BLUMAR

Donations Policy and Procedure Abstract

Blumar and Subsidiaries

March 2021

1. OBJECTIVE

Establish the general guidelines regarding requests for donations, and the description of the process of approval and delivery of these by Blumar S.A. and Subsidiaries.

2. SCOPE

The scope of this Policy refers to all contributions made by Blumar S.A. and its subsidiaries, Pesquera Bahía Caldera S.A., Salmones Blumar S.A. and Salmones Magallanes Blumar SpA.
Hereinafter, these entities will be referred to as "Blumar and Subsidiaries". In addition, this policy is aligned with the Company's Crime Prevention Model.

3. DEFINITIONS

- **Donation:** Act by which and individual or legal entity transfers, free of charge and irrevocably, a part of its assets.
- **Donor:** Individual or legal entity that carries out the act of donating.
- **Donee:** Individual or legal entity that receives the donation (beneficiary).
- **Donation certificate:** Document issued by non-profit organizations, stamped by the Chilean Internal Revenue Service, evidencing the donation.
- **Third Parties:** Any individual or legal entity providing any type of service, whether professional or otherwise, to Blumar and its subsidiaries.

4. GENERAL GUIDELINES

- Donations will be granted only to works, projects, destinations that are located within the areas where the company has operations, that is, Regions III, VIII, XIV, X, XI and XII.
- The amounts of the contributions and their form of distribution will be approved by the Committee designated by the Board of Directors of Blumar S.A.
- Contributions not used in donations within a given year may be provisioned to the following year.
- No donations will be made for political or electoral purposes, nor with the purpose of financing political parties.
- The whole procedure is regulated according to current legislation and considering the scope of Law No. 20.393 of Criminal Liability of Legal Entities. In addition, Blumar and Subsidiaries prohibits the donation of goods or money that could be considered a crime under this law.
- Donations must be made in accordance with the Code of Business Conduct and Ethics, which is a guide for Board members, executives and employees, regardless of their hierarchical rank, and promotes conduct based on rectitude and honesty in each of their actions.
- Charitable contributions to or sponsorship of any type of public and/or private organizations for purposes related to bribery or corruption are completely forbidden.

5. GENERAL PROCEDURE

a. Donation request:

The donee or beneficiary shall:

- Submit a written (letter or e-mail) formal application for donation that must be received by the individual in charge according to the region where the donee is located.
- The application must include:
    - Name of the donee (beneficiary of the donation)
    - Donee's tax identification number
    - Corporate purpose of the donee
    - Goods or money requested
    - Reason for the request
- Wait for a response from the Company.

b. ***Donation evaluation:***

The area that received the application shall:

- Analyze the application and determine whether it is approved or rejected.
- Provide an answer to the applicant (approved or rejected).

If approved, it shall:

- Complete the internal Donation Form with the information provided in the application.
- Request the corresponding authorizations detailed in the Donation Form.
- Invoice the donated goods if applicable.
- Remit the donation application to Human Resources Manager.
- Request the donation certificate and /or donation receipt, as appropriate, from the donee and submit it to the Accounting Sub-Manager.
- Follow up on the destination of the donations made.

c. ***Internal procedures***

Once the application for donations has been received from the area that received the request, the Human Resources Division /Sustainability Area, shall:

- Verify that the Donation Form contains all the required information.
- Prior to processing the donation request, perform complementary activities, in the analysis of the knowledge of the donee, associated to the review of the owners, directors and /or senior executives in lists associated to money laundering, terrorism, fraud and /or historic databases.
- The Human Resources Manager and the Chief Executive Officer authorize the donation as appropriate.
- Refer the background information to the Accounting Sub-Management to evaluate the accounting treatment of the donation.
- Request the donation certificate issued by the donee and/or donation receipt form. In addition to all the documentation required in this policy and maintain control of the accounting of these.
- Maintain all backups of donations on file.

Subsequently, the Accounting Sub-Division shall:

- Receive donation request and verify supporting documentation, when applicable.
- Register the donation in the CSR and Communities account, and appropriately reflect the expenses rejected or others in the accounts for such purposes.
- Instruct how donated goods should be invoiced.

On the other hand, the officer in charge of Crime Prevention:

- Shall conduct a review of the operation and controls of this policy, on a sample of cases, at least semiannually.

Finally, the Chief Executive Officer shall:

- Grant final approval of donations.

d. ***Donation delivery***

Subsequent to the delivery of the donation, the donee shall:

- Provide the donation certificate, when applicable and/or donation receipt form.
- Sign Declaration of Relationship with Politically Exposed Persons.

- Sign Sworn Statement.

6. PROHIBITED DONATIONS

By virtue of the amendment of Law No. 20,900, [which also amended Law No. 19,884 on Transparency, Limits and Control of Electoral Expenditure and the Organic Constitutional Act of Political Parties (Law No. 18,603)], it is expressly **prohibited** all types of donations for political or electoral purposes, and the financing of political parties.

Likewise, it is strictly **forbidden** for Directors, Executives and employees of Blumar and Subsidiaries to receive any kind of donations with the purpose of favoring the contracting of one offeror over another; or to make donations with the purpose of favoring the contracting of Blumar and Subsidiaries over other offerors.