

CAMANCHACA COMPANY			
MANAGEMENT		Corporate audit and Internal Control & Crime Prevention Management	
DEPARTMENT		Crime Prevention	
DOCUMENT TITLE		Donation policy and procedure	
CODE		PR-CM-EPD-009 v2	
PARTICIPANTS		POSITION	SIGNATURE
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DONATION POLICY AND PROCEDURE

CODE	PR-CM-EPD-009
VERSION	002
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I. Objective

Establish the general guidelines regarding requests for donations, sponsorships or contributions, the description of the approval process and delivery of these by Camanchaca S.A. Company and / or its Affiliates.

II. Scope

This procedure is applicable to all employees of Camanchaca S.A. Company and / or its Affiliates.

III. Definitions

Donation: Act by which a natural or individual transfers a part of their assets free of charge and irrevocably.

Political Donations: any contribution in money, or estimable in money, that is made to a candidate, political party or institute of political training, whether it is materialized in the form of mutual, donation, loan or any act or contract free of charge.

Donor: Natural or legal entity who performs the act of donating.

Beneficiary: Natural or legal entity who receives the donation.

Donation certificate: Document issued by the beneficiary, stamped by the SII that accredits the donation.

Code of Business Conduct and Ethics: Guide for each employee, regardless of their hierarchical rank, that promotes conduct based on behavior, whose hallmarks are rectitude and honesty, in each of their actions.

Crime Prevention Model: Camanchaca's organization, administration and supervision model that includes a set of actions, procedures and controls whose purpose is to mitigate the risks associated with the occurrence of crimes that may involve Camanchaca's criminal responsibility, preventing them.

These crimes are:

- Bribing a national or foreign public official (Law 20,393 - December 2009)
- Financing of Terrorism (Law 20,393 - December 2009)
- Money Laundering (Law 20,393 - December 2009)
- Receiving stolen goods (Law 20.931 - July 2016)
- Improper Negotiation (Law 21.121 - November 2018)
- Bribery between individuals (Law 21,121 - November 2018)
- Misappropriation (Law 21,121 - November 2018)
- Disloyal Administration (Law 21,121 - November 2018)
- Water pollution (Law 21.132 - January 2019)
- Marketing prohibited products (Law 21,132 - January 2019)
- Illegal fishing of marine resources (Law 21.132 - January 2019)
- Preparing, processing and storing collapsed or overexploited products without testifying to their legal origin (Law 21,132 - January 2019)

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IV. Politics

1. All **Political Donations** in accordance with current law must be approved by the Board of Directors of the Company that will make the donation.
2. The rest of the Donations made by the Company must have the following level of approval:
 - a. Donations up to \$ 100,000 must be approved by the Regional Manager.
 - b. Donations up to \$ 500,000 must also be approved by the Division Manager.
 - c. For Santiago (Headquarters) letters a and b may be authorized by the Corporate Finance Manager.
 - d. Donations over \$ 500,000 must also be approved by the Corporate General Manager.
3. Donations must have a social objective, aligned with the "Camanchaca Amiga" program.
4. Donations can be in money, goods (fixed assets, products or others) or services (eg training). If they are in own goods, they will be valued at commercial or market value.
5. Money donations will be made by: personal check, electronic transfer or personal voucher.
6. Any request for donation, contribution and / or sponsorship must be channeled through the Camanchaca Amiga areas of the Human Resources Management of each of the Divisions. Said request must be made formally through the Donation Request Form enabled for this purpose (see Annex I). In the case of Santiago (Headquarters), applications must be sent to the Corporate Human Resources Manager.
7. All donations (Headquarters and Divisions) must be reported semi-annually to the Corporate Finance Management, the Human Resources Manager and the Audit & CPO Manager.
8. Any kind of sponsorship, donation and distribution of collaboration in favor of a person, entity or organization that carries out or promotes activities contrary to the laws, fundamental rights and constitutional norms and, in any case, values, ethical principles is prohibited. and the crime prevention model of the Camanchaca Group of Companies.
9. Donations must comply with the Company's standards for conduct and crime prevention, established in the Code of Business Conduct and Ethics and in the Crime Prevention Model of law 20,393.
10. For each of the Donations made by the Company, there should be no consideration that unduly benefits the Company or any of its employee (s) in relation to the matters indicated in Law 20,393.
11. Additionally, it is required to carry a filing cabinet, with the support of the authorizations and documents that prove the delivery of the property (testimonies and / or photographs).
12. Donations must be duly registered in the respective accounting books.
13. In accordance with the provisions of the Crime Prevention Model, the person or entity benefiting from the donation must sign an affidavit (see Annex II), in which the purpose of the donation is indicated and that it does not contravene the provisions of the Law 20,393 and CPM.
14. A registry of donations must be kept for each of the Divisions (see Annex III), in accordance with the Crime Prevention Model implemented in the Camanchaca Group of Companies.
15. The Regional Management of the respective Divisions is responsible for complying with the provisions of this instruction manual and carrying out the specified controls (points 6 to 14).

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V. Procedure

A. Making and Receiving Complaints

RESPONSIBLE	ACTION
Applicant / Beneficiary	1. Request Camanchaca Company and / or its affiliates a donation and / or sponsorship through the Donation Request form. See form in Annex I .
Human Resources Management / Camanchaca Amiga (Headquarters and Divisions)	2. Receive request made by the potential beneficiary or recipient. 3. Validate that the form is duly completed. In the event of missing information, the missing information must be returned to the applicant for completion. 4. If the form mentions a donation or political contribution, it must be sent to the Crime Prevention Officer for review and presentation to the Board. 5. Complete the application form, with commercial value of the good or species that is requested to donate. 6. Send form for approval and signature to the respective hierarchical level or levels, as stipulated in chapter IV. Policy, number 2 of this document
Regional Manager / Division General Manager / Corporate General Manager	7. Review and approve, by signature, donation request form. 8. Send Donation Request form, approved or rejected, to the Camanchaca Amiga area (Headquarters or Divisions) to manage in case of proceeding
Human Resources Management / Camanchaca Amiga (Headquarters and Divisions)	9. Inform the Applicant / Beneficiary in case the application is rejected. 10. Manage the approved Donation Request and prepare an affidavit. See statement in Annex II. 11. Inform and send a copy of the Authorized Donation Request to: a. Accounting → if it corresponds to a donation in money, to evaluate the accounting-tax treatment. b. Billing → if it corresponds to a donation of goods or species. 12. Maintain an electronic record in Excel (See Annex III) of all donations Camanchaca Company S.A. and / or its Subsidiaries, in addition to a filing cabinet with the support of each operation. 13. Send the electronic record (Excel spreadsheet) with details of all donations made every six months to the Corporate Finance Manager, Human Capital Manager and Audit Manager & CPO.
Accounting	14. Receive Authorized Money Donation Request. 15. Register the provision to make the subsequent payment available.
Treasury	16. Manage donation payment by voucher or personal check. 17. Send payment document to the Camanchaca Amiga area (Human Resources) for delivery to the applicant or beneficiary.

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RESPONSIBLE	ACTION
Billing	18. Receive Request for Donation in goods or authorized species. 19. Issue invoice for donation of goods or species (own products)
Human Capital Management / Camanchaca Amiga (Headquarters and Divisions)	20. Require the Applicant or Beneficiary of the donation to complete and sign the Affidavit of Donations before the formal delivery of the money or the donated property. 21. Deliver or manage donation delivery. 22. Save affidavit.
Applicant / Beneficiary	23. Complete and sign Affidavit of Donations. 24. Receive donation.
CPO	25. Receive a record of donations made every six months. 26. Verify compliance with these regulations and validate the Company's standards on conduct and crime prevention, established in the Code of Business Conduct and Ethics and in the Crime Prevention Model of Law 20,393. 27. Review those requests that are related to donations, sponsorships and / or contributions of a political nature and send to the Board for review and eventual approval.

VI. Penalties for Non-compliance

Failure to comply with the obligations established in this Procedure will be sanctioned in accordance with the provisions indicated in numeral 10 of Article 154 of the Labor Code, which are also established in the Chapters of "Obligations" and "Sanctions", of the Internal Regulations of Order, Hygiene and Safety of Camanchaca SA and its subsidiaries.

VII. Review and / or Update Frequency

This document will be valid for one year, automatically renewable unless its update is required.

VIII. Change Control Table

Version	Modification date	Modified Aspects
001	10-30-2014	- Initial Version
002	04-30-2019	- Document update
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