



# Crime Prevention Policy of CCU S.A. and its subsidiaries

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# Index

<b>1. Introduction</b>	3
<b>2. Scope</b>	4
<b>3. Objective</b>	5
<b>4. General Guidelines</b>	5
5. Crime Prevention Model	8
<b>6. Roles and responsibilities</b>	9
6.1. CPM Governance Structure	9
6.2. Board of Directors	10
6.3. Crime Prevention Officer	11
6.4. Responsible Managers	13
6.5. Employees	14
6.6. Suppliers, Advisors and Contractors	15
6.7. Crime Prevention Model Committee	15
<b>7. Disciplinary Measures</b>	16

# 1. Introduction

Law No. 20.393 (hereinafter “the law”) establishes the criminal liability of legal persons, which shall be criminally liable for any of the crimes indicated in article 1 of the law, perpetrated within the framework of their activity by or with the intervention of a natural person who occupies a role, function or position in them, or provides services to them by managing their affairs before third parties, with or without their representation, provided that the perpetration of the act is seen favorably or facilitated by the lack of effective implementation of an adequate model for the prevention of such crimes by the legal person. The implementation of an appropriate model, on the other hand, exempts the legal person from criminal liability and helps prevent their collaborators from becoming involved in criminal acts.

In order to have an adequate and fully-implemented crime prevention model in place to effectively and appropriately manage the main risks of crimes being committed that are contemplated by law and to promote a culture of integrity within the organization, the company has developed its Crime Prevention Model, whose central definitions, structure and operation are described in this document.

## 2. Scope

The scope of this policy (and the Crime Prevention Model established herein) is applicable to Compañía Cerveceras Unidas S.A. and its subsidiaries (hereinafter also “CCU” or the “company”).

This policy is transversal, as the standards defined in this document will be mandatory for all departments, areas, directors, executives, representatives, employees and contractors (natural or legal persons) of CCU and its subsidiaries.

CCU requires that this policy, and any regulations that complement it, be complied with by all of its suppliers and business partners.

Furthermore, the purpose of this policy is to provide instruction and be a guide to conduct, in accordance with the existing legal system relating to issues of the criminal liability of the legal person.

### 3. Objective

CCU is committed to undertaking its business with integrity, complying with the rules that govern it. The company is always inspired to act correctly and contribute to preventing the perpetration of crimes within the framework of the activities of its collaborators.

Through this policy, CCU complies with the requirements detailed in the law, which establishes, among other things, that the company fulfils its duty of supervision and direction, implementing a Crime Prevention Model (hereinafter also “CPM”), the objective of which is to prevent the commission of the crimes contained in said regulation.

### 4. General Guidelines

1. CCU ensures compliance with all applicable laws, regulations and procedures. Directors, executives, representatives, employees and contractors (natural or legal persons) of CCU and its subsidiaries, in Chile and abroad, are expressly prohibited from carrying out any act that may constitute an infraction or crime provided for in Chilean legislation, especially but not exclusively those contained in articles 1, 2, 3 and 4 of Law No. 21.595 and article 1 of Law No. 20.393.

2. CCU maintains a model of organization, administration and supervision appropriate for the prevention of crime, called the Crime Prevention Model, through which the prevention of the commission of crimes established in Law No. 20.393 is promoted.

3. The application and supervision of compliance with the rules established in this model are the responsibility of a Crime Prevention Officer (hereinafter also "CPO"). The CPO is appointed by the company's board of directors. The CPO may only be removed by decision of the board of directors.

4. In the exercise of their functions, the CPO:

a) Will have adequate autonomy and independence, endowed with effective powers of direction and supervision and direct access to the company's senior management. The CPO will have, in particular, direct access to the board of directors, and will not have to obtain authorization from any member of the administration to request reporting information.

b) Will have the assistance of the Crime Prevention Model Committee and the management responsible for the application of controls in the area of their competence.

c) Will report to the company's Board of Directors on a twice-yearly basis and promptly inform the Board of Directors of any non-compliance with the CPM that they consider may eventually constitute one of the crimes whose commission they are trying to prevent, so that the latter may adopt the appropriate measures. It will also be their responsibility to suggest to the Board of Directors the adoption of the measures it deems necessary or convenient to prevent these situations.

d) Will have an annual budget for the proper performance of their functions, from which they may hire any external consultancies they deem necessary to fulfil their duties. They may request an increase in the budget from the board of directors. The Board of Directors shall be required to report these resources annually. Furthermore, the company will provide the necessary material means for the performance of their duties.

e) Will have direct and unrestricted access to the different departments of the organization, in order to:

1. Conduct specific investigations.
2. Monitor the crime prevention system.
3. Request and review information for the execution of their functions.

5. Every company employee shall be obliged to immediately report any incident or act that constitutes or may constitute any of the crimes mentioned in Law No. 20.393. The respective complaint must contain all the data that allows an investigation to be opened into the reported events. For more information regarding reporting procedures, please see the "CCU Reporting Procedure".

6. The CPM includes the activity of identifying and evaluating processes that imply a risk of criminal conduct. The CPO is responsible for the process of identifying and evaluating such risks and for updating the CPM.

7. This policy, once approved by the company's board of directors, will be disseminated among company employees in accordance with the provisions of the law, will form an integral part of employment contracts and will be extended to all contracts for the purchase and sale of goods and the provision of services entered into by the company.

It shall be the responsibility of the CPO to widely disseminate this CPM and arrange for its integration into the aforementioned contracts, as well as to disseminate the complementary rules and relevant provisions of the regulations and other internal rules that govern the company's activities.

8. The CPM must be periodically evaluated by independent third parties in accordance with the provisions of the law.

9. 1. The CPM will be reviewed and, if necessary, updated by the CPO, at least once a year, and whenever relevant changes occur in the business conditions.

## **5. Crime Prevention Model**

The CCU Crime Prevention Model consists of monitoring, through various control activities, the processes or activities that are exposed to the risks of the crimes indicated in Law No. 20.393 being committed, with the objective of preventing said crimes. The administration of this model is the responsibility of the CPO together with the CCU board of directors.

The CPM, in accordance with the provisions of the law, includes the following elements:

1. Identification of the activities or processes of the legal person that constitute a risk of criminal conduct.
2. Establishment of protocols and procedures to prevent and detect criminal conduct in the context of activities involving the risk of criminal conduct.
3. Secure reporting channel.
4. Internal sanctions in case of non-compliance.



5. Assignment of a responsible subject (CPO) for the application of said protocols, with adequate independence, endowed with effective powers of direction and supervision and direct access to the administration of the legal person to inform them in an appropriate manner of the measures and plans implemented in the fulfilment of their mission, to account for their management and to request the adoption of measures necessary for their mission that could go beyond their competence.

6. Provision of periodic evaluations by independent third parties and mechanisms for improvement or updating based on these evaluations.

CCU's CPM contains the elements that allow the company to fulfil its duty of supervision and direction, in accordance with the provisions of the law.

The conceptual diagram illustrating the CPM implemented at CCU is attached in Annex 2 of this document.

## 6. Roles and responsibilities

### 6.1. CPM Governance Structure

The CPM governance structure defined in this policy generates the conditions for the effective management and implementation of its components, in accordance with the roles and responsibilities established below.

The CPM governance structure is headed by the company's board of directors. The board appoints and supervises the CPO, grants them the powers that enable them to carry out their duties and makes the company's central governance decisions.

The CPO is the highest management body in the CPM, responsible for supervising the application of its controls, directly carrying out the oversight and management activities defined by law, updating its content and reporting on its operation to the board of directors.

The CPO is supported in their role by the Crime Prevention Committee and the managers responsible for implementing controls. The managers are responsible for ensuring that the controls and prevention measures defined by law are applied in their areas and for coordinating with the CPO the provision of information on the application of these controls.

## **6.2. Board of Directors**

The leadership and supervision of the CPM is the responsibility of the CCU board of directors, which is responsible for defining its strategy, foundations and guidelines.

- a) Select and appoint the CPO. Only the board may remove the CPO in justified cases. A CPO must be appointed by each of the boards of directors of CCU subsidiaries.
- b) Provide the necessary and reasonable means and resources for the CPO to fulfil their roles and responsibilities.
- c) Approve the policy that establishes the general rules of the CPM, as well as any other modifications that may be proposed in the future.
- d) Receive and evaluate the CPM management and operation reports generated by the CPO, at least twice annually, ensuring the correct implementation and effective operation of the CPM.

e) Ensure the correct implementation and effective operation of the CPM.

### **6.3. Crime Prevention Officer**

The Crime Prevention Officer is the highest authority in CPM management. The CPO has been specifically designated by CCU for the design, implementation, coordination, application, supervision and control of the CPM, being ultimately responsible for its operation and implementation.

a) Exercise the role of central responsible subject of the CPM in accordance with the designation of this position by the CCU board of directors.

b) Ensure the proper functioning and operation of the CPM, developed and implemented by CCU, and comply with it.

c) Suggest to the board, develop and implement any other policy and/or procedure they deem necessary to complement and provide support and effectiveness to the existing CPM.

d) Ensure that the CPM policy and procedures are updated in accordance with regulatory changes and the entity's business environment.

e) Report, at least twice annually, to the CCU Board of Directors on the status of the CPM, matters within their jurisdiction and situations that could eventually constitute a violation of the law and the CPM.

f) Evaluate the effectiveness of the adopted CPM and its compliance with laws and other regulations, informing the board regarding the need and convenience of its modification.

g) a) Ensure the dissemination of the CPM and training of CCU staff on the scope of their functions with respect to the law.

h) a) To know, in cases they deem appropriate or necessary for the exercise of their functions, of all background information, suspicious or unusual transactions and contracts entered into by the company, especially with state-owned companies and, in general, all public services created by law; public or private companies and corporations in which the State or its centralized or decentralized companies, societies or institutions have majority or equal capital contributions, or, under the same conditions, representation or participation, for the purposes of ensuring compliance with the law, the regularity of these transactions and, eventually, to enforce responsibilities when they confirm an infringement of this law or the commission of any of the crimes it seeks to prevent.

i) Strengthen the company's internal processes and activities to have effective controls for preventing crime risks and maintain a record of evidence of compliance and execution of these controls.

j) Cross-check the databases of CCU and its subsidiaries' suppliers and clients with the updated lists of those sanctioned for money laundering and terrorism financing crimes published by organizations such as the United Nations (UN) Security Council and the Office of Foreign Assets Control (OFAC), at least quarterly or whenever they are updated.

k) Document and safeguard evidence relating to crime prevention activities.

l) Direct the internal process leading to CPM certification or evaluations by independent third parties.

- m) Follow up on recommendations or instructions arising from the independent third-party evaluation process.
- n) Intervene, when appropriate, in the claims, complaints or legal proceedings that the company decides to undertake and provide all the background information in their possession or of which they have knowledge by reason of their position.
- o) Prepare reports and carry out studies that the company's board entrusts to them in relation to matters within their competence.
- p) Bring to the attention of the Crime Prevention Model Committee any incidents, internal investigations or complaints that may constitute serious events.
- q) Contract an annual independent external review of the model, in accordance with the guidelines defined by the Crime Prevention Model Committee.

The responsibilities and functions set out above shall apply to the official appointed as substitute when, in the absence of the CPO or for any other circumstance that so warrants, they perform the functions reserved for the CPO. Said substitute shall be appointed by the CPO.

#### **6.4. Responsible Managers**

They are responsible for the effective implementation of the controls defined in the Crime Prevention Model, and will have the following functions:

- a) Supervise the execution of the assigned controls.

b) Inform the CPO of any situation that could constitute a breach of this policy and/or any regulations that complement it.

c) Ensure that the personnel under their charge carry out training.

### **6.5. Employees**

a) Comply with the obligations and duties established in the CPM in relation to their respective employment contracts.

b) Comply with all provisions of the CPM policy, the Code of Business Conduct, the Internal Regulations on Order, Hygiene and Safety and all internal policies and administrative procedures that apply within their jurisdiction.

c) Inform the CPO of any situation observed that is related to non-compliance with the law.

d) Ensure compliance with the controls established in the CPM Risk Matrix.

e) Report any new risks and situations that may go against the policy established here to the CPO.  
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f) Participate in training within the CPM framework.

g) Report or denounce through the complaints channel any situations that may go against the current regulatory framework (internal and external).

## **6.6. Suppliers, Advisors and Contractors**

- a) Comply with the provisions of the clauses relating to the law contained in the respective contracts they sign.
- b) Inform or report through the complaints channel any breach of the current regulatory framework and, in particular, the law.
- c) Comply with the provisions of the Good Practices Guide – CCU Supplier.

## **6.7. Crime Prevention Model Committee**

The Committee is the body responsible for advising the CPO on the implementation and management of the CPM and participating in the decision-making defined in the procedures and policies that require it.

The Crime Prevention Committee will always be made up of the company's Crime Prevention Officer, Legal Affairs Manager and General Comptroller. The committee may rely on internal and external experts.

The functions of the Committee are:

- To advise the CPO on the updating, implementation, development and management of the CPM.
- To be aware of incidents of risk of criminal conduct.
- To define, together with the CPO, the strategic areas of interest to be considered in the independent external evaluation of the corresponding year.

- To understand the external review report and arrange for appropriate improvement decisions to be made.
- To approve updates to the Crime Prevention Model, prior to their submission to the Board of Directors for consideration and approval.
- To convene the Crisis Committee or the Business Conduct Committee in those cases where agreed.
- To present the CPO report on complaints related to possible criminal conduct.

### Functioning

The committee will meet twice monthly and may be convened at the request of its members.

## **7. Disciplinary Measures**

a) Every employee is individually responsible for their actions and undertakes to act in compliance with the principles, values and regulations of CCU.

b) In all operations, whether involving the awarding of contracts, acquisitions, services, suppliers, public or private matters, or others that involve the use of CCU resources, all employees must act with professionalism, honesty, truthfulness, transparency and efficiency, always favoring the legitimate best interest of CCU over any personal preference or contact.



c) It will be the obligation of every employee to understand and faithfully comply with the CPM prepared by CCU.

d) Employees are prohibited from engaging in conduct contrary to the CPM, which the company has made known to each of them through various communication mechanisms.

Any employee who violates any of the regulations on compliance with the CPM will be sanctioned in accordance with the criteria, regulations and procedures established therein, and the regulations and procedures that complement it.