CRIME PREVENTION MODEL – COSAYACH

BOARD OF DIRECTORS

COMPLIANCE OFFICER

- THE COMPANY
- OTHER AFFILIATED COMPANIES

LOCAL REGULATIONS

- LAW N° 20,393
- LAW N° 21,595

INTERNATIONAL REGULATIONS

- FCPA
- UK BRIBERY

CORPORATE CRIME PREVENTION MANUAL

REVIEW AND CONTINUOUS IMPROVEMENT

Activities

- Employee Training Programs
- Clause in Contracts
- Risk Assessment Matrix
- Audit and Monitoring
- Whistleblower Channel
- Regulatory Reporting
- Reports to the Board of Directors

High-Risk Processes

- Government Relations
- Operations with Affiliated Companies
- Third-Party Relationship Management (Including Suppliers, Customers, and Representatives)
- Practices Specific to the Economic/Industrial Sector

Internal Regulations

- Code of Conduct and Ethics
- Regulations on Order, Hygiene, and Safety (RIOHS)
- Policies, Procedures, and Manuals

Support areas

- Controllership Department
- Legal Department and/or Legal Advisors
- Remuneration and/or HR Department
- Internal Audit Department

EXTERNAL AUDIT OF THE CRIME PREVENTION MODEL (MPD)