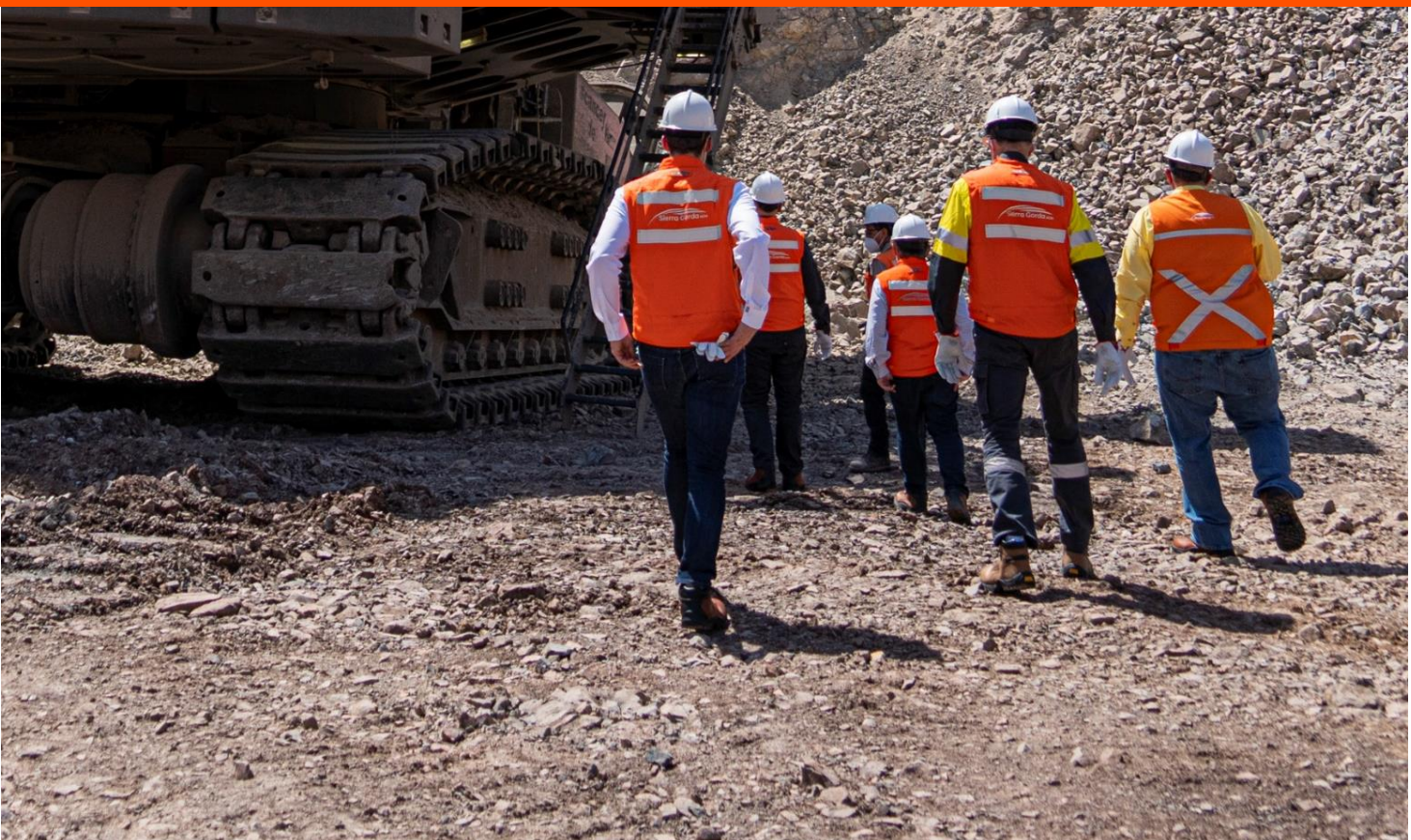




Crime Prevention Policy



I. Context

Law No. 20.393, which entered into force in Chile at the end of 2009, established the criminal liability of legal entities for the crimes of money laundering, financing of terrorism and bribery of public officials. Over the years, the Chilean legislator disposed the extension of the scope of Law No. 20.393 by adding new crimes. Currently, and regarding Law No. 21.595 on Economic Crimes, the catalog of Law 20.393 includes more than 200 crimes.

The liability of legal persons is independent of the criminal liability of natural persons. Therefore, each natural person in the event of the commission of any of the crimes set forth in Law No. 20.393 is liable in accordance with the provisions contained in the Criminal Code, the Code of Criminal Procedure and the Law on Economic Crimes.



II. Objective

The objective of the Crime Prevention Policy is to present the conceptual framework and guidelines for the effective operation of the Crime Prevention Model (CPM) established by Sierra Gorda SCM accordance with the rules of Law No. 20.393. In addition, its objective is to generate an effective prevention environment, through mechanisms for prevention and mitigation of the risks of commission of crimes.

To obtain more information regarding the CPM, including the details of obligations, prohibitions, and sanctions, Sierra Gorda SCM implemented the Crime Prevention Model Procedure and the Manual of Conduct available to each employee on the Intranet.

III. Scope

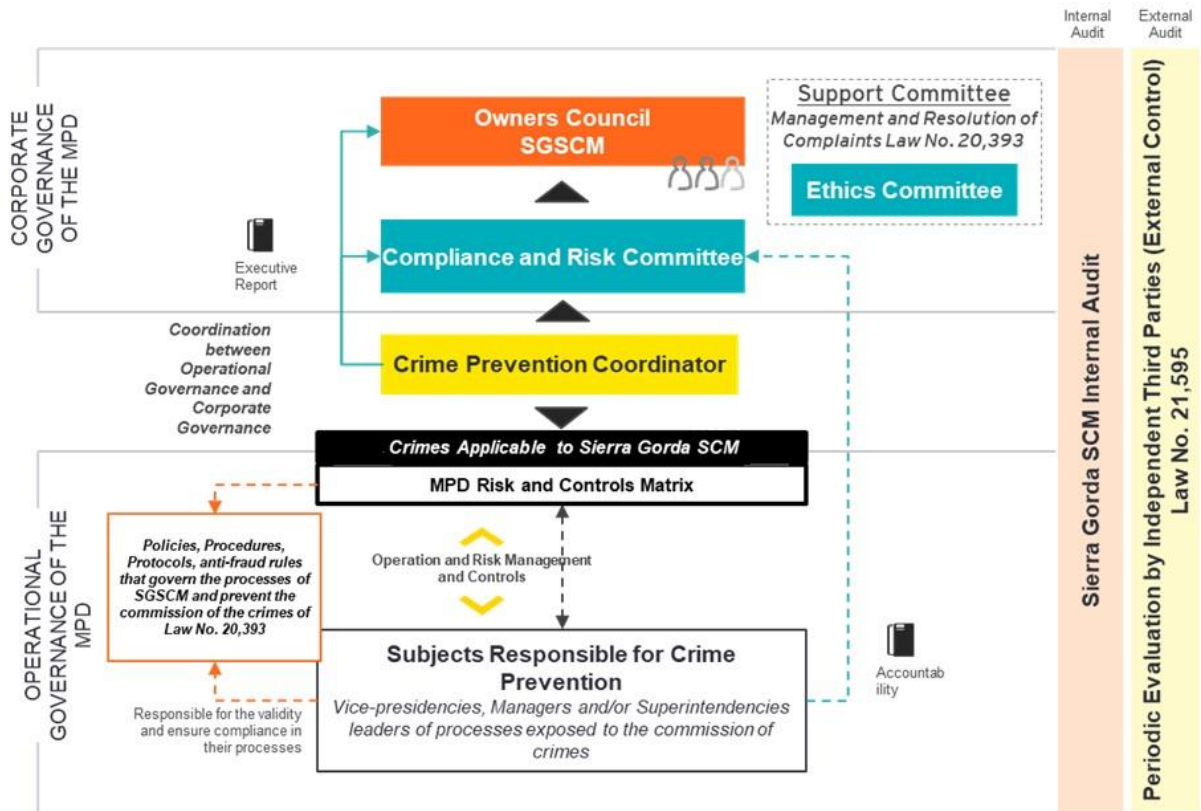
The Policy is applicable to all those who work and provide services for Sierra Gorda SCM. Its scope includes Sierra Gorda SCM Owners Council Members, General Manager, Vice Presidents, Directors, Managers, Superintendents, employees, temporary staff, contractors and advisors.

IV. Main Concepts

Crime Prevention Model (CPM)

The Crime Prevention Model consists of various policies, procedures and activities for prevention, detection, response, supervision and monitoring, which are carried out on processes or activities where the risk of committing the crimes indicated in Law No. 20.393 is generated or increased.

The Sierra Gorda SCM Crime Prevention Model is described in detail in the Procedure of the Crime Prevention Model. It follows a scheme of the CPM of Sierra Gorda SCM:



Crime Prevention Coordinator (CPC)

The Crime Prevention Coordinator is the person designated by the Sierra Gorda SCM Owners Council responsible for the design, maintenance, implementation, monitoring and supervision of the MPD in accordance with Law No. 20.393.

The CPC acts as an advisor to the various Vice Presidents, Managers and/or Superintendents of Sierra Gorda SCM who lead and are responsible for processes that are exposed to the commission of crimes, with the aim of ensuring and verifying their adequate risk management and effectiveness of the internal control environment of such processes.

Subjects Responsible for Crime Prevention

The role is exercised by the hierarchical superiors, Vice Presidents, Managers and/or Superintendents (owners of processes), the responsibility of performing and acting **as Subjects Responsible for Crime Prevention** according to the processes and activities directly exposed to the commission of the crimes of Law No. 20.393, updated by Law No. 21.595, which **are identified in the Matrix of Risks and Controls of the CPM**. Their main task is to review, ensure and maintain the proper functioning of the internal control environment in their respective processes aimed at managing the risks of the commission of crimes under their management. They are also responsible for **keeping the prevention protocols of the MPD up to date and raising awareness among their work teams about their importance and compliance**.

V. Crimes

After the modifications that Law No. 21.595 on Economic Crimes introduced in Law No. 20.393, the number of crimes for which a company may be liable expanded, so that it now includes more than 200. From among them, Sierra Gorda SCM has identified which ones are relevant within the framework of its activities and must be addressed to reduce the risk of them being committed.

Below are several thematic areas illustrating the types of crimes that have been considered feasible to be committed within Sierra Gorda SCM. This list is only by way of example, without referring to all relevant crimes. Their details can be consulted in the can be reviewed in the Manual of Conduct, available on the Intranet or by contacting the Crime Prevention Coordinator.

1. Crimes associated with mining

These include the affectation of mining properties of third parties (milestones and demarcations) and the use of explosives, which must always be done with the respective authorizations. Due to the royalty payment, there are duties of reliable information and collaboration with the CMF as well.

2. Environmental Crimes

Not only certain material effects on the environment (such as polluting and overexploiting resources) can be crimes, but formal aspects (such as not entering to the Environmental Assessment Service when applicable) and not following the instructions or conditions imposed by the authority, can also be criminally punished.

3. Crimes associated with the use of water

As in the environmental aspects, there are crimes provided for the case of contaminating water or extracting it without having the respective rights.

4. Crimes of damage

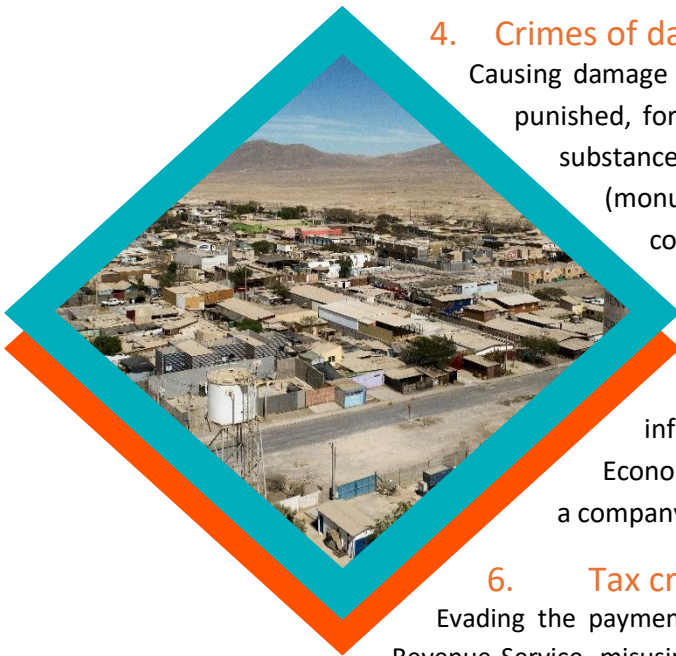
Causing damage to a third party or public property can be criminally punished, for example, care must be taken when using corrosive substances. In particular, damage to national monuments (monuments or archaeological remains) or their theft also constitute crimes.

5. Crimes against free competition

Collusion (the agreement of competitors to fix prices or other competitive variables) and delivering false information or concealing information to the National Economic Prosecutor's Office are economic crimes for which a company can be liable.

6. Tax crimes

Evading the payment of taxes, providing false information to the Internal Revenue Service, misusing donations that grant tax benefits and not complying with customs obligations are some applicable tax crimes.



7. Crimes related to secret information

Some documents or information may be protected by confidentiality duties or be trade secrets. If this type of information is accessed, it should be used with care and not disclosed except where permitted by the owner of the information.

8. Crimes associated with the employer

Certain aspects of the employment relationship, such as taking care of the safety of workers or the proper withholding and payment of social security contributions (AFP, Isapre, etc.), can be associated with crimes if they are not complied with in the way that the law requires. Everyone must have the corresponding safety implements at work and comply with the measures aimed at protecting health and physical integrity.



9. Crimes against probity and respect for third parties

Dealing with third parties, public or private employees, must be appropriate and civilized, avoiding violent behaviors that can lead to threats or fights. Likewise, you should never offer or agree to pay or give gifts to obtain illegitimate advantages (whether from a public body or other private company), avoiding the commission of bribery or bribery.

10. Crimes associated with false documents

Public or private documents should never be falsified by posing as other people at the time of signing, or lying about the facts that are recorded. Nor should documents that are known to be forged be used, even if even if the person using them was not involved in the forgery itself.

11. Crimes against intellectual and industrial property

The use of software must always be with the appropriate licenses, avoiding the use of "pirated" programs or applications whose origin or functionality is not indicated. Likewise, only proprietary trademarks of Sierra Gorda SCM or, exceptionally, those of third parties will be used, provided that the necessary authorizations are obtained. The same applies to other industrial property rights, such as patents.

12. Computer-related crimes

The use of technological programs or devices (such as smartphones, notebooks, tablets, etc.) must always be legitimate, without using such tools to commit crimes, such as scams or hacking (unauthorized access to systems or databases of other people).

13. Property crimes

The receipt and expenditure of resources is a delicate matter. No one should use the name or reputation of Sierra Gorda SCM to deceive third parties and obtain money illegitimately. Checks or other credit instruments shall be issued from accounts that have funds and the true signatures on them must not be disavowed. Financing to political parties or campaigns is not allowed.

14. Receiving and money laundering

It is essential to know the counterparties with whom it is interacted, whether they are suppliers, customers or other types of third parties. Their history and reputation must be verified and actions must be taken based on formalized contracts, keeping the necessary documentation (purchase orders, waybills, invoices, etc.). This care can help to prevent being involved in crimes such as receiving (the acquisition of property from crimes) or money laundering (disguising or concealing the illicit origin of resources).

VI. Areas of the greatest risks

Relationships with third parties and between employees

The existence of relationships between people in the mining industry is not uncommon in Chile. For this reason they are permitted in Sierra Gorda SCM, as long as they are informed during the employee's induction and updated at a later stage of the CPC. At Sierra Gorda SCM, in order to properly manage conflicts of interest, both potential and actual, it is required to immediately report both family relationships and close friendships with:

- Sierra Gorda SCM Suppliers
- Public Officials
- Other employees

Family relationships: relatives by consanguinity and affinity (in-law relatives), in both cases direct and indirect and up to and including the **third degree**. These include e.g.: spouse, father, mother, child, father-in-law, son-in-law, daughter-in-law, grandparent, great-grandparent, grandchild, great-grandchild, sibling, brother-in-law, nephew, uncle.

Close friendship relationships: these include, among others, couples, cohabitants, boyfriends/girlfriends, ex-spouses. In addition, any other person with whom there is or there was a social or business relationship inside or outside of SGSCM (e.g., a former employee)

The details of this area of risk are regulated in Conflict of Interest Policy of Sierra Gorda SCM.

Contracting of services and supply of goods

Sierra Gorda SCM requires its suppliers of goods or services to strictly comply with all laws and regulations that apply to their business processes. To prevent the risks identified in the CPM, suppliers are required to undergo the screening process, including reporting their links with Sierra Gorda SCM employees. In addition, it is the obligation of each Sierra Gorda SCM representative to actively manage potential conflicts of interest and strictly follow the guidelines of the supply area.

Donations, sponsorships and contributions

In Chile, political donations, contributions to political campaigns and facilitation payments are not admissible. Other types of donations and contributions, especially for local communities, are made following the authorization process incorporated in the Community Social Investment Procedure. In addition, Sierra Gorda SCM keeps a record of donations and contributions with evidence of its achievements.

Contacts with the public administration

As part of the Sierra Gorda SCM business, it is necessary to obtain a series of environmental and sectoral permits. It is also necessary to have meetings with authorities or public officials. For this reason, in order to maintain the transparency of relations with the public administration, communications are made through institutional email addresses. In addition, in the case of face-to-face meetings with public officials, the minutes of the meeting are prepared according to the Crime Prevention Model, notifying the Crime Prevention Coordinator.

Environmental responsibility and safety at work in our daily activities

Sierra Gorda SCM is part of an essential industry for economic, technological and operational development in Chile. However, this also entails an important responsibility towards the environment and the safety of our employees and collaborators. Therefore, Sierra Gorda SCM is committed to promoting a culture of prevention and awareness to proactively prevent in any way crimes and/or environmental incidents and occupational accidents, whose guidelines are established in the Health, Safety and Environment Policy.

VII. Obligations and prohibitions

Employees and Collaborators

- Refrain from engaging in conduct that may constitute any of the crimes indicated in the Policy;
- Know and comply with the scope and implications of Law No. 20.393 and the Sierra Gorda SCM Crime Prevention Model, including compliance with the preventive measures implemented therein;
- Report, through the whistleblowing channel, any violation of the rules of the Crime Prevention Policy and Model, or acts or conducts that may constitute any of the crimes contemplated in the Policy, of which they become aware of.

Suppliers

- Refrain from engaging in conducts that may constitute any of the crimes indicated in the Policy, via a contractual clause;
- Report, through the whistleblowing channel, acts or behaviors that potentially could constitute any of the crimes contemplated in the Policy committed by their owners or employees, or by those of Sierra Gorda SCM.

VIII. Penalties provided for in Chilean laws and domestic regulations

For Sierra Gorda SCM

Along with the reputational damage to Sierra Gorda SCM, Law No. 20.393 establishes the following penalties:

- Fines
- Loss of tax benefits and prohibition of receiving them

- Disqualification from contracting with the State
- Cancellation of the corporate entity, i.e. that the company must close
- Supervision by a third party in charge of improving or implementing a prevention system

For Sierra Gorda SCM employees and collaborators

An individual who commits the crime —without prejudice to the labor sanctions indicated in the Internal Regulations— may be criminally prosecuted for his or her individual personal responsibility as perpetrator, accomplice or accessory of the crime. In addition, such individual can be sued civilly, for all the damages and losses that he or she would have caused to Sierra Gorda SCM.

For suppliers

In addition to the sanctions derived from Chilean laws, in case of the commission of a crime, Sierra Gorda SCM establishes the following penalties:

- Written censorship communicated to the management of the supplier.
- Termination of the contract with the supplier in case of serious or repeated misconducts.

In addition, the person responsible for the commission of the criminal offense can be sued civilly for all the damages and losses that he or she have caused to Sierra Gorda.

IX. Whistleblowing Channel

At Sierra Gorda SCM we are committed to an environment of open and honest communications with their direct management, where each of the team members feels respected and inspired by the other members of the team. By creating open communication channels, we can promote a positive work environment and maximize productivity.

However, as an alternative, you also have another option. If you become aware or have a suspicion of a violation of our Company's Values, Code of Business Conduct and Ethics, Crime Prevention Policy, and have a well-founded background, you can safely and anonymously report it, if you wish, by contacting us through the whistleblowing channel. Anyone who files a complaint must act in good faith, with a well-founded background, so we ask that you use this channel responsibly.



Internet: www.sierragorda.ethicspoint.com

Call-free telephones: 800-225-288 / 800-360-312 / 800-800-288,
when accessing the call, dial 855-840-0090

Email: etica@sgscm.cl

Please scan the QR code to Access the **Mobile App**.

*For more information, see Frequently Asked Questions about the Whistleblowing Channel, available on the Sierra Gorda SCM website.



Sworn Statement

I declare for the purposes of the implementation of the Crime Prevention Model of Law No. 20.393, that:

- ♣ I read, fully understood and will comply in all aspects with the Crime Prevention Policy,
- ♣ I have requested and obtained the necessary clarifications on any of the provisions of the Crime Prevention Policy,
- ♣ I will report violations of the Code of Conduct and Ethics and the Crime Prevention Policy by other people in my area of responsibility.