



CRIME PREVENTION POLICY

CMPC

I APPLICATION, SCOPE AND OBJECTIVE

In compliance with the provisions of Law No. 20,393 ("the Law"), CMPC has adopted this policy ("the Policy") and implemented a Crime Prevention Model ("the Model", "MPD"), 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 it is mandatory for all persons who hold a position, function or position in such entities, without distinction, including directors, officers and employees in general ("the collaborators").

Compliance with the Policy and the Model is also mandatory for customers, suppliers and third parties in general that are linked to CMPC, especially those who provide services managing the Company's affairs with third parties, with or without their representation, or for related parties who lack operational autonomy.

II GENERAL POLICY AND CRIME PREVENTION MODEL

The Company absolutely prohibits any act or conduct contrary to Law No. 20,393, as well as other related laws and regulations in force.

By virtue of the foregoing, and in order to prevent the commission of the crimes indicated in the aforementioned legal body, the Board of Directors and the administration of Empresas CMPC, in the exercise and fulfillment of their duties of management and supervision, have decided to implement a Crime Prevention Model applicable both to said parent entity and to all its local subsidiaries, including the CMPC Foundation.

The Model has been implemented in accordance with the requirements established in the Law and according to the corporate purpose, business, size, complexity, resources and activities carried out by the Company. Its main aspects are described below:

1. Identification of the activities or processes of the legal entity that involve a risk of criminal conduct

The Company carries out a process of identification and risk assessment of criminal conduct within the framework of its CMPC Risk Management Program, which is based on the ISO 31000 standard, as well as COSO ERM and international best practices. As a result, the potential causes and consequences of risk events are identified, as well as the respective preventive controls and mitigation measures. Additionally, according to the result of the residual risk assessment, its treatment is determined, which may include, as appropriate, the execution of improvement plans or measures. The result of this process is periodically reported to the Board of Directors and the Risks, Audit and Compliance Committee.

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

The preventive controls and mitigating measures associated with risk events, as well as the improvements implemented, are documented in internal rules of mandatory observance by employees, service providers and other third parties as appropriate, which are disseminated through communications and training. These rules are incorporated into the respective employment and service provision contracts, including the associated internal sanctions in case of non-compliance.

In addition, CMPC has a secure reporting channel called "CMPC Reporting Hotline", accessible in lineadenuncia.cmpc.cl, available to report facts or conduct that constitute or may constitute a violation of the Company's principles and values, its rules or current laws, including Law No. 20,393 and the Crime Prevention Model. This channel is available to anyone, whether employees, suppliers, customers, neighbors or other third parties, in Spanish, Portuguese and English. This tool allows anonymous complaints to be made (if the whistleblower so wishes) while maintaining the due confidentiality of the information provided at all times. The Complaints Line is managed by the Corporate Prosecutor's Office, the area responsible for investigating complaints and reporting their result to the Risks, Audit and Compliance Committee. The Company does not take or tolerate retaliation against individuals who report in good faith.

3. Assignment of one or more responsible parties

The Company has appointed the Legal & Compliance Vice-President as the Crime Prevention Officer ("EPD"), who is responsible for the effective implementation and timely updating of the crime prevention model, as well as for the fulfillment of its objectives and work plans. In this sense, the EPD is primarily responsible for channeling the duties of information, accountability and request for the adoption of measures before the Board of Directors and other competent corporate governance bodies.

In addition, in support of the EPD's functions, CMPC has appointed the Corporate Risk and Compliance Manager as the Principal Responsible Entity, in charge of ensuring the due and timely application of the controls, measures and standards that are part of the model and, in general, of the administration of the different prevention, detection and response activities of the same.

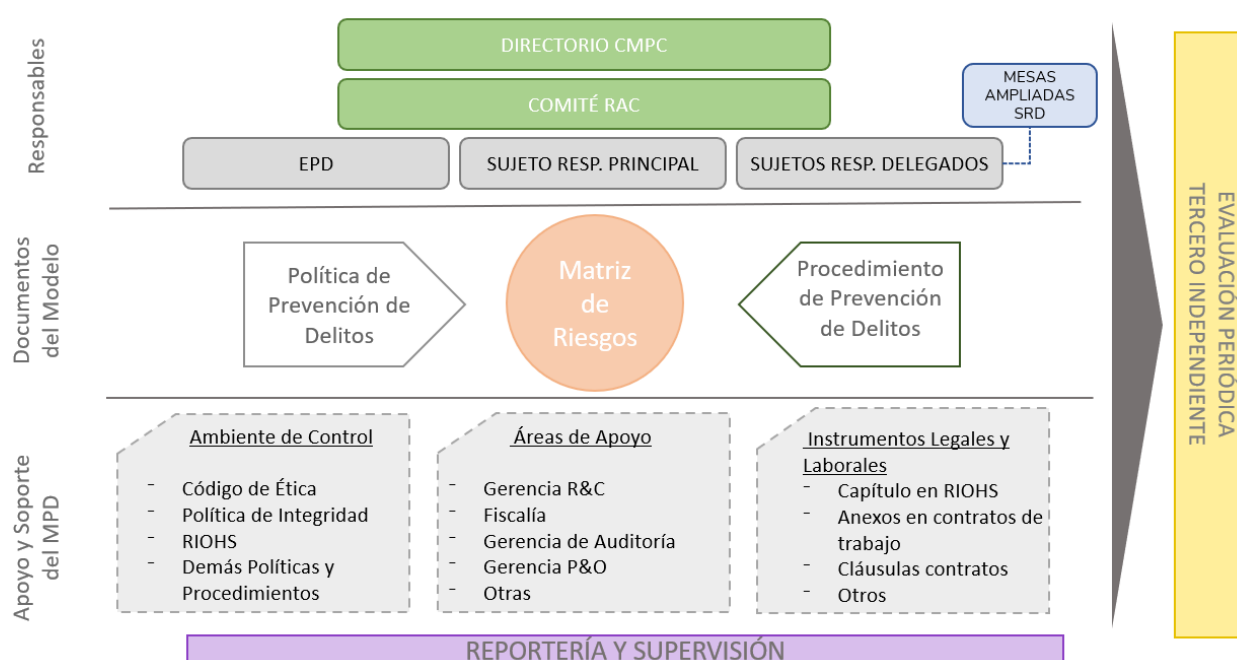
Finally, in order to optimize the coverage and preventive mission of the model, the CEO and the Company's main executives have been designated as Delegated Responsible Subjects. In this capacity, they are responsible for: (i) identifying risks in processes of their competence and/or position; (ii) execute the control activities and mitigating measures implemented; (iii) integrate the control environment into the operation and business, including its documentation, updating and permanent training; (iv) deliver information to corporate governance bodies; (v) actively collaborate in internal investigation processes; and (vi) timely manage incidents or events that materialize risks, including the effective mitigation of their effects, as well as the definition and execution of improvement plans.

All Responsible Parties, i.e., the Crime Prevention Officer, the Principal Responsible Entity and Delegates, have adequate independence, resources, management and supervisory powers and direct access to the Company's management to inform it in a timely manner of the measures and plans implemented in the fulfillment of its mission, to render an account of its management and require the adoption of measures necessary for its mission that could go beyond its competence.

4. Periodic evaluations and mechanisms for improvement or updating

Independent third parties appointed by the Company carry out periodic reviews of the Crime Prevention Model, in the terms required by Law, in order to evaluate its design, implementation and operation. In addition, and as part of its annual work plan, the Internal Audit Management conducts regular reviews of the controls implemented to prevent the commission of crimes. The result of both processes contributes to the improvement and/or permanent updating of the Model, thus guaranteeing its effective implementation.

III GOVERNANCE OF THE CRIME PREVENTION MODEL



A. GOVERNANCE OF THE CRIME PREVENTION MODEL

The Crime Prevention Model is based on three bodies of the Company in charge of its management and supervision, which, through the exercise of their respective functions, ensure the proper management, control and effectiveness of the model.

1. CMPC Business Directory

- (a) Approves the Crime Prevention Model and its most relevant modifications.
- (b) Designates the EPD and the Responsible Parties, providing the means and powers for the proper performance of their functions.
- (c) It hears the EPD's accountability.
- (d) Supervises the effective implementation of the MPD and the fulfillment of its objectives.

2. Risk, Audit and Compliance Committee

- (a) Supports the Board of Directors in overseeing the effective implementation of the MPD and the fulfillment of its objectives.
- (b) Monitors material risks, including preventive controls, mitigating measures, and follow-up on defined actions or improvement measures.
- (c) Approves and monitors the execution of the annual internal audit plan, and follows up on the action plans defined to address the identified findings.
- (d) Knows the complaints and the results of the investigations carried out regarding potential breaches of the Model, including the determination of the disciplinary and/or corrective measures to be applied as appropriate.

3. Responsible Parties

- (a) Promote and ensure the proper implementation of the MPD in the processes under their responsibility, promoting the timely application of the controls, measures and standards that comprise it.
- (b) Proactively identify risks in the processes under their management, execute the control activities and mitigating measures that correspond to them, developing and supporting dissemination and periodic training in their areas.
- (c) Actively collaborate in internal investigations and timely manage detected breaches or deviations of control.
- (d) Propose modifications and update the MPD, within the scope of their competence, as well as the associated policies, procedures and controls.

B. DOCUMENTS AND ENVIRONMENT CONTROL AND SUPPORT

Code of Ethics	It presents the Company's principles and values, which guide the conduct of all employees.
Integrity Policy	It presents the Company's commitment and establishes the minimum standards of behavior that it expects and requires of its employees to face the potential risks of corruption and anticompetitive practices to which the development and operation of its businesses may be exposed.
Crime Prevention Policy	It presents the main elements that make up the Model adopted by Empresas CMPC and its local subsidiaries (Chile) in accordance with the provisions of Law No. 20,393.
Crime Prevention Procedure and other related internal regulations	They establish the specific control activities that must be carried out in the execution of risk processes, in order to prevent the commission of crimes.
Legal instruments	Documentation of a legal nature that regulates the Company's relationship with its employees, customers, suppliers and other third parties that are linked to it.

IV DISCIPLINARY MEASURES

Employees who do not comply with the Crime Prevention Model, as well as with the Code of Ethics, Integrity Policy, other internal rules and applicable laws, will face disciplinary measures and sanctions contemplated in local law, employment contracts and internal regulations of the Company, which may include warnings or terminations of the employment relationship. in addition to possible civil and criminal actions.

In the case of customers, suppliers and third parties in general that are linked to CMPC, the measures and sanctions contemplated in the respective contracts, agreements or instruments that govern said relationship will be applied, including the possibility of immediate termination, without prejudice to the civil and criminal actions that may be appropriate.

V INQUIRIES AND COMPLAINTS

In case of doubts regarding the content, scope and application of the Crime Prevention Model, as well as other internal regulations and applicable laws, particularly in relation to the rules that must be observed in a particular case, employees must refrain from making decisions or actions and seek advice by immediately contacting CMPC's Corporate Prosecutor's Office. through the Corporate Risk and Compliance Management.

Employees must immediately report any suspicion or knowledge they have of conduct, facts or situations that may represent a violation of the Crime Prevention Model, as well as the Code of Ethics, Integrity Policy, other internal rules and applicable laws. Complaints must be reported through the "Reporting Hotline" (lineadenuncia.cmpc.cl) system accessible on the Company's corporate website and the "CMPC People" intranet site.

Complaints may be made anonymously and confidentiality will be guaranteed during the investigation process, which will be led by the Corporate Prosecutor's Office. CMPC will not take or tolerate retaliation against those who report in good faith.

Validity Control

Created by	Risk & Compliance Management
Reviewed by	Crime Prevention Officer
Approved by	CMPC Directory
Date of creation	September 2024
Date of update	September 2025
Version number	04

* This policy may be updated according to internal provisions, always check the current version on the intranet or official site.



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