

BLUMAR

CRIME PREVENTION POLICY

Internal Audit Management
Blumar and Subsidiaries

MARCH 1, 2024

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1. Objective

The purpose of this Corporate Crime Prevention Policy is to establish the guidelines for the adoption, effective implementation, and operation of the Crime Prevention Model of Blumar and its Subsidiaries, in accordance with the provisions of Law No. 20,393 on Criminal Liability of Legal Persons and Law No. 21,595 on Economic and Environmental Crimes.

2. Scope

The scope of this Policy refers to the following companies, hereinafter referred to collectively as “Blumar and Subsidiaries” or the “company.”

- Blumar S.A.
- Pesquera Bahía Caldera S.A.
- Salmones Blumar S.A.
- Salmones Blumar Magallanes SpA.

3. Definitions

- **Administration:** The highest administrative authority of the legal entity, whether it be its Board of Directors, a managing partner, a manager, a chief executive officer, an administrator, a liquidator, its representatives, or its owners or partners, as appropriate to the form of administration of the respective entity.
- **Code of Ethics:** Guide for Board members, executives, and employees, regardless of their hierarchical rank, which promotes conduct based on honesty and integrity in all their actions.
- **Compliance Team:** Internal or external collaborators who have been appointed by the Administration of each company (Board of Directors) to oversee the design, implementation, updating, and control of the Crime Prevention Model. The Compliance Team should have sufficient independence, effective supervisory and managerial powers, and direct access to the Administration to report on management and call for the adoption of specific measures.
- **Crime Prevention Model (CPM):** The Blumar and Subsidiaries Crime Prevention Model is a prevention, detection, response, investigation, supervision, and monitoring system that aims to prevent the commission of the crimes mentioned in Article 1 of Law No. 20,393. This article identifies the activities or courses of action that create or increase the risk of crime and establishes protocols to prevent these risks from materializing.
- **Sanction:** Consequence or result of committing an infraction related to non-compliance with the Crime Prevention Model or any of its associated controls.
- **Criminal liability of legal persons:** Liability that may be attributed to a legal person for the commission of any of the crimes set forth in Article 1 of Law No. 20,393 when the crime is committed as part of the activities carried out by the company, by any person holding a role, function, or position within the company, or providing services to the company by managing its affairs with third parties, and provided that the crime committed

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has been aided or facilitated by the lack of effective implementation of a Crime Prevention Model.

4. Guidelines of the Crime Prevention Model

- Blumar and its Subsidiaries shall ensure that they maintain a model of organization, administration, and supervision adequate for the prevention, detection, and response to the crimes referred to in Article 1 of Law No. 20,393. This is known as the “Blumar and Subsidiaries Crime Prevention Model,” through which the company will strive to prevent the crimes mentioned in said Article. Accordingly, it is expressly forbidden for directors, managers, executives, and collaborators of Blumar and its Subsidiaries, as well as related third parties (contractors, advisors, agents, clients, etc.) to carry out any act that may constitute a crime or any conduct that may give rise to criminal charges against the company.
- The application and oversight of the rules established by the Blumar and Subsidiaries Crime Prevention Model will be the responsibility of a Compliance Team, which will be appointed by the Board of Directors of each of the companies that make up Blumar and its Subsidiaries, for a term that may not exceed three years, renewable for periods of the same duration. The Compliance Team will be led by a “Crime Prevention Model Compliance Officer” who will coordinate the activities to be carried out and report to the Board of Directors regarding the Team’s management.
- The Compliance Team will have the necessary independence in each of the companies that make up Blumar and its Subsidiaries in order to fulfill its duties under the terms established in Article 4, item 3, of Law No. 20,393.
- The Board of Directors of each of the companies that make up Blumar and its Subsidiaries, the Chief Executive Officer, the Committee on Corporate Affairs, Ethics, and Sustainability (hereinafter the “Committee” or “Ethics Committee”) and the Compliance Team shall be jointly responsible for the adoption, implementation, administration, updating, and oversight of the Crime Prevention Model.
- On an annual basis, the Board of Directors of each of the companies comprising Blumar and its Subsidiaries shall provide and/or authorize the provision of sufficient resources, means, and powers (staff, material resources, budget, etc.) to the Compliance Team for the fulfillment of its functions and activities.
- The Compliance Team will have access to information within its purview as well as direct access to the Board of Directors of each of the companies that make up Blumar and its Subsidiaries to inform them in a timely manner of the measures and plans implemented in the performance of its duties, to report on its management, and to call for the adoption of measures necessary for its duties (Item 3, Article 4, Law No. 20,393).
- The Compliance Team will disseminate and communicate the Crime Prevention Model to the employees of Blumar and its Subsidiaries, as well as the roles and responsibilities that emanate from it and the penalties for non-compliance. To this end, it may require the collaboration of different support areas in order to achieve the objectives described

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above.

- Blumar and its Subsidiaries shall ensure compliance with all applicable laws, regulations, and procedures related to the crimes listed in Article 1 of Law No. 20,393.
- The Crime Prevention Model will be updated when relevant changes in business conditions arise, which will be the responsibility of the Compliance Team.
- Every two years, the Crime Prevention Model must be reviewed by independent third parties, and measures to improve and/or update the model must be established based on such reviews (Item 4, Article 4, Law No. 20,393).

5. Roles and Responsibilities

Those responsible for adopting, implementing, managing, updating, and monitoring the Blumar and Subsidiaries Crime Prevention Model have the following roles and responsibilities:

- **Blumar and Subsidiaries Board of Directors:**
 - Appoint one or more persons responsible for applying the protocols and procedures of the Crime Prevention Model (Compliance Team) in accordance with the provisions of Article 4, item 3, of Law No. 20,393. This appointment may be revoked at any time by the Board of Directors and must be renewed every 3 years. Members of the Compliance Team may be re-elected indefinitely.
 - Procure and/or authorize the provision of the necessary resources and material and immaterial means for the Compliance Team to fulfill its roles and responsibilities, in accordance with the size and economic capacity of Blumar and its Subsidiaries.
 - Provide the Compliance Team with direct access so that it may provide timely information on the measures and plans implemented to fulfill its duties, to account for its management, and to call for the adoption of necessary measures for its duties that may go beyond its purview.
 - Give the Compliance Team adequate independence to fulfill its duties and effective supervisory and managerial powers, which must be communicated to the entire organization.
 - Approve the Corporate Crime Prevention Policy and its potential amendments or modifications.
 - Ensure the proper implementation and effective operation of the Crime Prevention Model.
 - Receive and analyze reports on the management and operation of the Crime Prevention Model prepared by the Compliance Team, at least every six months.
 - Inform the Compliance Team whenever a situation is observed that is related to

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Law No. 20,393 and actions taken in connection with the Crime Prevention Model.

- Approve periodic (annual) reviews of the Crime Prevention Model by independent third parties and supervise the implementation of improvement measures based on such reviews.

- **Chief Executive Officer:**

- Ensure the proper implementation and effective operation of the Blumar and Subsidiaries Crime Prevention Model.
- Provide the Compliance Team with the information it needs to perform its duties in relation to the implementation, operation, and effectiveness of the Crime Prevention Model.
- Approve the Corporate Crime Prevention Procedure.
- Approve the Corporate Grievance Procedure.
- Inform the Compliance Team whenever a situation is observed that is related to Law No. 20,393 and actions taken in connection with the Crime Prevention Model.
- Ensure that the Compliance Team has unrestricted access to information and people, as well as ensuring that Crime Prevention Model activities are coordinated where needed.
- Implement the controls under the CEO's responsibility to mitigate the risk of crimes to which the company is exposed or inform the Compliance Team of any new risk that may be identified.

- **Ethics Committee:**

The Ethics Committee shall hold regular meetings every six months and extraordinary meetings whenever required by the Committee to decide on any matter under its responsibility. The Committee's main duties and responsibilities in relation to the Crime Prevention Model are as follows:

- Ensure compliance with the Blumar and Subsidiaries Code of Ethics, its core values and principles.
- Support the Compliance Team in its different control activities, mainly in identifying and analyzing complaints applicable to the Crime Prevention Model and determining possible investigations and sanctions in this regard.
- Request reports from the Compliance Team when circumstances warrant.
- Be informed about the semi-annual report that the Compliance Team makes to

the Board of Directors of each company in Blumar and its Subsidiaries.

- Acknowledge the grievance received, the results of respective investigations, and determine the applicable sanctions in accordance with the proposal made by the Compliance Team.

- **Compliance Team**

- Ensure the proper establishment and operation of the Crime Prevention Model developed and implemented by Blumar and its Subsidiaries.
- Promote that the internal processes and activities of Blumar and its Subsidiaries have effective controls to prevent the risk of the crimes mentioned in Law No. 20,393 and No. 21,595, as well as to keep a record of evidence of compliance with and execution of these controls.
- Propose to and request from the Board of Directors of Blumar and its Subsidiaries the necessary means and resources to carry out its role and responsibilities.
- Train employees on issues covered by Laws No. 20,393 and No. 21,595 and the Crime Prevention Model implemented by Blumar and its Subsidiaries, at least once a year.
- Report to the Board of Directors of Blumar and its Subsidiaries on the operation and management of the Crime Prevention Model, at least semi-annually and/or when circumstances warrant.
- Submit to the Ethics Committee, for its information, the semi-annual report to be presented to the Board of Directors of Blumar and its Subsidiaries.
- Establish and comply with the Corporate Policy and Procedure established in the Crime Prevention Model, as well as develop and implement any other policy and/or procedure deemed necessary to complement or strengthen the control framework of the existing Crime Prevention Model.
- Continuously evaluate the efficacy and relevance of the implemented Crime Prevention Model and its compliance with laws and other regulations, informing the Board of Directors of Blumar and its Subsidiaries when it is necessary or advisable to update it.
- Review any unusual or suspicious grievance or transaction that comes to the attention of Compliance Team by any means, and if deemed necessary, bring the matter to the attention of the Committee and the Board of Directors of Blumar and its Subsidiaries where appropriate. For such a review, the Team shall gather all the documentation related to the transaction and generate a background file.
- Document and store evidence related to crime prevention activities.
- Lead the process of periodic reviews by independent third parties and represent Blumar and its Subsidiaries before the company that reviews the Blumar and

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Subsidiaries Crime Prevention Model.

- Follow up on the recommendations or instructions of independent third parties based on periodic reviews and adopt mechanisms to improve or update the Crime Prevention Model based on the findings of such evaluations.
- Ensure that the Corporate Crime Prevention Policy and Procedure is updated in accordance with regulatory changes and the business environment of Blumar and its Subsidiaries.
- Participate, when appropriate, in lawsuits, grievances, or legal proceedings that Blumar and its Subsidiaries decide to undertake in relation to the crimes mentioned in Article 1 of Law No. 20,393 and provide all the information in possession of the Compliance Team or of which it has knowledge.
- Carry out special tasks that the Board of Directors of each of the companies comprising Blumar and its Subsidiaries entrust to the Team concerning matters within its purview.

- **Support Areas for the Crime Prevention Model:**

The main support areas for the Crime Prevention Model are the following:

- Chief Executive Management.
- Human Resources Management.
- Chief Financial Management.
- Farming Management.
- Commercial Salmon Management.
- Fishing Sales Management.
- Fishing Operations Management.
- Processing Management.
- Logistics Sub-Management.

Other areas will also provide support to the Crime Prevention Model as required.

The control activities entrusted to each support area are detailed in the document “Corporate Crime Prevention Procedure.”

- **Employees, consultants, contractors, and suppliers:**

- These must comply with the provisions of this Policy and the Crime Prevention Model implemented by Blumar and its Subsidiaries.
- They must report situations that might breach the provisions of this Policy and the company's Crime Prevention Model using the established channels.

6. Document Modification

Once the Corporate Crime Prevention Policy comes into force, it will be reviewed and updated as needed by the Compliance Team, which will propose corresponding formal and substantive

changes to the Board of Directors of each company.

VERSION CONTROL			
Version:	Last Update:	Approved by:	Description:
1.0	March 2016	Board of Directors	Creation and first version of the document
2.0	November 2016	Board of Directors	The crime of receiving stolen goods was included and the company "Blumar USA LLC" was eliminated.
3.0	July 2017	Board of Directors	The phrase "Maximum Administrative Authorities of the Subsidiaries" was replaced by "Board of Directors of Salmones Blumar S.A." Modifications were made to the wording in sections: 3. Definitions, 4. Guidelines of the Crime Prevention Model, and 5. Roles and Responsibilities
4.0	July 2019	Board of Directors	Bluriver SpA was included within the scope of Blumar and its Subsidiaries. The definition of bribery of a public official was updated. The crimes of corruption between private parties, inappropriate business dealings, improper management, and misappropriation of Law 21,121 were included. The following crimes were included: extractive activities without an aquaculture concession, in areas of management and exploitation of benthic resources; management of hydrobiological resources in a collapsed or overexploited state, or derived products, without proof of their legal origin; pollution of bodies of water; and management of forbidden hydrobiological resources (Law 21,132).
5.0	May 2021	Board of Directors	The name of Salmones Blumar Magallanes was updated, replacing Bluriver.
6.0	January 2023	Board of Directors	The crimes of arms control, human trafficking, cybercrime, and timber theft were included.
7.0	June 2023	Certification	Adjustments to the wording of the document
8.0	March 2024	Board of Directors	Minor adjustments updating the model due to the incorporation of Law 21,595 on Economic and Environmental Crimes.