

1. PURPOSE OF THE CRIME PREVENTION MODEL

The Crime Prevention Model (CPM) implemented by Refax Chile S.A. is intended to deter and/or prevent the perpetration of any act that may constitute an offence (as set forth in Law No. 20,393 and any subsequent amendments thereto), within the scope of its activities and to the extent required, considering its corporate purpose, line of business, size, complexity, and available resources. The CPM further provides a reference framework for reporting concerns raised in good faith and/or based on a reasonable belief, on a confidential basis and without fear of retaliation or adverse consequences.

2. SCOPE

This CPM shall apply to all natural persons and legal entities having any relationship with Refax, including, without limitation, directors, managers, executives, administrative staff, representatives, employees, suppliers, customers, service providers, contractors, and subcontractors.

3. CRIME PREVENTION MODEL

The CPM comprises the identification, assessment, and mitigation of the principal criminal risks arising from the processes and activities carried out by Refax, in accordance with the offences set forth in Article 1 of Law No. 20,393.

The risk management methodology underlying the CPM is aligned with the organization's comprehensive risk management policy. Offence-related risks are documented in the Criminal Risk Matrix and are assessed and prioritized based on their potential impact and likelihood of occurrence, taking into consideration the nature of the activities performed by Refax.

In addition, the CPM is comprised of and/or is implemented through the following areas:

1. **Control environment**, which includes, without limitation, the following instruments:
 - a. Risk management policy
 - b. Free Competition Manual
 - c. Reporting and Investigation Procedure
 - d. Asset Management Safeguarding Policy
 - e. Policy on interaction with public officials and/or authorities
 - f. Donations Policy
 - g. Code of Conduct
 - h. Conflict of Interest Policy
 - i. Integrity Channel
2. **Preventive actions** (including communication and training).
3. **Detective actions** (including audits, litigation reports, and reports and investigations), which provide feedback for updating the Criminal Risk Matrix. An integral component of such detective actions is the **Integrity Channel**, through which any person who becomes aware of an irregular situation related to the CPM and Law No. 20,393 may submit a report, either anonymously or with identification. This channel may be accessed at <http://canaldeintegridad.refax.com/>
4. **Response actions** (including disciplinary measures, sanctions, and the review of control activities).
5. **Monitoring**. Key monitoring mechanisms include reporting by the Crime Prevention Officer to the Directors' Committee, and reporting by the Directors' Committee to the Board of Directors.

The governance and oversight of the CPM is the responsibility of the Crime Prevention Officer, together with Refax's Directors' Committee and Board of Directors. In addition, an Ethics Committee is in place to investigate all reports received through the Integrity Channel, in accordance with the principles of objectivity, transparency, and corporate ethics.