

CCU S.A. AND SUBSIDIARIES CRIME PREVENTION POLICY

August 2020 Edition



I. INTRODUCTION

Law No. 20.393 establishes the criminal liability of legal entities, which will be responsible for crimes committed directly and immediately in their interest or for their benefit, provided that:

- They were committed by their owners, controllers, managers, main executives, representatives or those who carry out administration and supervision, or by individuals who are under the direct management or supervision of any of the aforementioned subjects,
- They are included in the catalog of crimes in the aforementioned law and,
- They are committed as a consequence of the company's failure to comply with management and supervision duties.

II. SCOPE

The scope of this Policy (and the Crime Prevention Model that it establishes) is applicable to Compañía Cerveceras Unidas S.A. and its subsidiaries (hereinafter also “CCU” or the “Company”).

This Policy is transversal, since the regulations defined in this document will mandatorily apply to all departments, areas, directors, executives, representatives, employees and contractors (individuals or legal entities) of CCU and its subsidiaries. Furthermore, the purpose of this Policy is to instruct and serve as a guide to conduct, in accordance with the existing legal framework related to issues of criminal liability of the legal entity.

III. OBJETIVE

Through this Policy, CCU complies with the requirements detailed in Law No. 20.393, which establishes, among other things, that the Company fulfils its management and supervision duties by implementing a Crime Prevention Model (hereinafter also “CPM”), whose objective is to prevent the commission of the crimes contained in said regulation.

IV. GENERAL GUIDELINES

1. CCU ensures compliance with all applicable laws, regulations and procedures. Directors, executives, representatives, employees and contractors (individuals or legal entities) of CCU and its subsidiaries, in Chile and abroad, are expressly prohibited from carrying out any act that may constitute a violation of the aforementioned regulations.

2. CCU maintains an adequate model of organization, administration and supervision for the prevention of crimes, called the Crime Prevention Model, through which the Company promotes the prevention of the commission of the crimes established in Law No. 20.393.

3. The application and oversight of compliance with the regulations established in this Model is the responsibility of an official, with the title of Crime Prevention Officer (hereinafter also "CPO"). The CPO is appointed by the Company's Board of Directors, will serve for up to three years and may be re-elected to the position indefinitely.

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

a) Will be autonomous from the Company's Administration. However, their work is compatible with that of the comptroller or internal auditing as established in Law No. 20.393.

b) Will report every six months to the Company's Board of Directors, to whom they will provide a report on the situation observed during the respective period. They will be subject to promptly informing the Board of Directors about non-compliance with the CPM, which they consider may constitute one of the crimes whose commission they are trying to prevent, so that the appropriate measures can be adopted. Furthermore, it is their duty to suggest to the Board of Directors the adoption of measures deemed necessary or convenient to prevent these situations.

c) Will have an annual budget to properly carry out their functions, with which they may hire external consultants deemed necessary to fulfil their remit. They may also request a budget increase from the Board of Directors. They must report annually on the use of these resources to the Board of Directors. Furthermore, the Company will provide the CPO with the necessary material means to carry out their tasks.

d) Will have direct and unrestricted access to the organization's different departments, in order to:

1. Carry out specific investigations.
2. Facilitate monitoring of the crime prevention system.
3. Request and review information in order to execute their functions.

5. Every employee of the Company will have the obligation to immediately report having learned or become aware of any fact or act that constitutes or may constitute any of the crimes mentioned in Law No. 20.393. The respective complaint must contain all the information to allow an investigation to be opened into the events reported. For more information about the complaint procedures, consult the "CCU Complaints Procedure".

6. The CPM considers the identification and evaluation of crime risks. The CPO is responsible for the process of identification and analysis of said risks. This process will be carried out annually, and also whenever relevant changes occur to the business conditions. Said activity is indicated and documented in the CCU crime risks and controls matrix.

7. Once approved by the Company's Board of Directors, this policy will be disseminated among the Company's employees, in accordance with the provisions of Law No. 20.393. It will form an integral part of employment contracts and will be extended to all contracts for the sale of goods and the provision of services entered into by the Company.

It will be the responsibility of the CPO to widely disseminate this CPM and arrange for it to be integrated into the aforementioned contracts, as well as to disseminate the regulations that are complementary to it, the relevant provisions of the regulations and other internal regulations that govern the Company's activities.

8. The CPM may be certified in accordance with that which is indicated in Law No. 20.393. Said certification will be realized every two years, or according to the frequency established by the Financial Market Commission (FMC).

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

V. CRIME PREVENTION MODEL

The CCU Crime Prevention Model consists of a monitoring process through various control activities for the processes or activities that are exposed to the risks of commission of the crimes indicated in Law No. 20.393, with the objective of preventing such crimes. The administration of this model is the responsibility of the CPO in conjunction with the CCU Board of Directors.

The CPM, in accordance with the provisions of Law No. 20.393, includes the following elements.

1. Designation of a CPO.
2. Definition of means and powers of the CPO.
3. Establishment of a crime prevention system.
4. Supervision and certification of the crime prevention system.

CCU's CPM contains the elements that allow the Company to fulfil its management and supervision duties, in accordance with the provisions of Law No. 20.393.

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

VI. ROLES AND RESPONSIBILITIES

BOARD OF DIRECTORS

- a) To select and appoint the CPO, in accordance with the requirements of Law No. 20.393, for a maximum duration of three years, being able to be re-elected or removed in justified cases. A CPO must be appointed by each of the Boards of Directors of CCU subsidiaries.
- b) To provide the necessary and reasonable means and resources for the CPO to fulfil their roles and responsibilities.
- c) To approve the Policy that establishes the general regulations of the CPM, as well as any other modification that is proposed in the future.
- d) To receive and evaluate the CPM management and operation reports generated by the CPO at least every six months, ensuring the correct implementation and effective operation of the CPM.

CRIME PREVENTION OFFICER

- a) To exercise the role of CPO, as established by Law No. 20.393, and in accordance with the designation of this position by the CCU Board of Directors.
- b) To ensure the correct functioning and operation of the CPM developed and implemented by CCU, and complying with it.
- c) To suggest to the Board of Directors, develop and implement any other policy and/or procedure that is deemed necessary to complement and provide support and effectiveness to the existing CPM.
- d) To ensure the updating of the CPM policy and procedures, in accordance with the entity's regulatory changes and business environment.
- e) To report to the CCU Board of Directors at least every six months on the status of the CPM, matters within its jurisdiction and situations that could eventually constitute a transgression of Law No. 20.393 and the CPM.
- f) To evaluate the effectiveness of the CPM adopted and its compliance with laws and other regulations, informing the Board of Directors about the need for and convenience of its modification.
- g) To ensure dissemination of the CPM and training of CCU personnel on the scope of their functions with respect to Law No. 20.393.
- h) To know, in cases deemed convenient or necessary for the exercise of their functions, of all antecedents, suspicious or unusual operations and contracts that the Company enters into, especially with state companies and, in general, all public services created by law; companies, public or private enterprises in which the State or its companies, enterprises or centralized or decentralized institutions have majority or equal capital contributions, or, under the same conditions, representation or participation, for the purposes of ensuring compliance with Law No. 20.393, the regularity of these operations and, eventually, making effective the responsibilities when a violation of this law or commission of any of the crimes it seeks to prevent is proven.
- i) To develop effective crime risk prevention controls for the company's internal processes and activities and maintain a record of evidence of compliance and execution of these controls.
- j) To cross-reference the database of suppliers and clients of CCU and its subsidiaries with the updated list of terrorists and/or terrorist organizations published by the United Nations (UN) Security Council and the Office of Foreign Assets Control (OFAC), at least on a quarterly basis or every time they are updated.

- k) To document and safeguard evidence related to crime prevention activities.
- l) To direct the internal process for CPM certification.
- m) To follow up on the recommendations or instructions that emanate from the certification process or regulatory entities.
- n) To intervene, when appropriate, in the demands, complaints or judicial actions that the Company decides to undertake and provide all the information that is in their possession or of which they have knowledge due to their position.
- o) To prepare the reports and carry out the studies that the Company's Board of Directors entrusts to them in relation to the matters within their jurisdiction.

The responsibilities and functions established above will apply to the official designated as deputy when, in the absence of the CPO or due to any other circumstance that so warrants, they execute the functions reserved for the CPO. Said deputy will be appointed by the CPO.

ALL STAFF, ADVISORS AND CONTRACTORS

To comply with the provisions of this Policy and the CPM.

- a) To support the CPO by ensuring their unrestricted access to information and people, as well as to support them in coordinating CPM activities in the areas required.
- b) To inform the CPO of any situation observed that relates to non-compliance with Law No. 20.393.
- c) To ensure compliance with the controls established in the CPM Risk Matrix.
- d) To report to the CPO the appearance of new risks and situations that could contravene the Policy established here.
- e) Suppliers, advisors and contractors must comply with the provisions of the Good Practices Guide – CCU Supplier.

ANNEX 1: CCU S.A. AND SUBSIDIARIES DEFINITIONS OF CRIMES

Bribery

Article 250, Penal Code: “Whoever gives, offers or consents to give a public employee an economic or other benefit, for the benefit of the latter or a third party, to carry out an act inherent to their position or to omit or execute an act in violation of the duties of their office, or for having performed or incurred them.”

Article 251 bis, Penal Code: “Whoever, with the purpose of obtaining or maintaining for themselves or a third party any business or advantage in the field of any international transactions or economic activity carried out abroad, offers, promises, gives or agrees to give to a foreign public official an economic or other benefit, for the benefit of the latter or a third party, due to the official’s position, or for them to omit or execute, or for having omitted or executed, an act typical of their position or in violation of the duties of their position.”

Money laundering

Article 27, Law No. 19.913: “Whoever in any way hides or disguises the illicit origin of certain goods, knowing that they come, directly or indirectly, from an illicit act. Or whoever acquires, possesses, has or uses the aforementioned goods for profit when, at the time of receiving them, has known of their illicit origin.”

Terrorist financing

Article 8, Law No. 18.314: “Whoever, by any means, directly or indirectly, collects or provides funds for the purpose of using them in the commission of any terrorist crime.”

Handling stolen goods

Article 456 bis A, Penal Code: “Whoever, knowing or not being able to help but know their origin, has in their possession, under any circumstances, species that are stolen or the object of rustling, and, in receipt or misappropriation under article 470, number 1, transports, buys, sells, transforms or commercializes them in any way, even if they have already been disposed of.”

Private corruption

Article 287 bis, Penal Code: “The employee or agent (from the private sector) who requests or accepts to receive an economic or other benefit, for themselves or a third party, to favor or have favored, in the exercise of their duties, the contracting of one offeror over another.”

Article 287 ter, Penal Code: “Whoever gives, offers or consents to give, to an employee or private sector agent, an economic or other benefit, for themselves or a third party, to favor or have favored the contracting of one offeror over another.”

Improper management

Article 470, No. 11, Penal Code: "Whoever, being in charge of the safeguarding or management of all or part of the assets of another person, by virtue of the law, an order from the authority or an act or contract, causes them harm, whether by exercising powers to dispose of them on their behalf or obligate them, either by executing or omitting any other action in a manner manifestly contrary to the interest of the owner of the affected assets."

Inappropriate business dealings

Article 240, No. 6, Penal Code: "Whoever is in charge of the safeguarding or management of all or part of the assets of another person who is preventing from managing them, who is directly or indirectly interested in any negotiation, action, contract, operation or management in which they must intervene in relation to those assets, failing to comply with the conditions established in the law."

Article 240, No. 7, Penal Code: "The director or manager of a stock corporation that is directly or indirectly interested in any negotiation, action, contract, operation or management that involves the corporation, failing to comply with the conditions established in the law, as well as any person to whom the regulations regarding duties established for the directors or managers of these corporations are applicable."

Misappropriation

Article 470, No. 1, Penal Code: "Whoever, to the detriment of another, appropriates or diverts money, effects or any other goods that have been received in deposit, commission or administration, or by any other title that produces the obligation to deliver or return it."

Water pollution

Article 136, Law No. 21.132: "Whoever, without authorization, or in contravention of their conditions or in violation of applicable regulations, introduces, or orders the introduction into the sea, rivers, lakes or any other body of water, chemical, biological or physical polluting agents that cause damage to hydrobiological resources, will be sanctioned with medium to maximum term imprisonment and fined 100 to 10,000 monthly tax units, in addition to the corresponding administrative sanctions.

Whoever, due to imprudence or mere negligence, executes the conduct described in the previous section will be sanctioned with minimum term imprisonment and fined 50 to 5,000 monthly tax units, in addition to the corresponding administrative sanctions. If the person responsible carries out measures aimed at avoiding or repairing the damage, the court may reduce the custodial sentence by one term and the fine by up to fifty percent, in addition to the corresponding damages. In the case of the second paragraph, there may be a conditional suspension of the appropriate procedure in accordance with article 237 of the Criminal Procedure Code, provided that the measures indicated have been adopted and the fine has been paid."

Commercialization of prohibited products

Article 139, Law No. 21.132: “The processing, accumulation, transformation, transportation, commercialization and storage of prohibited hydrobiological resources, and the production, commercialization and storage of products derived from them, will be sanctioned with minimum to medium term imprisonment, in addition to the corresponding administrative sanctions. To determine the penalty, the volume of hydrobiological resources resulting from the sanctioned behavior will be taken into consideration.”

Illegal extraction of seabed resources

Article 139 bis, Law No. 21.132: “Whoever carries out extractive activities in the management and exploitation of benthic resources, without being the holder of the rights referred to in the final paragraph of article 55 B, will be sanctioned with minimum to maximum term imprisonment. In the event that there are seizures, the highest level of punishment will be imposed. The court will order the confiscation of diving equipment, boats and vehicles used in the commission of the crime. The sanctions provided for in this article will be imposed in addition to the corresponding administrative sanctions.”

Processing, storage or use of scarce products (collapsed or overexploited) without proof of legal origin

Article 139 ter, Law No. 21.132: “Whoever processes, produces or stores hydrobiological resources or products derived from them, with respect to which their legal origin is not proven, and which correspond to resources in a state of collapse or overexploitation, according to the annual report of the Undersecretary’s Office referred to in article 4 A, will be sanctioned with minimum to maximum term imprisonment and fined 20 to 2,000 monthly tax units. The same sanction will be applied to whoever, having the status of seller registered in the registry maintained by the Service in accordance with article 65, commercializes hydrobiological resources that are in a state of collapse or overexploitation, or products derived from them, without proving their legal origin. If the person who carries out the commercialization of the hydrobiological resources that are in a state of collapse or overexploitation, or products derived from them, is a seller without the obligation to be registered in the registry maintained by the Service in accordance with article 65, the sanction will be minimum term imprisonment and a fine of 10 to 100 monthly tax units. The same sanctions will be imposed on whoever has in their possession, in any capacity, the hydrobiological resources or products derived from them that this article addresses, knowing or not being able to help but know their illegal origin. In all the cases addressed in this article, the resources and products derived from them that have been the object of crime will be confiscated, in addition to the corresponding administrative sanctions.”

Obtaining unemployment benefits through fraudulent means

Article 14, Law No. 21.227: “Persons who, in accordance with this law, obtain supplements and/or benefits through simulation or deception, and who, in the same way, obtain a greater benefit than that which corresponds to them, will be sanctioned with medium to maximum term imprisonment. The same sanction will apply to those who provide the means for the commission of such crimes. The foregoing is in addition to the obligation to return the sums unduly received, with the corresponding readjustments according to the law.

Employers that are legal entities will be responsible for the crimes indicated in the previous paragraph that were committed directly and immediately in their interest or for their benefit, by their owners, controllers, managers, main executives, representatives or those who carry out administration and supervision, provided that the commission of such crimes is a consequence of non-compliance by the legal entity with the duties of management and supervision, and will be sanctioned with a fine for fiscal benefit corresponding to double the amount of the benefit unduly received, and a prohibition on entering into acts and contracts with the State for two years.

Under the same provisions of the previous paragraph, employers that are legal entities will also be responsible when said crimes are committed by individuals who are under the direct management or supervision of any of the subjects mentioned in the previous paragraph.

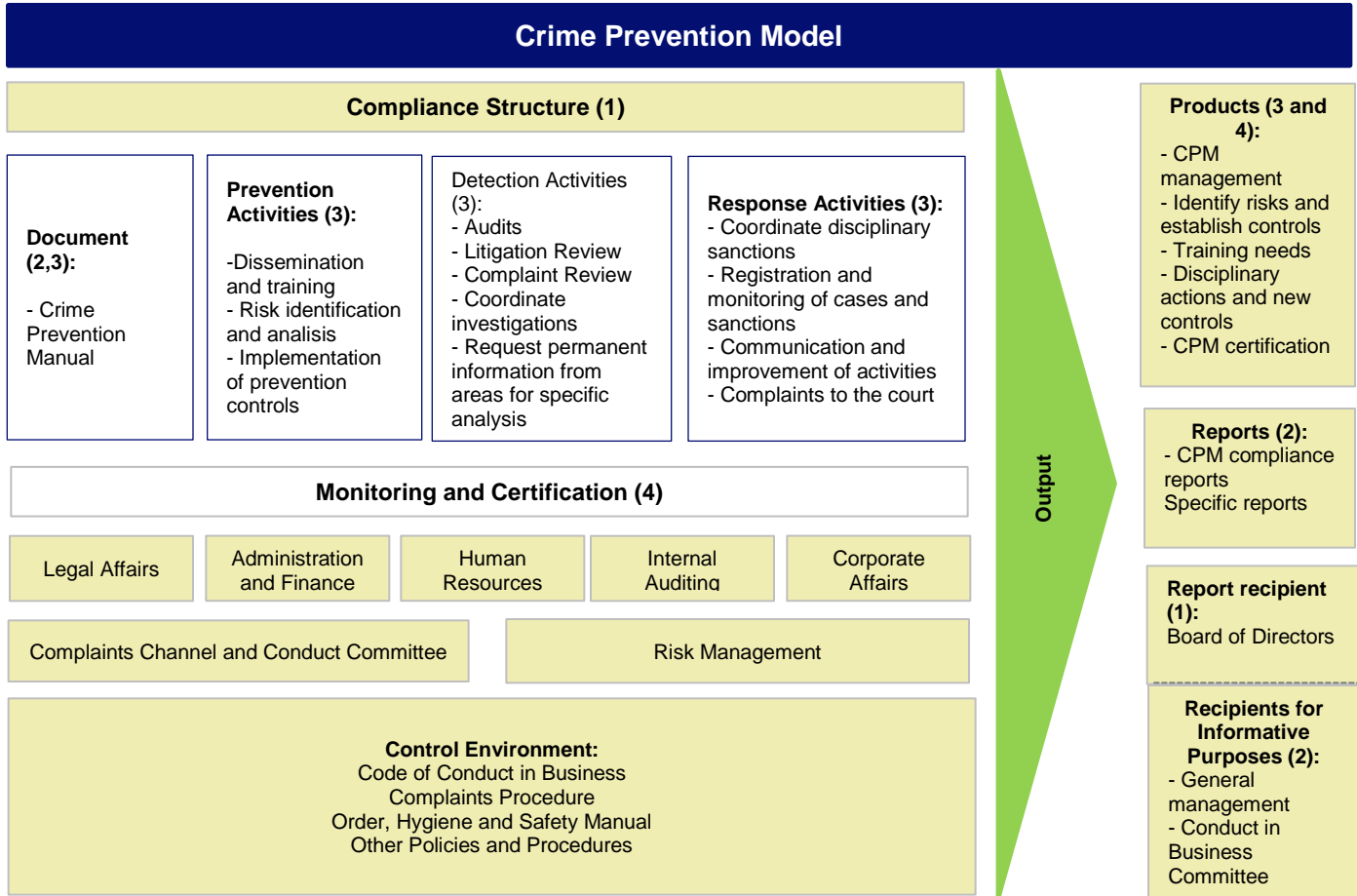
Employers that are legal entities will not be responsible in cases where the individuals indicated in the previous paragraph have committed said crimes exclusively for their own advantage or in favor of a third party.

During the period of validity of this law, that which is provided for in the previous paragraphs will result in the criminal liability of legal entities. For the determination and imposition of their sanctions, as well as the other relevant regulations, it will be understood as a simple crime.”

Forcing a subordinate to violate quarantine or sanitary isolation decreed by the authority

Article 318 ter, Law No. 21.240: “Whoever, knowingly and having authority to stipulate the work of a subordinate, orders them to attend the place where they perform their duties when different from their home or residence, and the worker is in quarantine or mandatory sanitary isolation decreed by the health authority, will be sanctioned with minimum to medium term imprisonment and fined 10 to 200 monthly tax units for each worker who has been ordered to attend. It is important to keep in mind that for the illegal act to be established, it is necessary that whoever orders the worker to attend the workplace knows that the worker was in quarantine or mandatory sanitary isolation decreed by the authority.”

ANNEX 2: CRIME PREVENTION MODEL DIAGRAM



Reference numbers Art. 4 Law 20.393:

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| <ol style="list-style-type: none"> 1. Designation of a prevention officer by the Boards of Directors of all Legal Entities. 2. Definition of means and Powers of the crime prevention officer. | <ol style="list-style-type: none"> 3. Establishment of a crime prevention system. 4. Supervision and certification of the crime prevention system. |
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It is the responsibility of each leader in our Company to take an active role in the adequate dissemination and understanding of this Policy, so that each CCU employee can comply with the established guidelines in performing their respective functions.

Furthermore, all members of our organization must reflect these commitments in their daily relationships with other interested parties.