



CRIME PREVENTION POLICY

I APPLICATION, SCOPE AND PURPOSE

In compliance with the provisions of Chilean Law No. 20,393 ("the Law"), CMPC has adopted this policy ("the Policy") and implemented a **Crime Prevention Model** ("the MPD", for its initials in Spanish), which are part of its Integrity Program, being applicable to Empresas CMPC S.A. and its subsidiaries established in Chile, including Fundación CMPC ("the Company", "Empresas CMPC" or "CMPC").

Compliance with this policy is mandatory for all individuals who hold or perform a position, duty or post within such entities, without distinction, including directors, executives and employees in general ("the employees").

Compliance with this Policy and the MPD is also mandatory for clients, suppliers and third parties in general who are in any way linked to CMPC, especially those who render services managing the Company's affairs before third parties, with or without powers of representation, or for related parties that lack operational autonomy.

II GENERAL POLICY AND CRIME PREVENTION MODEL

The Company expressly and absolutely prohibits any act or conduct that is unlawful under Chilean Law No. 20,393, as well as under any other related applicable laws and regulations.

As a consequence of the foregoing, and in order to prevent the perpetration of the crimes set out in the aforesaid statute, the Board and the management of Empresas CMPC, exercising and fulfilling their managerial and supervisory duties, have decided to implement a **Crime Prevention Model** applicable both to the parent company as well as to all its local subsidiaries, including Fundación CMPC.

The MPD has been implemented in accordance with the requirements established by law and in line with the **Company's corporate purpose, line of business, size, complexity, resources and activities**. Its main aspects are described below:

1. Identification of the legal entity's activities or processes that may entail a risk of criminal conduct.

The Company carries out a process to identify and assess risks of criminal conduct within the framework of its CMPC Risk Management Program, which is based on the ISO 31000 standard, as well as on the COSO ERM framework and international best practices. As a result, the causes and potential consequences of risk events are identified, as well as the pertinent preventive controls and mitigation measures. Additionally, based on the result of the residual risk assessment, the treatment assigned to the risk is determined, which may include,

as the case may be, the implementation of improvement plans or measures. The result of this process is reported periodically to the Board and the Risk Committee.

2. Establishment of protocols and procedures to prevent and detect criminal conduct.

Preventive controls and mitigating measures associated with risk events, as well as the implemented improvements, are documented in internal rules that are communicated to, included in training programs for, and mandatory for employees, service providers and other third parties, as appropriate. These rules are incorporated in the respective employment and service contracts, including the associated internal sanctions in case of any infringement thereof.

Additionally, CMPC has instituted a secure and confidential whistleblower channel called “CMPC Reporting Hotline”, which can be accessed at **lineadenuncia.cmpc.cl**, and which is available to report events or acts that constitute or may constitute a violation of the Company’s principles and values, its corporate standards or the applicable laws, including Law No. 20,393 and the Crime Prevention Model.

This channel is available to any person, whether employees, suppliers, customers, neighbors or other third parties, in Spanish, Portuguese and English.

This tool allows for the filing of anonymous reports or complaints (if the whistleblower wishes to remain anonymous), while maintaining the confidentiality of the supplied information at all times. The Reporting Hotline is managed by the Corporate Legal Department, the area in charge of investigating complaints – always observing and abiding by the fundamental principles of due process – and of reporting the outcome and corrective measures to the Ethics and Compliance Committee. The Company does not retaliate, nor tolerate retaliation against any party who files a complaint in good faith.

3. Designation of one or more persons in charge.

The Company has designated the **Corporate General Counsel** as the **Crime Prevention Officer** (in Spanish, Encargado de Prevención de Delitos or “EPD”), entrusting him/her with the effective implementation and timely updating of the Crime Prevention Model, as well as with ensuring compliance with its objectives and work plans. In this sense, the EPD is the main person responsible for channeling the duties of reporting, accountability and requests to adopt measures before the Board and other relevant corporate governance bodies.

Additionally, to support the tasks of the EPD, CMPC has designated the **Corporate Risk and Compliance Manager** as the **Person in Charge** for ensuring the proper and timely application of the controls, measures and rules that comprise the MPD and, in general, for the administration of the model’s prevention, detection and response activities.

Finally, in order to optimize the coverage and preventive mission of the model, the Company’s Chief Executive Officer and senior executives have been designated as delegated persons. In this capacity, they are responsible, with respect to the specific area under their supervision, for: (i) identifying risks in processes within their authority and/or position; (ii) executing the control activities and implemented mitigating measures; (iii) integrating the control environment in the operations and business, including its documentation, updating and ongoing training; (iv) providing information to corporate governance bodies; (v) actively collaborating in internal investigation processes; and (vi) opportunely managing incidents or events of risk materialization, including the effective mitigation of their effects, as well as the definition and execution of improvement plans.

The Crime Prevention Officer, the Person in Charge and the Delegated Persons have been granted adequate independence, resources, management and supervisory powers and direct access to the Company’s management, in order to report, in a timely manner, of any measures and plans implemented in the performance of their duties, to account for their tasks, and to require the adoption of any measures deemed necessary for their duties that may go beyond their authority.

4. Periodic evaluations and improvement or updating mechanisms.

Independent third parties appointed by the Company will, from time to time, conduct reviews of the Crime Prevention Model, as required by law, in order to assess its design, implementation and operation. Additionally, and as part of its annual work plan, the Internal Audit Department performs regular reviews of the controls implemented to prevent the perpetration of crimes. The result of both processes contributes to the improvement and/or permanent updating of the MPD, thus ensuring its effective implementation.

III GOVERNANCE OF THE CRIME PREVENTION MODEL

The following are the main functions of the Company's bodies that participate in the governance and operation of the MPD, thus enabling its proper management and supervision.

1. Empresas CMPC's Board

- (a)** Approves the Crime Prevention Model and its most relevant amendments.
- (b)** Appoints the Crime Prevention Officer, the Person in Charge and the Delegated Persons, providing the means and powers for the proper performance of their duties.
- (c)** Receives the EPD's accountability report.
- (d)** Supervises the effective implementation of the MPD and the fulfilment of its objectives.

2. Risk Committee

- (a)** Provides support to the Board in supervising the effective implementation of the MPD and the fulfilment of its objectives.
- (b)** Monitors material risks, as well as their preventive controls and mitigating measures.
- (c)** Follows up on actions or measures to improve the control environment.

3. Internal Audit, Ethics & Compliance Committee

- (a)** Approves and verifies the execution of the annual internal audit plan, and validates the action plans defined to address the identified findings.
- (b)** Reviews the complaints or reports, and the result of the investigations conducted regarding potential violations of the MPD, including the decision to apply disciplinary and/or corrective measures, as appropriate.

4. Chief Executive Officer | Senior Executives

- (a)** Actively promote compliance with the MPD and the commitment of all employees.
- (b)** Provide support to the functions of the EPD, the Person in Charge, and the Delegated Persons.

IV CONTROL ENVIRONMENT – GENERAL FRAMEWORK

Code of Ethics	Presents the Company's principles and values, which guide the conduct of all employees.
Integrity Policy	Presents the Company's commitment and establishes the minimum standards of behavior that the Company expects and requires from its employees to address potential risks of corruption and anti-competitive practices to which the conduction and operation of its business may be exposed.
Crime Prevention Policy	Presents the main elements that make up the Crime Prevention Model adopted by Empresas CMPC and its local subsidiaries (Chile), consistent with the provisions of Chilean Law No. 20,393.
Crime Prevention Procedure and other related internal rules	These instruments establish the specific control activities that must be carried out in the execution of risk processes, in order to prevent the perpetration of crimes.
Legal instruments	Legal documentation that governs the Company's relationship with its employees, clients, suppliers and other third parties.

V DISCIPLINARY MEASURES

Any employees who fail to comply with the Crime Prevention Model, as well as with the Code of Ethics, the Integrity Policy, other internal rules and/or applicable laws, will face disciplinary measures and sanctions under local law, their employment contracts and other internal regulations of the Company. These measures and sanctions may range from reprimands to the termination of their employment, without prejudice to potential civil and criminal actions.

In the case of clients, suppliers and third parties in general that are otherwise related to CMPC, the measures and sanctions contemplated in the respective contracts, agreements or instruments that govern the respective relationship will be applied. These may include immediate termination of the relationship, without prejudice to any civil and criminal actions that may be pertinent.

VI QUERIES AND COMPLAINTS

If any doubts exist regarding the content, scope and application of the Crime Prevention Model, as well as regarding any other internal regulations and applicable laws, particularly in relation to the rules that must be observed in a particular case, employees must refrain from acting and seek advice by immediately contacting the CMPC Corporate Legal Department, through the Corporate Risk and Compliance Department.

Employees must immediately report whenever they suspect or become aware of any conduct, event, or circumstance that constitute or may constitute an infringement of the Crime Prevention Model, as well as the Code of Ethics, the Integrity Policy, other internal rules and/or applicable laws. Complaints must be filed through the “Reporting Hotline” system (lineadenuncia.cmpc.cl), which can be accessed on the Company’s corporate website and the intranet site “Personas CMPC”.

Complaints may be submitted anonymously and proper confidentiality will be maintained during the investigation process, which will be led by the Corporate Legal Department. CMPC will not retaliate, nor tolerate any retaliation against any persons who file complaints in good faith.