

Crime Prevention Manual Law 20.393

Antarctica21

Fly & Sail Expeditions

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

Version History – Change Control

The following table lists the updates that have been made to the Crime Prevention Manual of the company Turismo Antártica XXI S.A. RUT 99.523-260-K (hereinafter the “company”), identifying the current version, its date and author.

Document

Document Title	Crime Prevention Manual
Responsibility for Document	Ninoska Águila
E-mail	naguila@antarctica21.com

Document Approval

	Name	Position	Signature
Created	Ninoska Águila O.	Crime Prevention Officer	
Revised	Verónica Peragallo Q.	Finance and Planning Manager	
Approved	Jaime Vásquez S.	President	

Version History

N° Change	Date	Description of Change	Author
1	02-06-2022	Incorporated crimes of human trafficking and arms control	Ninoska Aguila O.
2	23-12-2022	Incorporated computer crimes	Ninoska Aguila O.
3	06-08-2024	Incorporated modifications in accordance with the Economic Crimes Law	Ninoska Aguila O.

Confidentiality note:

This document contains confidential property and information and is subject to the laws, regulations, contracts and agreements that limit the disclosure of the company’s information.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

I Contents

II Law 20.3933

III Objective of the Manual.....5

IV Scope5

V Definitions **iError! Marcador no definido.**

VI Crime Prevention Model **iError! Marcador no definido.**

 VI.1 Designation of a Crime Prevention Officer Law 20.393 (CPO)11

 VI.2 Resources and Powers of the CPO.....11

 VI.3 Establishment of a Crime Prevention System..... **iError! Marcador no definido.**

VII Crime Prevention Policy Law 20.393.....13

 VII.1 Principles and Guidelines of the Crime Prevention Model..... **iError! Marcador no definido.**

 VII.2 Roles and Responsibilities..... **iError! Marcador no definido.**

 VII.2.1 Of the Board of Directors **iError! Marcador no definido.**

 VII.2.2 Responsibilities of the CPO **iError! Marcador no definido.**

 VII.2.3 General Management **iError! Marcador no definido.**

 VII.2.4 Managers **iError! Marcador no definido.**

VIII Crime Prevention Procedures Law 20.39316

 VIII.1 Prevention Activities..... **iError! Marcador no definido.**

 VIII.2 Detection Activities.....18

 VIII.3 Response Activities18

 VIII.4 Supervision and Monitoring19

 VIII.5 Control Environment20

 VIII.6 Support Areas21

 VIII.7 Output: Reports and Whistleblowing21

IX General Ethics Guidelines22

 IX.1 Standards of Conduct22

X Whistleblowing Procedure.....23

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

II Law 20.393

On December 2, 2009, **Law N°20.393** was published in the *Diario Oficial*, which “Establishes the criminal responsibilities of legal entities”. This law has been modified over time in various ways, incorporating different crimes within the list of those subject to liability.

The crimes for which legal entities are criminally liable under Law 20.393 are the following:

1. The crimes referred to in articles 1, 2, 3 and 4 of the Economic Crimes Law, whether or not they are considered economic crimes under that law.
2. Those crimes stipulated in Article 8 of Law 18.314, which identifies different forms of terrorist conduct and establishes their penalties; also in Title II of Law 17.798 regarding Arms Control, and in articles 411c (money laundering), 448f (bribery) and 448g (influence peddling) of the Penal Code.

A legal entity shall be criminally liable for any of the above crimes if perpetrated by or involving any natural person, in the context of its activity, that occupies an office, function or position within it, or who provides services to it by managing its affairs in relation to third parties, with or without its representation, as long as the perpetration of the act is enabled or facilitated by the lack of effective implementation of an adequate crime prevention model (hereinafter also CPM), on behalf of the legal entity.

If the requirements set forth in the preceding paragraph are met, a legal entity shall also be responsible for the act perpetrated by, or with the intervention of, a natural person related, in the terms set forth in the preceding paragraph, to a different legal entity, provided that said entity renders services to the entity responsible by managing its affairs in relation to third parties, with or without its representation, or lacks operational autonomy in this respect, when there are proprietary or participatory relations between them.

That described above will not be applicable when the punishable act is perpetrated exclusively against the same legal entity.

Law 20.393 stipulates that a crime prevention model that is effectively implemented by the legal entity shall be understood to be adequate for the purposes of exempting that entity from criminal liability when, to the extent required by its corporate purpose, operations, size, complexity, resources, and the activities it carries out, the model seriously and reasonably considers the following matters:

1. The identification of the legal entity’s activities or processes which imply a risk of criminal conduct.
2. The establishment of protocols and procedures to prevent and detect criminal conduct in the context of the activities referred to in the previous number. These must consider secure whistleblowing channels and internal sanctions in the event of non-compliance.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

These protocols and procedures, including internal sanctions, must be communicated to all workers. The internal regulations must be expressly incorporated in the respective work contracts and service contracts of all workers, employees and service providers of the legal entity, including its top executives.

3. The delegation of one or more persons to be responsible for the application of the above protocols. Said person(s) shall be granted adequate independence and effective powers of direction and supervision, as well as direct access to the legal entity's administration in order to inform it, in a timely manner, of the measures and plans that have been implemented in the fulfillment of this mission, which may exceed his/her/their sphere of competence. The legal entity shall provide the responsible person(s) with the material and immaterial resources and means that are necessary to adequately carry out these tasks, taking into account the size and economic capacity of the legal entity.

4. The provision of periodic evaluations by independent third parties as well as procedures for improvement and updating based on those evaluations.

In response to this scenario, the company **Turismo Antártica XXI S.A.** RUT 99.523-260-K, hereinafter the "company", acting in good faith and committed to the current legal framework, has adopted and implemented a model of organization, administration and supervision to effectively prevent and sanction the commission of the crimes referred to. This model is hereinafter referred to as the **Crime Prevention Model**, or **CPM**.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

III Objective of the Manual

The objective of the present manual is to establish the operational guidelines of the corporate Crime Prevention Model, CPM, and the procedures that enable its implementation and operation. This includes a description of the operational activities which it undertakes in order to strictly comply with the laws, rules and regulations that are designed to prevent illicit operations related to Law 20.393 concerning the Criminal Liability of Legal Entities.

IV Scope

The guidelines established in this Crime Prevention Model will be applied to each and every member of the company, including its Directors, General Managers, Managers, Assistant Managers, Department Heads, Professionals, Administrative Staff and all its personnel, as well as providers and service providers.

V Definitions

The following definitions facilitate the understanding of the main concepts that are referred to in this Manual:

CRIME: A typical conduct, action or omission, as defined in the law, which is illegal (contrary to the law) and if a person is found guilty carries a sanction, which is understood as a penalty, with objective conditions of punishment.

ASSET LAUNDERING: According to Article 27 of Law 19.913, this is defined as: “Any act tending to conceal or disguise the illicit origin of certain assets with the knowledge that they are derived from the perpetration of crimes related to the illicit trafficking of drugs or arms, terrorism, the promotion of child prostitution, abduction, bribery, or other crimes”.

FUNDING OF TERRORISM: According to Article 8, Law 18.314, this is defined as: “A natural person or legal entity that in any way solicits, collects or provides funds for the purpose of being used to commit any type of terrorist crime. This includes, for example, hijacking or attacking a means of public transportation, attacking a head of state or any other authority, illicit associations with the intention to commit terrorist crimes, among other activities”.

BRIBERY OF A NATIONAL PUBLIC OFFICIAL: According to Article 250 of the Penal Code: “This is defined as offering or consenting to give a public employee an economic benefit or any other type of benefit, whether for their own profit or for that of a third party”, so that:

- He/she carries out acts within his/her position which he/she has not been authorized to perform.
- He/she neglects to perform an act which is the duty of his/her office.
- He/she carries out an act which is in violation of the duties of his/her office.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

BRIBERY OF A FOREIGN PUBLIC OFFICER: According to Article 251 of the Penal Code: “This is defined as offering or intending to give a foreign public officer an economic or another kind of reward, for their benefit or that of a third party”, so that:

- He/she carries out an act or neglects to perform an act in hope of obtaining or maintaining any business or undue advantage related to any type of international transaction.

FENCING: This is defined as having in one’s possession, under any title, when one knows the origin or could not help but know it, stolen livestock species, objects of cattle rustling, or misappropriated or stolen goods; and, having received or misappropriated them, transports, buys, sells, transforms or commercializes them in any way, even if he/she has already disposed of them.

INCOMPATIBLE TRADING: Direct or indirect interest in any negotiation, action, contract, operation or transaction in which one must intervene, whether relating to one’s position, assets or patrimony, or related non-compliance with conditions established by law.

CORRUPTION BETWEEN INDIVIDUALS: Solicit or accept, receive or give, offer or consent to give, an economic or other type of reward to oneself or to a third party; or to favor or have favored, in the exercise of one’s duties, a contract with one bidder over another.

UNDUE APPROPRIATION: When, to the detriment of another individual, one appropriates or diverts money, property, or any other type of liquidity that has been received for deposit, collection or administration, or with any other obligation to deliver or return it.

IMPROPER ASSET MANAGEMENT: When a manager of assets causes damage to those assets, either by abusively exercising his/her powers to use them for his/her own interests, or by executing or omitting an action in a manner that is contrary to the interests of the owner of the affected assets.

INTRODUCTION OF CONTAMINATING AGENTS: When, without authorization, in disregard of conditions, or in violation of applicable regulations, one introduces or orders others to introduce into the sea, rivers, lakes or other bodies of water, any contaminating biological, chemical or physical agents that cause damage to the hydrobiological resources.

ORDER A WORKER IN QUARANTINE OR MANDATORY SANITARY ISOLATION TO ATTEND THE WORKPLACE: When a worker is in quarantine or mandatory sanitary isolation and a person with authority over his/her position knowingly orders him/her to attend the workplace to carry out his/her labors, when this is different from his/her domicile or residence.

ADMINISTRATION OF THE LEGAL ENTITY: Article 4 of Law 20.393 defines the Administration of the Legal Entity as the highest administrative authority. This may be its Board of Directors, a managing partner, a chief executive, an administrator, a liquidator, its representatives, its owners or its partners, as appropriate to the form of administration of the legal entity, hereinafter the “Administration of the Legal Entity”.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

HUMAN TRAFFICKING: Using violence, intimidation, coercion, deception, or abuse of power, taking advantage of a victim's vulnerability or dependency, or granting or receiving payments or other benefits to obtain the consent of one person with authority over another, in order to recruit, transfer, harbor or receive persons to be subjected to any form of sexual exploitation, including pornography, forced labor or services, servitude, slavery or practices similar to slavery, or the removal of organs.

ARMS CONTROL: Crimes under Title II of Law No. 17. 798 on Arms Control, such as those established for: individuals who organize, belong to, finance, equip, assist, instruct or incite the creation and operation of private militias, combat groups or militarily organized parties; the carrying, possession or ownership of firearms or explosives without the corresponding authorizations or registrations; the commercialization, manufacture, importation or introduction into the country of prohibited or controlled arms, devices or ammunition; and the sale of ammunition or cartridges to a person who is not the owner, guardian or carrier of a registered firearm, among others.

ATTACK ON THE INTEGRITY OF A COMPUTER SYSTEM: Hindering or preventing the normal operation, in whole or in part, of a computer system, through the introduction, transmission, damage, degradation, alteration, or suppression of computer data.

ILLICIT ACCESS: Accessing a computer system without authorization or exceeding the authorization one has by bypassing technical barriers or technological security measures.

ILLICIT INTERCEPTION: Illicitly intercepting, interrupting or interfering with, by technical means, the non-public transmission of information within a computer system or between two or more systems.

ATTACK ON THE INTEGRITY OF COMPUTER DATA: Illicitly altering, damaging or deleting computer data.

COMPUTER DATA FORGERY: Improperly introducing, altering, damaging or deleting computer data with the intention that these be taken as authentic or used to generate authentic documents.

FENCING OF COMPUTER DATA: When one, knowing its origin or not, commercializes, transfers or stores, in any way and with any illicit purpose, computer data that arises from the conducts described in articles 2°, 3° and 5°.

COMPUTER FRAUD: When one causes damage to another with the purpose of obtaining an economic benefit for him/herself or for a third party, by manipulating a computer system through the introduction, alteration, damage or suppression of computer data, or through any interference in its operation.

ABUSE OF DEVICES: When one, for the perpetration of crimes stipulated in Articles 1 to 4 of this Law, or of conducts indicated in Article 7 of Law No. 20.009, delivers, obtains, imports, disseminates or makes available in any other way one or more devices, computer programs, passwords, security or access codes or other similar data, which have been created or adapted principally for the perpetration of such crimes.

FRAUD: Refers to the commission of deceptive, fraudulent or unfair acts with the intent to obtain an undue benefit or cause harm to another person. This concept may manifest in various forms, including financial fraud, scams and manipulation of information.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

SCAM: When someone uses deception to induce another person to perform an action or make a decision that results in a financial loss, either for him/herself or for a third party.

CRIMES AGAINST THE ANTARCTIC ENVIRONMENT. When one, without the corresponding authorization in accordance with the law:

1. Handles or abuses a mammal, bird or cephalopod that is native to Antarctica or the Southern Ocean.
2. Removes or damages plants or algae native to Antarctica or the Southern Ocean in such quantities as to significantly affect their local distribution or abundance.
3. Introduces non-native or exotic species of animals or vegetation in Antarctica or in the Southern Ocean.
4. Engages in harmful interference under the terms of this law. The penalty shall only be a fine in cases indicated under letter f) of number 8 of article 5 of this law, provided that a greater penalty does not correspond to this article.
5. Damages or moves a historic site or monument, classified as such under the Antarctic Treaty System.

Furthermore, one will be sanctioned if, without obtaining the corresponding authorization or in breach of the Antarctic Treaty System, they:

1. Engage in prospecting, exploration, or other mining activities in Antarctica, the Southern Ocean or on the Antarctic continental shelf.
2. Dispose of contaminating substances in the Southern Ocean, negatively affecting the marine environment.

For the purposes of this offense, negatively affecting the marine environment shall be understood as adverse and measurable changes that involve of any of the following circumstances:

- a. Having an impact of a relevant magnitude, according to the ecological or geographic characteristics of the contaminated area of the Southern Ocean.
 - b. Having effects that are prolonged over time.
 - c. Being irreparable or difficult to repair.
 - d. Affecting a significant number of species.
3. Release petroleum hydrocarbons (oil) or petroleum mixtures into the Southern Ocean.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

In this case, the court shall consider it an attenuating circumstance when the release of petroleum hydrocarbons or petroleum mixtures was the result of damage suffered by a vessel or its equipment, provided that, subsequently, the offender acted diligently to prevent a greater spill.

4. Anyone who, without the corresponding authorization, produces, possesses, distributes, introduces or disposes of nuclear or radioactive materials in Antarctica or the Southern Ocean.

CRIME PREVENTION OFFICER (CPO): The person appointed by the legal entity's highest administrative authority who is responsible for the implementation, supervision, operation and compliance with the Crime Prevention Model, as well as its updating. This position will have a duration of up to three years, which may be extended for periods of the same duration.

SANCTION: Consequence or effect of committing an infraction associated with non-compliance with the Crime Prevention Model and any of its associated measures.

CPM CONTENT MANAGEMENT SYSTEM: A physical or digital system that allows for creating a support and administration structure for the files and documents that are complementary to the Crime Prevention Model.

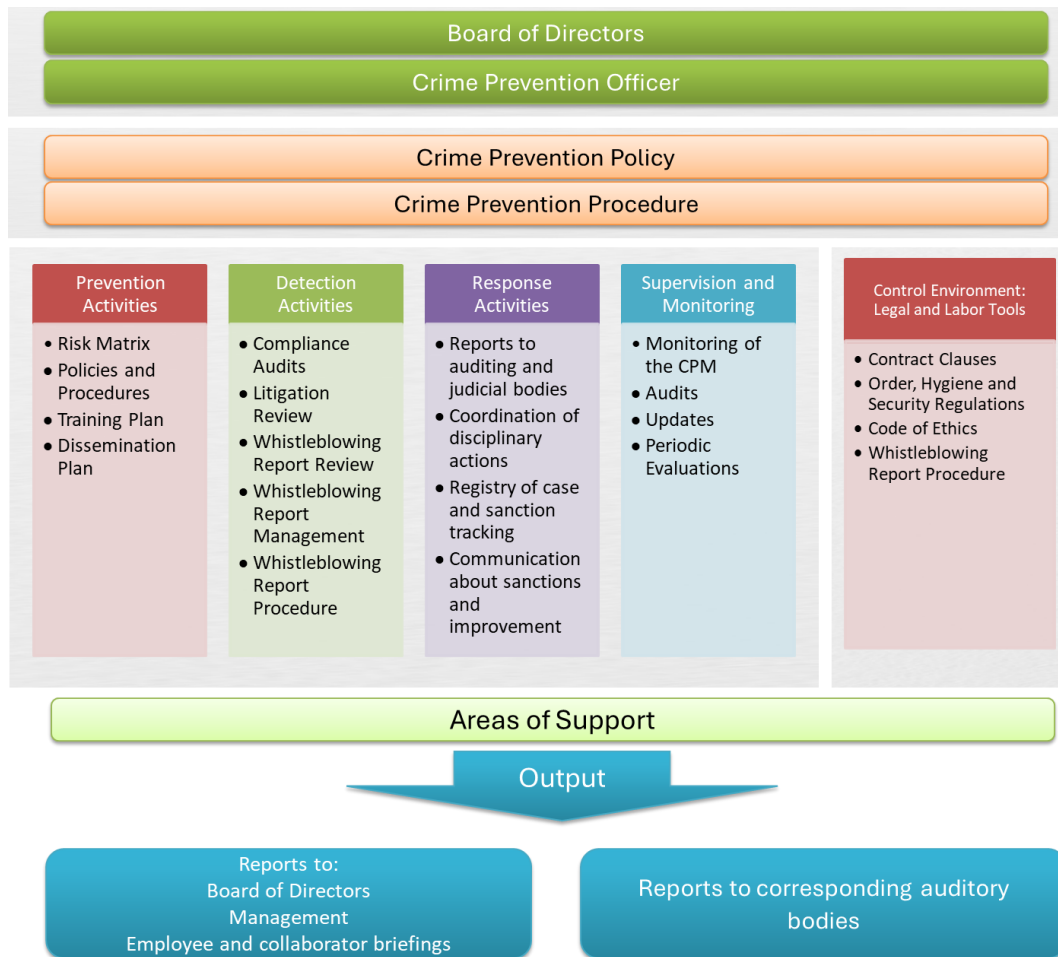
It is understood that all the documents identified as integral parts of this manual, such as policies, procedures, minutes, among others, must be stored in this container either in digital or physical format and must always correspond to the most up-to-date version.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

VI Crime Prevention Model

ANTARCTICA21’s Crime Prevention Model has an organizational and operational structure that enables various prevention measures to be carried out, for detection and response, in relation to the activities within the company that are exposed to risk of the crimes identified in Law 20.393.

The CPM diagram is designed in the following way:



This visual representation shows that the Model has as its highest administrative authority the Board of Directors. They appoint a Crime Prevention Officer who, in turn, coordinates Policies and Procedures for generating Crime Prevention, Detection, Response, Supervision and Monitoring activities, and he/she also establishes a responsible work environment.

Each activity in the Model is also supported by the different areas of the company and its external advisors.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

This Model enables the company to react in a timely and effective manner when a crime is reported or committed, informing the Board of Directors, employees, and supervisory bodies, while at the same time correcting its own structure to prevent any subsequent commission of the acts involved, and always safeguarding the confidentiality of the informant.

VI.1 Designation of a Crime Prevention Officer Law 20.393 (CPO)

ANTARCTICA21, through its highest administrative authorities, in this case the Board of Directors, shall designate a Crime Prevention Officer (hereinafter CPO). The duration of the role of the CPO shall be 3 years, which may be prolonged by the Board of Directors for periods of the same duration.

The CPO shall have autonomy with respect to the Legal Entity’s Administration (the Board of Directors), as well as its owners, partners, shareholders, and controllers. For this reason, Antarctica21, through its highest administrative authority, grants the CPO, via act of its Board of Directors, full autonomy when executing the tasks related to this office, independent of his/her normal work responsibilities.

The identification of the Crime Prevention Officer as well as his/her respective designation can be found in the CPM’s Content Management System. Communications to personnel and partners about the act of designation can be found in the same system.

VI.2 Resources and Powers of CPO

In accordance with Law 20.393, the Legal Entity’s Administration must provide the Crime Prevention Officer with the resources and powers necessary to carry out his/her functions, which shall include at least the following:

- a) The material resources and powers necessary to adequately carry out his/her duties, considering the size and economic capacity of the legal entity.

- b) Direct access to the Administration of the Legal Entity, in order to inform them in a timely manner, and through an appropriate medium, of the measures and plans he/she has implemented to perform his/her duties, and in order to provide an account of his/her actions. This report will be made at least every 6 months.

VI.3 Establishment of a Crime Prevention System

In accordance with Law 20.393, the Crime Prevention Officer, together with the Legal Entity’s Administration, shall establish a crime prevention system for the legal entity, which shall include at least the following:

- 1. Identification of the legal entity’s activities or processes that implicate risk of criminal conduct.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

2. Establishment of protocols and procedures to prevent and detect criminal conduct in the context of the activities referred to above, which must include secure whistleblowing channels and internal sanctions in cases of non-compliance.

These protocols and procedures, including internal sanctions, shall be communicated to all workers. The internal regulations shall be incorporated within the respective work contracts and service provision contracts of all the legal entity’s workers, employees and service providers, including its highest executives.

3. Assignment of one or more individuals responsible for applying the above protocols, who shall be endowed with adequate independence, effective powers of direction and supervision, and direct access to the legal entity’s administration, in order to inform them in a timely manner of the plans and measures implemented in the performance of their duties, to provide an account of their actions, and to request the adoption of necessary measures for activities that may be beyond their capacity. The legal entity shall provide those responsible with the necessary material and immaterial resources to adequately perform their tasks, considering the size and economic capacity of the legal entity.
4. Provision of periodic evaluations by independent third parties and updating and improvement procedures based on those evaluations.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

VII Crime Prevention Policy Law 20.393

The following policy establishes the principles and guidelines that the company has determined to be the basis for the adoption, implementation and operation of the Crime Prevention Model.

VII.1 Principles and guidelines of the Crime Prevention Model

1. The company shall maintain an adequate model of organization, administration and supervision for crime prevention, which is called the “Crime Prevention Model” or “CPM”, through which it will promote compliance with Law 20.393.
2. The Board of Directors, management, executives, workers and personnel dependent on the company must comply with the provisions of the CPM. The application, supervision and oversight of the practices established in this model will be the responsibility of the Crime Prevention Officer (CPO)
3. The duration of the role of the Crime Prevention Officer designated by the Board of Directors shall be three years, with the possibility of being extended for periods of the same duration.
4. The Company’s Board of Directors must provide the Crime Prevention Officer with the resources and faculties necessary to perform his/her functions. These include the resources and materials necessary to adequately carry out his/her work, considering the size and economic capacity of the company; as well as direct access to the company’s highest administration to inform them in a timely manner, and through an appropriate medium, of the plans and measures implemented in the performance of his/her duties, and to give periodic reports of his/her activities.
5. The CPM establishes ethical norms that complement those established in the different codes and internal regulations of the company, promoting an environment of transparency and fair competition through the values, principles and norms established by the organization.
6. The CPM, the roles and responsibilities determined within it, and the sanctions established for non-compliance must be disseminated and communicated by the CPO to the entire company and its collaborators (internal and external).
7. The CPM must be regularly reviewed by the CPO and updated in the case of relevant changes in business conditions, the company’s internal or external environment, or the legislation in force that affects it.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

8. The CPM shall be periodically evaluated by an independent third party, as part of an improvement and updating procedure based on those evaluations.

VII.2 Roles and Responsibilities

VII.2.1 Of the Board of Directors

1. Designate and/or revoke the title of CPO, in accordance with the provisions of Law 20.393.
2. Provide the materials, resources and access necessary for the CPO to comply with his/her roles and responsibilities.
3. Approve the Crime Prevention Model.
4. Ensure the correct implementation and effective operation of the CPM.
5. Receive and evaluate the CPO's reports regarding the CPM.
6. Inform the CPO about any observed situation that relates to non-compliance with Law 20.393 and/or matters related to the CPM.

VII.2.2 Responsibilities of the CPO

1. Coordinate committee sessions in which the CPO will present, if they exist, complaints regarding the CPM, any weaknesses identified, as well as suggestions for improving policies, procedures, the risk matrix, the model, or the present Manual, etc., in order to elicit proposals and improvements.
2. Report his/her activities every six months to the Board of Directors, discussing the state of the CPM, the sessions of the Conduct and Ethics Committee, and related topics.
3. Ensure the proper implementation and operation of the CPM in accordance with his/her legal powers and responsibilities and the rules established by the Board of Directors.
4. In case of legislative or regulatory changes affecting it, the CPO shall ensure that the CPM be updated as needed in order to maintain its validity and effectiveness. These modifications must be ratified by the Board of Directors.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

5. Maintain a communication and training policy that ensures that all members of the company and its collaborators understand and comply with the protocols, policies, procedures, directions and guidelines established in the CPM.
6. Establish a whistleblowing channel according to the guidelines approved in the Present Manual.
7. Lead the confidential investigation of infractions that have been reported or detected, building an investigation file which shall be shown to the Board of Directors, who may send the information to the relevant authorities.
8. Protect the confidentiality of informants, investigations and the information collected.
9. Inform the Board of Directors in a timely manner, prior to an official meeting if necessary, of any crime or unacceptable ethical conduct that they ought to be aware of, so that the Board may adopt the necessary measures to handle the situation.
10. The CPO shall monitor the effectiveness of the CPM by means of internal audits focused exclusively on this model and independent of the internal auditing schedule of the company. These audits shall be stipulated in a yearly auditing plan.
11. The CPO shall coordinate Periodic Evaluations of the CPM by independent third parties, which can potentially substitute for the audits stipulated in the point above. This is understood as part of a procedure for updating and improvement based on those evaluations.

VII.2.3 General Management

1. Ensure the availability of the materials and resources approved by the Board of Directors for the CPO to successfully carry out his/her roles and responsibilities.
2. Ensure the correct implementation and the effective operation of the CPM.
3. Inform the CPO of any new risks relevant to the CPM that must be evaluated in the Risk Matrix.
4. Inform the CPO of any situation that has been observed that relates to non-compliance with Law 20.393 and/or matters related to the CPM.

VII.2.4 Management

1. Carry out the prevention and detection measures established in the CPM and in its Risk Matrix.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

2. Provide the CPO with the information necessary to carry out his/her duties in relation to the effective implementation and operation of the CPM.
3. Inform the CPO of any new risks relevant to the CPM that must be evaluated in the Risk Matrix.
4. Inform the CPO of any situation that has been observed relating to non-compliance with Law 20.393 and/or matters related to the CPM.

VIII Crime Prevention Procedures Law 20.393

The following Procedure is an integral part of the CPM, establishing guidelines for the adoption, implementation, administration, supervision and updating of the CPM.

This Procedure, as a system, is structured according to the following activities:

VIII.1 Prevention Activities

These correspond to actions and resources focused on eliminating any incentive to engage in conducts or omissions of conduct that are penalized by the CPM.

The resources associated with prevention activities are the following:

Risk Matrix

In the case of the CPM, the Risk Matrix is an important prevention tool that enables the identification of risk areas for criminal activity, existing oversight measures and the company’s level of exposure.

It is the responsibility of the CPO, together with Management, to compile this matrix and keep it up to date. For the purposes of this Model, an annual review has been established. This review can be brought forward in the event of significant changes to the company’s structure or the legislation in force.

The current Risk Matrix can be found in the CPM’s Content Management System.

Policies, Procedures and Instructions

These correspond to various documents that have been elaborated based on the control improvements set out in the Risk Matrix. These prevention documents are linked to the operational procedures and allow for the creation of controls that, when activated, lead to an investigation by the CPO.

The incorporated documents will be individualized in the CPM’s risk matrix, indicating the crime risks that they mitigate.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

Updating and implementing these documents are responsibilities of the CPO.

The documents identified in the present manual can be found in the CPM's Content Management System.

Training Plan

With the objective of disseminating the CPM and its various components, the CPO will create an annual training plan for the different actors involved in the CPM and its procedures, as well as training new personnel that join the company.

The CPO must ensure:

- Careful oversight of the personnel to be trained. They should participate in the lectures (remote or face-to-face) at least once a year.
- That the training incorporates:
 - An explanation of the crimes specified in Law 20.393 and its complementary legislation, the latter depending on the company's activities and business areas.
 - A brief exposition of the contents of the Crime Prevention Manual, its policies and procedures.
 - The program must include different training options with respect to content, depth and frequency, in accordance with the level of exposure to risk of crimes specified in Law 20.393 being committed.
 - The concept of whistleblower and the importance of reporting infractions.
 - Warning signs and the obligation to report. Examples of situations where there is a risk of crimes being committed.
 - Disciplinary as well as legal consequences (civil, penal, administrative) of non-compliance with the internal and external regulations in the material of Law 20.393. The responsibility of each employee with respect to this material.
- Keep a register of training assistants, which is part of the information to be reported.

The current training plan can be found in the CPM's Content Management System.

Dissemination Plan

Communication actions shall be carried out with regard to the Policy, the Procedure and the CPM itself, when appropriate. Such communication must involve all levels of the organization, including the Board of Directors and Management. Communication can be carried out, by way of example, through:

- Intranet.
- Mass email.
- Bulletins.
- The inclusion of the CPM and associated crimes in the company's induction programs.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

- Other means deemed appropriate by the company.

VIII.2 Detection Activities

These correspond to activities that detect potential warnings from the control systems and procedures, as well as reports received through the whistleblowing channels.

The resources associated with detection activities are as follows:

- Conducting internal audits of compliance with the CPM
- Review of litigations
- Review of whistleblowing reports
- Coordination of whistleblowing reports
- Execution of the whistleblowing procedure

VIII.3 Response Activities

These correspond to the actions subsequent to an investigation, including action plans, disciplinary measures and/or sanctions upon those who do not comply with the CPM.

The resources associated with response activities are as follows:

- Reports to judicial / auditing bodies (if applicable)
- Coordination of disciplinary actions
- Log of cases and sanctions
- Communication of sanctions and improvements

Sanctions

In the case of non-compliance with the aforementioned regulations and controls, and taking into consideration the nature of the report that was made and the facts that underpin it, an investigation may be referred directly to the relevant authorities.

In the event that the persons to whom this CPM applies fail to comply with its provisions and principles, they may be sanctioned. Such sanctions may include verbal reprimand, written reprimand, a fine, the recording of facts for consideration in the future professional development of the offender within **ANTARCTICA21**, the termination of the contract in question, and possibly the reporting of the facts to the respective authorities. All of the above will be considered in relation to the nature and seriousness of the facts and their consequences for **ANTARCTICA21**, its shareholders and the market in general.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

The regulations and controls described in the CPM are of an educational and preventative nature, and under no circumstance will their character be pre-police, investigative or punitive with regard to alleged illicit acts within or outside of **ANTARCTICA21**.

VIII.4 Supervision and Monitoring

The supervision of the CPM has the objective of ensuring the correct implementation and management of each of the components that comprise it.

The CPO, together with the **ANTARCTICA21**'s administration, in compliance with Law 20.393, shall establish methods for the effective application of the Crime Prevention Model and its supervision, in order to detect and correct its flaws, as well as to update it in line with changing circumstances of the respective company.

In compliance with the above, the CPM envisages the following activities:

Monitoring the CPM

Supervisory actions, for which the CPO will have the power to request that support areas provide different types of information. The activities to be carried out include:

- Review supporting documents provided by the support areas.
- Reprocess control activities (on the basis of sampling)
- Verify compliance with the constraints established in the procedures.
- Among others.

For activities that rely on sampling, the CPO must determine and document the criteria of use.

External Audits

El CPO shall coordinate with the External Auditor to carry out an audit plan to review the implementation and execution of the CPM.

The results of that review shall be reported to the CPO. This report may eventually be elevated to the Board of Directors.

Updating the CPM

As a result of supervision and monitoring activities, and considering the outcome of managing infraction reports, the CPO shall at least once a year evaluate the necessity of updating the CPM. For such an update, the CPO should conduct the following:

- Review the new rules to be applied.
- Verify important changes in the company or the market.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

- Follow up on improvements implemented to the control activities.

In accordance with the information obtained from the activities mentioned above, the CPO must update the company’s risk matrix and controls, as well as the corresponding policies and procedures.

Periodic Evaluations of the CPM by third parties

Once the CPM has been implemented and put into practice, it may be monitored by an independent firm as part of a mechanism to improve or update it on the basis of their evaluations.

VIII.5 Control Environment

The control environment is composed of contract clauses, regulations, codes and report procedures created or updated by **ANTARCTICA21** in order to mitigate and detect the commission of crimes stipulated in Law 20.393. Therefore, the CPO must ensure that it is up to date, and also that the responsible parties and relevant actors approve of and understand these documents.

Internal Regulations

In compliance with Article 4 of Law 20.393, the Internal Regulations of **ANTARCTICA21** (understanding that the respective document has been duly formalized by Turismo Antártica XXI S.A.) incorporate the obligations, prohibitions and internal sanctions related to the crimes foreseen in Law 20.393. The CPO must ensure compliance with these regulations and that they are updated as necessary.

The Internal Regulations can be found in the CPM’s Content Management System.

Whistleblowing Procedure

In order to enable workers, collaborators and service providers to report infractions in a secure and reliable manner, the Model incorporates a special whistleblowing procedure.

Its design, implementation and oversight are the responsibility of the CPO.

This procedure guarantees the protection of the confidentiality of the informant, unless government authorities require that he/she be identified. In all cases, the CPO must ensure the safety and peace of mind of the informant.

The procedure, in addition to recording the report, activates the various departments that shall review and investigate it, with the CPO being responsible for following up on the matter.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

VIII.6 Support Areas

The support areas correspond to the various actors identified in the Crime Prevention Procedures or to those responsible for specific activities identified in the Manual. Therefore, it is essential that they are fully aware of the importance of their role in the correct implementation and operation of the Model.

VIII.7 Output: Reports and Whistleblowing

The CPO has the responsibility of reporting the following to the Board of Directors on a yearly basis:

- The state of infraction reports or the lack thereof.
- Actions taken in the performance of his/her duties.
- Results of supervision activities.
- Proposed improvements.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

IX General Ethics Guidelines

The objective of the guidelines for ethics and good practices is the formalization of the norms and principles that internally regulate the business ethics and good practices of **ANTARCTICA21**, which are grounded in the company’s legal nature and its current bylaws that reinforce the legal and regulatory norms in force. They ensure that the company’s members who are governed by this Code of Ethics always observe rules of conduct that enable the adequate resolution of situations that could damage or harm the company, customers, third parties and the market in general.

The application of this code governs the conduct of all the Directors, Executives, Shareholders, Clients, Providers and Employees.

IX.1 Standards of Conduct

All the Directors, Executives, Shareholders, Clients, Providers and Employees of **ANTARCTICA21** must:

- Foster and maintain a transparent environment in the activities they carry out according to their roles and their levels of responsibility.
- Conduct work and administrative relationships on the basis of ethics and integrity.
- Require and incentivize that all Directors, Executives, Shareholders, Clients, Providers and Employees of **ANTARCTICA21** carry out their duties in an honest and honorable way.
- Promote and respect compliance with the relevant laws, norms and regulations.
- Work with dedication, perfection, integrity and rectitude and be consistent with **ANTARCTICA21**’s values and policies.

The company will not tolerate actions that deviate from these legitimate ethical standards, whose non-compliance may cause damage to its shareholders, clients, employees and other people involved, as well as the community at large.

The Directors, Executives and Employees of **ANTARCTICA21**, together with our Providers, are obliged to act in accordance with the provisions of this Code.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

X Whistleblowing Procedure

While all the procedures can be found in detail in the CPM’s Content Management System, given its importance for the correct implementation of the CPM, the Whistleblowing Procedure is summarized here:

1. In order to carry out a report of any of the crimes, infractions or ethical misconducts described in the CPM, whether by a worker, executive, director, provider, contractor or third party, the following whistleblowing channels are available:
 - a) Through the report form available at <https://www.antarctica21.com/crime-prevention-policy/>
 - b) The email account exclusively for the use of the Crime Prevention Officer in receiving and handling such reports: canaldenuncias@antarctica21.com
 - c) Through a personal interview that must be previously requested with the Crime Prevention Officer.

2. The whistleblowing report can be carried out either anonymously or in the name of the informant. In the latter scenario, the report will be entirely confidential and the informant should indicate his/her name, RUT, telephone number and email.

In the case of an anonymous report, the informant must attach information and evidence that backs up the claim, without which the report will not be considered.

The fundamentals expected for each report are:

- a) The type of infraction reported; a description of the facts; the locations and dates referred to; the names and positions of those involved.
- b) A narrative of the facts that constitute the crime and details about how it developed or is developing.
- c) Documents that substantiate the report, if they exist.
- d) The identification of people who have witnessed the situation, where applicable.

The CPO shall contact the informant if he/she has provided a contact channel in order to confirm the receipt of the report and the actions that will be carried out, reiterating a commitment to the confidentiality of the information.

3. The reports received by the CPO shall be analyzed in a way that safeguards the confidentiality of the informant and the accused, unless the investigation and the actions that result from it require the divulgation of certain information. In a case where a report implicates the CPO’s involvement, this should be communicated to the Company’s Board of Directors so that they may designate a different person or institution to carry out the investigation.

Code: CPM-01	Effective date: 06-08-2024	Version: 4	Date of issue: 06-08-2024
------------------------	--------------------------------------	----------------------	-------------------------------------

4. The CPO is authorized to contract any services to support the investigation which he/she deems pertinent.
5. During the investigation, the CPO shall respect the presumption of innocence of the individual who has been reported.
6. The results of the investigation shall be presented to the company's board of directors.
7. The CPO shall inform the informant, if they have provided a contact channel, of the results of the investigation and the actions carried out. In cases where it is deemed pertinent, and provided confirmation by the Board of Directors, the CPO can disseminate the results of the investigation at the level of the company, always safeguarding information about the informant.