

**Crime Prevention Manual –
Law No. 20393
(Suppliers' Version)**

Techint Chile S.A.

November 2019

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1. INTRODUCTION

Law No. 20393 was published on December 2, 2009. This Law was amended by Law No. 21132, which establishes the criminal liability of legal persons for crimes such as money laundering (Article 27, Law No. 19913), terrorist financing (Article 8, Law No. 18314), bribery of national public employees and foreign public officials (Articles 250 and 251 *bis*, Criminal Code), receipt of stolen property (Article 456 *bis* A, Criminal Code), incompatible negotiation (Article 240, Criminal Code), commercial bribery (Articles 287 *bis* and 287 *ter*, Criminal Code), misappropriation (Article 470, item 1, Criminal Code), unfair administration (Article 470, item 11, Criminal Code) and water pollution (Article 136, General Law on Fisheries), among other. According to this law, the companies are criminally liable for the abovementioned crimes, which are committed by the owners or collaborators, both internal and external, when the commission of the offence may be the consequence of non-compliance, by the legal person, with the functions of direction and supervision.

Such law establishes that the direction and supervision duties would be considered satisfied when, prior to commission of the crime, an organization, management/administration and supervision model or “Crime Prevention Model” had been implemented, pursuant to the provisions stated in such law. The intention of the law is to make the legal person develop an organizational ethics culture and the control of such structure to effectively prevent any bad practices and any possible criminal consequences.

Law No. 20393 is applicable to all legal persons under private law and to State-owned companies, and it may be compared to the provisions of paragraph 2 of Article 58 of the Code of Criminal Procedures, which states that the criminal action may only be effectively brought against natural persons, since the parties who had taken part in the punishable act must respond to the legal persons, without prejudice to the civil liability corresponding to the latter. By virtue of the foregoing, Law No. 20393 expressly states that the provisions of paragraph 2 of Article 58 of the Code of Criminal Procedures are not applicable.

It is important to mention that the criminal liability of the natural person committing the improper act will be individually pursued by the Public Prosecutor’s Office (*Ministerio Público*) and the Courts of Justice, according to general rules.

In furtherance of Law No. 20393 and the duty of direction and supervision by Techint Chile S.A. (hereinafter also referred to as the “Company” or “Techint”), a Crime Prevention Model has been approved and implemented, hereinafter also referred to as the “Prevention Model” or the “Model”, the elements of which are described in this “Crime Prevention Manual, Law No. 20393”, hereinafter also referred to as the “Prevention Manual” or the “Manual”.

This version of the Manual has been adapted from its original version so that it may be applied to (or adopted by) all Suppliers of Techint Chile S.A. A Supplier shall be any company, natural person or legal person (both national and foreign) that provides any type of work or service, or supplies goods of any kind, to the Company, also comprising the Supplier’s administrators, directors, executives, workers and collaborators.

2. LEGAL FRAMEWORK

Law No. 20393, as amended, has established a restricted catalog of crimes that, if committed by the owners, the main executives of Techint, or any persons reporting to them, may create criminal liability for the Company. According to Chilean laws, these crimes are the ones depicted below. It is important to point out that no in-depth analysis has been made of the crimes involving violation of a fishing ban (Article 139, General Law on Fisheries), illegal fishing of resources from the bottom of the sea (Article 139, General Law on Fisheries) and processing and storage of scarce products (Article 139 *ter*, General Law on Fisheries), since these activities are rather unrelated to the business conducted by Techint and its related parties.

2.1 Money Laundering

The money laundering crime is stated in Article 27 of Law No. 19913, and requires a predicate crime to be the origin of the funds to be laundered. This offence consists in concealing or disguising the unlawful origin of the property, since this property is the result of a previous crime, or in maintaining the possession of such property of unlawful origin (for example to use it).

2.2 Terrorist Financing

As stated in item 1 of Article 2 of the UN International Convention for the Suppression of the Financing of Terrorism of 1999: *“Any person commits an offence within the meaning of this Convention if that person by any means, directly or indirectly, unlawfully and willfully provides or collects funds with the intention that they should be used or in the knowledge that they are to be used, in full or in part, in order to carry out: (a) an act which constitutes an offence within the scope of and as defined in one of the treaties listed in the annex; or (b) any other act intended to cause death or serious bodily injury to a civilian, or to any other person not taking an active part in the hostilities in a situation of armed conflict, when the purpose of such act, by its nature or context, is to intimidate a population, or to compel a government or an international organization to do or to abstain from doing any act”.*

In Chilean laws, the crime of terrorist financing is specified in Article 8 of Law No. 18314.

2.3 Bribery

The act of bribery of national public employees or foreign public officials is criminalized in Articles 250 and 251 *bis* of the Criminal Code, respectively.

The crime of bribery is the conduct, either active or passive, of a public employee, aimed at receiving an improper benefit because of his/her position, as well as the conduct of a party, either active or passive, aimed at giving to a public employee or official an improper benefit because of his/her position.

In general, the passive or active bribery is an improper or illegal benefit, either economic or of any other nature, for a public official or a third party, in exchange for performing an act or refraining from acting. It is stated that the actual consideration of the public official is not required for the crime to be verified; in fact, this crime is verified upon the request, acceptance or delivery of any type of benefit to which the public official is not entitled, with no need of an action or omission by the public official as consideration for the benefit requested, desired or received.

This offence also applies to foreign public officials who receive or consent to receive an improper advantage in the sphere of any economic activity performed abroad.

2.4 Receipt of Stolen Property

The receipt of stolen property is criminalized in Article 456 *bis* A of the Criminal Code, and is related to the conduct deployed by the owners, controllers, executives, responsible parties, workers or employees of the legal person or of the Supplier, in order to hold, transport, purchase, sell, transform or market any goods that have been the object of theft –taking or appropriating goods without using the force– or robbery –taking or appropriating goods using the force or exerting violence on people–, if the owner, executive or employee of the legal person knows, or should know, the illegal origin of such goods.

2.5 Incompatible Negotiation

This crime is contemplated in Article 240 of the Criminal Code and establishes that the Supplier may not take any personal interest, either directly or indirectly, in any negotiation, action or contract where it would intervene because of its position as liquidator, director, manager, guardian, etc. in relation to the management of another person's property.

2.6 Unfair Administration

The offence of unfair administration is contemplated in Article 470, item 11, of the Criminal Code, which establishes that the Supplier that is in charge of safeguarding or managing another person's property may not cause any damage by abusively exercising its power to act on such person's behalf or to bind such person, or by performing or omitting to perform any other action overtly contrary to the interest of the holder of the relevant property.

2.7 Commercial Bribery

This offence is stated in Articles 287 *bis* and 287 *ter* of the Criminal Code, and in such respect, it is strictly forbidden for the Supplier, under any circumstances, and regardless of any instruction to the contrary it may have received, to request or agree to receive an economic benefit or another advantage, for itself or for a third party, to favor, or for having favored, a certain bidder over another bidder while performing its duties in the execution of a contract. Likewise, it is strictly forbidden for the Supplier to offer or consent to the act of giving an employee or agent an economic benefit or another advantage, for itself or for a third party, to favor or for having favored, the contracting of one bidder over another bidder.

2.8 Misappropriation

This offence is criminalized under Article 470, item 1, of the Criminal Code, and in such respect, it is strictly forbidden for the Supplier to take or divert entrusted money, objects or any other personal property it may have received in escrow, commission or administration, or under any other title resulting in the obligation to deliver or return such property.

2.9 Water Pollution

This crime is contemplated in Article 136 of the General Law on Fisheries, and in such respect, it is forbidden for the Supplier to dump or cause to dump, into the sea, rivers, lakes or any other body of water, chemical, biological or physical pollutants that may damage the hydrological resources, if they have not been previously neutralized to prevent such damage.

3. CRIME PREVENTION MODEL

Techint Chile S.A.'s Crime Prevention Model consists in a set of processes, procedures, manuals, protocols, regulations, resources, organizational structure, roles, sanctions and responsibilities, among other, for preventing the commission of the crimes stated in Law No. 20393, as amended, which are described in this Manual.

In addition, the Model contains a risk diagnosis and the determination of controls, monitoring mechanisms and reports, appropriate for the prevention, detection and mitigation of any risk related to the commission of crimes such as bribery, money laundering, terrorist financing, receipt of stolen property, incompatible negotiation, unfair administration, commercial bribery, misappropriation, and water pollution.

As a result, shareholders, directors, managers, executives and other collaborators, as well as their Suppliers, are required to comply with the laws and regulations in force, while the commission of any illicit act is expressly forbidden to them, especially in the event that it may result in criminal liability for Techint Chile S.A.

Consequently, Techint Chile S.A.:

1. Has adopted and implemented an organizational, management and supervision model, called Crime Prevention Model (Article 3, Law No. 20393), in order to ensure the fulfillment of its management and supervision duties.
2. Has appointed a Prevention Supervisor, who shall count on the resources and powers required to ensure the adequate performance of his/her role, as described in Section 4 of this Manual (Article 4, items 1 and 2, Law No. 20393).
3. Has implemented protocols, regulations and procedures which are described in the following Sections of this Manual (Article 4, item 3, Law No. 20393) in order to prevent the commission of the crimes foreseen in Law No. 20393.
4. Has established obligations, prohibitions and internal administrative sanctions for the people who fail to comply with the prevention regulatory framework that was implemented (Article 4, item 3, Law No. 20393).
5. Has established and designed methods for the effective application of the Crime Prevention Model and its supervision, for the purpose of detecting and correcting any failures, and also for updating the Model as circumstances may change, counting on the permanent certification by means of companies accredited to such effect by the Superintendency of Securities and Insurance (SVS) (Article 4, item 4, Law No. 20393).

4. PREVENTION SUPERVISOR

4.1 Appointment of the Prevention Supervisor

The Board of Directors of Techint Chile S.A., as the chief management authority of the Company, characterized as the "Legal Entity's Management" by Law No. 20393, has appointed a Prevention Supervisor, with a term of office of three years, and shall provide this Supervisor with all the resources and powers required for the performance of his/her function.

To comply with his/her duties, the Prevention Supervisor is independent from Techint Chile S.A.'s Management.

4.2 Responsibilities of the Prevention Supervisor

The functions and responsibilities of the Prevention Supervisor are:

1. Together with Techint Chile S.A.'s Board of Directors, the Prevention Supervisor shall safeguard the adequate development, implementation and operation of the Model, promoting the design of specific and appropriate protocols and procedures to prevent and control the risks.
2. To make a diagnosis of the risks related to the crimes stated in Law No. 20393 that may be present in Techint S.A. and keep such diagnosis properly updated.
3. To make the Model available to the organization at large and to train the Company's personnel on the scope of his/her duties as Prevention Supervisor and on the protocols and procedures in place, and also train them on the obligations and prohibitions they are subject to, in relation with the Prevention Model, pursuant to Law No. 20393.
4. To safeguard the correct implementation, operation, review, maintenance and improvement of the Crime Prevention Model.
5. To check that the Company's internal processes and activities have effective controls for the prevention of crime-related risks and to keep a record of evidence proving the execution of these controls and the compliance with them.
6. To lead the investigation process and the analysis of the reports on the eventual commission of crimes or failures to comply with the regulations of the Crime Prevention Model.
7. To document and safeguard any evidence related to preventive activities in the commission of crimes.
8. To report to Techint Chile S.A.'s Board of Directors, at least every six months, the result of his/her management as Prevention Supervisor, as well as the operation of the Model and any related matters falling under his/her jurisdiction. In addition, the Supervisor shall timely notify the Board of Directors about any event that the Board should be aware of and that could be characterized as a crime, so that the Directors may adopt the most appropriate measures.

5. RISK DIAGNOSIS

The Prevention Supervisor is in charge of identifying, analyzing and assessing the risks inherent in the commission of the crimes stated in Law No. 20393, as amended. These risks must be included in a Risk Assessment Matrix and the latter shall be reviewed on an annual basis or whenever there are relevant changes in the conditions of the business.

The diagnosis of the risks related to the crimes stated in Law No. 20393, as amended, involves an identification of the risks, which requires the participation of managers or top executives from the different areas of the Company, with whom the Prevention Supervisor must prepare and/or update the record of activities or processes where there may be a risk involving the commission of crimes such as money laundering, terrorist financing, bribery of national public employees or foreign public officials, receipt of stolen property, incompatible negotiation, unfair administration, commercial bribery, misappropriation, and water pollution.

Risk identification seeks to answer this question: What can happen, where and when? The purpose is to identify the sources of risk and the events that may have a negative effect on the Company and, therefore, end up in criminal liability.

The identification of activities and processes involving the creation or increase of any risk related to money laundering, terrorist financing, bribery and remaining crimes that may result in criminal liability for the Company gives rise to a Risk Assessment Matrix, under Law No. 20393, as amended, the control and follow-up of which is in the hands of the

Prevention Supervisor.

Upon identification of the risks, they must be analyzed under a process seeking to understand each risk, provide information to make a decision about whether the risks should be treated or not, and then evaluate the most adequate and effective strategies for treatment in terms of cost.

Risk analysis entails the consideration of the risk sources, the likelihood that a risk event may occur and the consequences that such occurrence would have for the organization. The likelihood and the consequences, or impact, are combined so as to indicate the risk level or its severity.

6. PREVENTIVE MEASURES

6.1 Identification of Controls

After the identification of Techint Chile's activities and processes that are exposed to the risk of crimes related to money laundering, terrorist financing, bribery of national public employees or foreign public officials, receipt of stolen property, incompatible negotiation, unfair administration, commercial bribery, misappropriation, and water pollution, the corresponding preventive measures were established to face these crimes.

Techint has established preventive controls for each one of the risks detected, which are described in the Risk Assessment Matrix mentioned in Section 5 above. In addition, such Matrix indicates the areas that participate in the control activities. The Risk Assessment Matrix is included in the Crime Prevention Manual, under Law No. 20393, which is made available to the Supplier via Techint web page or delivered in printed copy for free at the reception desk of all Techint HQs.

Controls were identified with the cooperation of representatives from all areas and functions of the Company, including the prevention supervisor, and the result was a description of each one of the controls identified and the evidence of their existence.

Beyond the specific controls established for each one of the risks included in the Risk Assessment Matrix, in the case of the prevention of bribery, the following policies shall also be observed in terms of the relationship with public employees or officials and with Suppliers. These measures shall be adopted by all Suppliers, regardless of the fact that they may have similar standards in their Prevention Models.

6.1.1. Policy on Meetings with Public Employees or Officials

At the meetings held with public employees or officials, the following protocol shall be followed:

1. Face-to-face meetings to be held with any public employee or official shall be included in an agenda of Techint's respective collaborator, which shall be kept specifically for this purpose. Hierarchical superiors shall permanently supervise compliance with this obligation.
2. At least two representatives from Techint shall attend meetings with public employees or officials unless, by way of a duly justified exception, this turned out to be impossible.
3. Techint's employee who is responsible for the meeting shall prepare a minute of such meeting, which shall be filed and made available to the Quality and Audit Management Direction and to the prevention supervisor for review at any time.
4. Whenever a public employee or official visits Techint's offices or work areas for the purpose of checking compliance with any legal regulation, the Company's employee who receives such person must complete a minute created to such effect, which must be duly recorded and filed so that it may be reviewed at any time by the Quality and Audit Management Direction or the prevention supervisor. The minute shall be signed by the Techint's

employee(s) who received and/or interacted with the supervising public official.

5. Communications with public employees or officials by means of emails shall exclusively be addressed to institutional email addresses, in relation with both Techint and the institution to which the public employee or official belongs.

6.1.2. Relationship with the Suppliers

For the relationship with its Suppliers, Techint has a series of procedures in place which regulate the method applicable to the purchasing process, whether it is a direct purchase (in the event that it is not possible or convenient to apply a competitive process among several Suppliers as is the case when there is one single source or an appointed Supplier or when the purchase is urgent) or a purchase in which several proposals or price quotations are requested.

The “Procurement” function includes several stages, from the time the need for any product purchase arises to the time when the selected Supplier accepts the corresponding “Purchase Request” or “Purchase Order”.

In order to request a purchase, the “Requesting Function” shall require the purchase or contracting of products or services by means of a duly authorized “Purchase Requisition”, which will include the documents containing a quantitative and qualitative description of the request.

The authorization levels for purchase requisitions are defined in the “Purchase Authorization Matrix”.

The “Product Purchase” function is exclusively performed by the procurement person-in-charge of the Procurement Management Office, or of the Project or Contract Maintenance Management Offices, and becomes effective when the selected Supplier receives a “Purchase Request” or “Purchase Order”, as well as the “Contracting General Conditions” and the remaining attached documents as appropriate.

The Supplier or Suppliers who receive a request for quotation shall be included in the “Suppliers Master Data” and the procedures established in the corresponding circular letter shall apply to the request, receipt and opening of their offers.

To be part of the “Suppliers Master Data”, Suppliers shall be subject to an assessment and qualification process according to the provisions detailed in the procedure “Assessment of Suppliers”, Code WI-PRO-201 R02.

After selecting the bidder on the basis of independent technical and economic assessments, a notification is sent to the bidder stating that its offer has been accepted. Then, a “Purchase Request” or “Purchase Order” is sent to the bidder, which must be previously authorized, and then signed by the qualified representative and sent back to Techint for registration.

Based on the technical analysis of the “Requesting” Function and the economic/financial analysis of the “Procurement” Function, the latter prepares the “Awarding Proposal”.

The approval levels of the Awarding Proposal are defined in the “Purchase Authorization Matrix”.

The next step consists in the issue of the “Purchase Request” or “Purchase Order” of goods and services.

All collaborators and Suppliers of Techint Chile S.A. shall strictly follow the purchase regulations and procedures described in the abovementioned documents.

7. OBLIGATIONS, PROHIBITIONS AND SANCTIONS

The following obligations, prohibitions and sanctions established for all employees and collaborators of Techint Chile S.A. shall also be adopted by the Suppliers, regardless of the fact that they may have established in their rules or regulations similar obligations, prohibitions and sanctions that may serve to prevent and punish the commission of crimes related to money laundering, terrorist financing, bribery of national public employees or foreign public officials, receipt of stolen property, incompatible negotiation, unfair administration, commercial bribery, misappropriation, and water pollution.

7.1 Prohibitions

It is forbidden for the Supplier to engage in any conduct contrary to Techint's Crime Prevention Model, and also to make any operation that involves or may involve a criminal liability for the Company. In this respect, it is absolutely forbidden for the Supplier to engage in any of the conducts described below, namely:

- 7.1.1 **Money Laundering:** This includes the conducts described in Article 27, Law No. 19913. Consequently, it is forbidden for the Supplier to perform actions tending to conceal or disguise the illicit origin of money or other type of assets, although knowing that they are, either directly or indirectly, the proceeds of criminal acts described in Law No. 19913 (illicit traffic in narcotic drugs and psychotropic substances, terrorist acts, illicit manufacturing or trafficking in firearms, namely, some crimes stated in the General Banking Law and the Law on the Securities Markets, breach of public duty [prevarication], bribery, kidnapping, some sex crimes, child prostitution, trafficking in migrants and humans for sexual exploitation, among other).
- 7.1.2 **Terrorist Financing:** It is forbidden for the Supplier to request, collect or provide funds to be used for the commission of terrorist crimes, according to the provisions of Article 8, Law No. 18314.
- 7.1.3 **Bribery of National Public Employees and Foreign Public Officials:** As criminalized by Article 250 and Article 250 *bis* of the Criminal Code, it is strictly forbidden for the Supplier, under any circumstances, and regardless of any instructions to the contrary, to give, offer or consent to give to any national public employee, an economic benefit or another advantage, to his/her benefit or that of a third person, because of the position held by the employee, for performing an act, or for having performed an act, related to his/her position, or for refraining from acting in relation with his/her position or committing crimes in the performance of the duties inherent in his/her position.
- Likewise, by virtue of the provisions stated in Article 251 *bis* of the Criminal Code, it is also strictly forbidden for the Supplier, regardless of any instructions to the contrary, to receive, offer, promise or give a foreign public official an economic benefit or another advantage, to his/her benefit or that of a third person, for performing an act or for refraining from acting in order to obtain or retain for himself/herself or a third party, any undue business or advantage in the field of any economic activity performed abroad.
- 7.1.4 **Receipt of Stolen Property:** It is forbidden for the Supplier to engage in any of the conducts described in Article 456 *bis* A of the Criminal Code, i.e., to hold, transport, purchase, sell, transform or market, in any form whatsoever, stolen things even though knowing, or having to know, their origin.
- 7.1.5 **Incompatible Negotiation:** It is forbidden for the Supplier to take any personal interest, either directly or indirectly, in any negotiation, action or contract where it would intervene because of its position as liquidator, director, manager, guardian, etc., in relation with the management of another person's property, pursuant to the provisions of Article 240 of the Criminal Code.
- 7.1.6 **Unfair Administration:** The Supplier that is in charge of safeguarding or managing another person's property shall not cause any damage by abusively exercising its power to act on such person's behalf or to bind such person, or by performing or omitting to perform any other action overtly contrary to the interest of the holder of the property, according to Article 470, item 11, of the Criminal Code.
- 7.1.7 **Commercial Bribery:** Pursuant to Articles 287 *bis* and 287 *ter* of the Criminal Code, it is strictly forbidden for the Supplier, under any circumstances, and regardless of any instruction to the contrary, to request or agree to receive an economic benefit or another advantage, for itself or for a third party, to favor, or for having favored, a certain bidder over another bidder while performing its duties in the execution of a contract. Likewise, it is strictly forbidden for the Supplier to offer or consent to the act of giving an employee or agent an economic benefit or another advantage, for itself or for a third party, to favor or for having favored, the contracting of one bidder over another bidder.

7.1.8 **Misappropriation:** It is strictly forbidden for the Supplier to commit the offense of appropriation of entrusted property or diversion of entrusted money, objects or any other personal property received in escrow, commission or administration, or under any other title resulting in the obligation to deliver or return such property, pursuant to the provisions of Article 470, item 1, of the Criminal Code.

7.1.9 **Water Pollution:** According to Article 136 of the General Law on Fisheries, it is forbidden for the Supplier to dump or cause to dump, into the sea, rivers, lakes or any other body of water, chemical, biological or physical pollutants that may damage the hydrological resources, if they have not been previously neutralized to prevent such damage.

Likewise, it is forbidden for the Supplier to engage in any other conduct considered to be a crime under Law No. 20393, and its current or future amendments.

The Supplier states that it has not previously engaged in any of these forbidden conducts and operations.

7.2 Obligations

7.2.1 The Supplier undertakes to comply in full with all the regulations applicable to the contract it has entered into with the Company and/or that regulate the work, service, product or equipment to be delivered or any other service to be rendered to Techint regardless of the nature of such regulations.

7.2.2 The Supplier undertakes to manage and supervise its workers and any other personnel contracted to deliver the goods or render the services which are the purpose of the contract; workers shall always act under a strict subordination to, and labor dependence on, the Supplier. As a result, the Supplier undertakes to provide workers with the necessary instructions to such effect, at its own expense and risk, without any interference by, or responsibility for, Techint. The abovementioned also applies to third parties contracted or subcontracted by the Supplier, who shall also act at the Supplier's own expense and risk, without any responsibility for Techint.

7.2.3 The Supplier undertakes to adopt and implement in full its own Crime Prevention Model, according to Law No. 20393, or otherwise adopt efficient and effective internal controls to prevent, avoid and detect crimes related to money laundering, terrorist financing, bribery and receipt of stolen property by its owners, top executives, representatives or whoever performs management and supervision activities or those who are under the direct management or supervision of any of the persons mentioned above.

7.2.4 The Supplier undertakes to adopt all the necessary measures to prevent any conduct contrary to Techint's Crime Prevention Model and any other event inherent in the commission of crimes such as money laundering, terrorist financing, bribery of national public employees or foreign public officials, receipt of stolen property, incompatible negotiation, unfair administration, commercial bribery, misappropriation and water pollution. Likewise, the Supplier undertakes to adopt all the measures required to ensure that its workers or dependents, and its subcontractors, do not engage in any forbidden operation that involves or may involve Techint's criminal liability according to Law No. 20393, as amended.

7.2.5 The Supplier undertakes to notify via the report mechanism foreseen in Techint's Crime Prevention Model (Compliance Line 1-230-020-1814 or a report via the form available at <https://www.techint.com/en/about-us/ethics-and-compliance>) any violation of the laws, the contract executed or the Crime Preventive Model, and any forbidden conduct or operation involving the crimes included in Law No. 20393, as amended. The Supplier also undertakes to immediately adopt all the measures required to verify and clarify the events and prevent any consequential damage to Techint's property or image, in the event that one of the Supplier's workers engages in such conducts.

7.2.6 The Supplier undertakes to cooperate in good faith upon any request made by Techint in relation with an investigation being performed by Techint as soon as the Company becomes aware of, or receives any evidence about, infringements to the regulations of the Crime Prevention Model or the eventual commission of crimes under Law No. 20393.

7.3 Sanctions

If the Supplier engages in any of the conducts described as crimes in Law No. 20393, as amended, or if there is any inaccuracy or misrepresentation in its statements, or if the Supplier fails to comply, or disregards, any conduct it is bound to according to these statements, there will be a substantial breach of the obligations stated in the Supplier's Contract or Purchase Order and, consequently, Techint Chile S.A. shall be authorized and entitled to immediately terminate the contract or purchase order executed with the Supplier without any right to compensation for the Supplier and regardless of Techint's right to demand compensation for damages to the Supplier.

8. TECHINT ENGINEERING AND CONSTRUCTION'S CODE OF CONDUCT

Techint has a Code of Conduct specifically designed for Suppliers, called "Code of Conduct for Suppliers", which defines the guidelines and standards of corporate integrity. It contains the ethical principles that are the foundations of the relationship between Techint and its Suppliers and establishes the integrity and transparency standards applicable to Techint and its collaborators. The Corporate Audit Management Direction, in coordination with the top level management of the organization, shall be in charge of solving any matter related to the interpretation and operational instrumentation that cannot be satisfactorily resolved by the regular hierarchical supervision levels. This document applies to Suppliers in terms of their relationship with Techint and shall be signed and downloaded from the following link: <https://www.techint.com/en/about-us/ethics-and-compliance>

Even though the Code of Conduct for Suppliers does not have specific provisions for the prevention of the crimes under Law No. 20393, as amended, it establishes a business conduct compliance context applicable to all circumstances.

9. INTERNAL REGULATIONS ON ORDER, HYGIENE AND SAFETY

According to subitem d), item 3, Article 4, Law No. 20393, the legal persons shall include, in their regulations, the internal obligations, prohibitions and administrative sanctions to be defined as part of the Prevention Model.

In order to comply with the abovementioned provision, the obligations and prohibitions to be included in Techint's Internal Regulations on Order, Hygiene and Safety of Techint, hereinafter "Internal Regulations", have been defined. Even though this instrument applies to Techint's workers, the Suppliers visiting Techint's facilities, both at HQs and in the field, or who are in contact with Techint's personnel, shall observe the standards included in the Internal Regulations, especially in terms of safety standards, prohibitions and obligations related to Law No. 20393, as amended. The Internal Regulations are available for Suppliers at Techint Chile S.A. web page.

9.1 Contracts with Suppliers

According to the second paragraph of subitem d), item 3, Article 4, Law No. 20393, the obligations, prohibitions and sanctions to be established as part of the Prevention Model shall be expressly included in the contracts with Service Providers and, in this sense, any reference made to these Regulations in contracts or purchase orders with Suppliers shall be considered sufficient to comply with this requirement.

To comply with this provision, Techint has included in the contract, "Purchase Request" or "Purchase Order" to be entered into with all its Suppliers, except for those related to adhesion contracts, clauses making reference to this Manual as well as the provisions of Law No. 20393.

10. PROCEDURE AND CHANNEL FOR REPORTING

10.1 Compliance Line

In agreement with its integrity and transparency standards and as mentioned in Chapter 4 of the Code of Conduct, Techint has made available an ethics line for personnel, suppliers, investors and third parties in general. This line consists in a confidential communication channel called Compliance Line, which allows for receiving reports on potentially irregular events that may threaten the Company's property or its standards.

This channel allows for reporting potentially irregular events including, without limitation, reports related to accounting, auditing or internal control matters as well as infringements or irregularities, among other.

Techint's employees and suppliers are required to report, via this Compliance Line and as soon as they become aware of the event, any infringement to the regulations defined in this Manual, as well as any action that they believe may eventually lead to one of the crimes stated in Law No. 20393 (money laundering, terrorist financing and bribery, among other).

The report shall provide sufficient information to allow for an effective investigation of the event. Although it is important to give the possibility of maintaining anonymity (the Compliance Line offers this possibility), it is always useful to provide contact information, such as telephone number or email address, so as to be able to make questions that may be critical to find the origin of the event.

The Compliance Line allows to send a report via a form available at <https://www.techint.com/en/about-us/ethics-and-compliance> or via the telephone number 1-230-020-1814, available 24/7 in Chile, at no cost for the person reporting the event.

10.2 Investigation of Reports

The Audit Management Direction, under the direct supervision of Techint's Presidency, shall receive and analyze the reports channeled through the Compliance Line, keeping the anonymity of the reporting person and considering all the information provided as strictly confidential, to the extent allowed by the applicable laws.

When the events reported are related to any non-compliance with the regulations of this Manual or to potential crimes foreseen in Law No. 209393, committed by collaborators or Suppliers of Techint Chile S.A., the Audit Management Direction shall provide the information about the event and then the result of the investigation (once completed) to the Prevention Supervisor of Techint Chile S.A..

10.3 Reports Brought to the Courts of Justice

If an event may be characterized as a crime, the Prevention Supervisor shall analyze, together with the attorney and the Management Board of Techint Chile S.A., the possibility of filing a report before the Prosecutors' Office [*Ministerio Público*] or the Courts of Justice.

11. SUPERVISION OF THE CRIME PREVENTION MODEL

The purpose of this process, falling under the responsibility of the Prevention Supervisor, is to check the effective application of the Crime Prevention Model and its supervision in order to detect and correct its failures, as well as to update it whenever required by the circumstances.

The Supplier shall actively cooperate with the investigation process or audit to be performed by Techint's Prevention Supervisor, providing all the information and documentation that may be required to the Supplier for the correct

performance of the supervision task. Likewise, the Supplier shall perform internal audits in order to ensure and supervise compliance with the standards of Law No. 20393.