



Corporate Manual of Crime Prevention

(Law 20,393)

Antarctica21

Fly & Sail Expeditions

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Release History - Control of Changes

The following chart lists the updates made to the Corporate Manual of Crime Prevention of the companies **Turismo Antártica XXI S.A.** Tax ID 99.523-260-K and Novantar S.A. Tax ID 76.202.774-7, from now on both grouped also and indistinctly as "**GRUPO ANTARCTICA 21**" or the "company", identifying the current version, its date and author.

Document

Document Title	Corporate Manual of Crime Prevention
Responsible for the Document	Ninoska Águila
Email	naguila@antarctica21.com

Document Approval

	Name	Position	Signature
Drafted	Marcelo Kirsinger	Consulting Associate - Baker Tilly Chile	
Reviewed	Ninoska Águila	Crime Prevention Officer	
Approved			

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Confidentiality note:

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II Introduction

Current Regulations

On December 2, 2009, Law No. 20,393 was published in the Official Gazette, which "Establishes the criminal liability of legal entities in the crimes of money laundering, financing of terrorism and bribery crimes it indicates". Additionally, Law 20,931 known as the "short anti-crime agenda" law, which was published in 2016, amended Law 20,393 by incorporating the crime of receiving (handling stolen goods).

Subsequently, in 2018, **Law 21,121** incorporated the crimes of:

- Incompatible negotiation
- Corruption among individuals
- Misappropriation
- Disloyal administration

In addition, **Law 21,121** incorporated other modifications, of which we highlight the following:

- Increase in penalties
- Creates a penalty of ineligibility of natural persons
- Widens the concept of Bribery
- Recognition of corporate gifts
- Effective Cooperation relief
- Aggravating circumstance in case of acting as a group destined to commit these illicit acts
- Alteration of the rule on the prescription of the criminal action
- Expand base crime of Money Laundering

In 2019 **Law 21,132** incorporated the crimes of

- Introduction of contaminating agents
- Use of forbidden hydrobiological resources
- Misappropriation of benthic resources
- Reception of hydrobiological resources

Finally, in 2020, **Law 21,240** incorporated the crimes of:

- Promoting the risk of propagation in times of pandemic, epidemic or contagion
- Order a worker in quarantine or compulsory sanitary isolation to attend the workplace.

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Law 20,393, states that the duties of direction and supervision will be considered fulfilled when, prior to the commission of the crime, the legal entity has adopted and implemented models of organization, administration and supervision to prevent crimes such as the one committed, in which case a legal excuse operates.

In response to this scenario, the companies **Turismo Antártica XXI S.A.** Tax ID 99.523-260-K and **Novantar S.A.** Tax ID 76.202. 774-7, hereinafter both grouped also and indistinctly as "GRUPO ANTARCTICA 21" or the "company", acting in good faith and committed to the legal system in force, has adopted and implemented a model of organization, administration and supervision suitable to prevent and sanction, effectively, the commission of the referred crimes, hereinafter also **Corporate Crime Prevention Model**, or **MPD** (for its Spanish Acronym).

III Objective of the Manual

The objective of this Manual is to establish the guidelines for the operation of the Corporate Crime Prevention Model, MPD, and the procedures that allow its implementation and operation; including a description of the activities that intervene in its operation to comply strictly with the laws, rules, regulations and other relevant regulations to prevent illegal operations related to Law 20,393 on Criminal Liability of Legal Entities.

IV Scope

The guidelines established in this Crime Prevention Model will be applied to each and every one of the members of **GRUPO ANTARCTICA 21**, including its Directors, General Manager, Managers, Assistant Managers, Department Heads, Professionals, Administrative staff, suppliers, and service providers.

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V Definitions

The following definitions allow us to understand the main concepts that are part of this Manual:

CRIME: Typical conduct, action or omission described by the law, which is illegal (contrary to law) and guilty, to which corresponds a sanction called penalty, with objective conditions of punishability.

ASSET LAUNDERING: According to Article 27 of Law No. 19,913, it is considered as such, "Any act tending to hide or conceal the illicit origin of certain assets, knowing that they come from the perpetration of crimes related to illicit drug trafficking, terrorism, arms trafficking, promotion of child prostitution, kidnapping, bribery, and others".

FINANCING OF TERRORISM: Based on the provisions of Article 8, Law No. 18,314, it is defined as, "Natural or legal person, who by any means, requests, collects or provides funds to be used in the commission of any terrorist crime, such as, for example, seizing or attempting to seize a means of public transportation in service, attacking the head of state and other authorities, illicit association with the purpose of committing terrorist crimes, among others".

BRIBERY TO A NATIONAL PUBLIC OFFICIAL: According to Article 250 of the Criminal Code. "It is said that whoever offers or consents to give a public employee an economic or other benefit, for the benefit of the latter or of a third party", so that

- performs acts proper to his or her position for which he or she has no rights.
- For having omitted an act proper to his or her position. For having performed an act in breach of the duties of his or her position".

BRIBERY TO A FOREIGN PUBLIC OFFICIAL: Based on the provisions of Article 251 of the Criminal Code. "It is said that whoever offers, promises, or gives to a foreign public official an economic or other benefit, for the benefit of the latter or of a third party", so that

- Performs an act or omission with the aim of obtaining or maintaining any business or undue advantage in the context of any international transaction".

RECEIVING STOLEN GOODS: It is defined as the one who knowing its origin or could presumably know its origin., has in its possession, at any title stolen, stolen species, or objects of cattle, of reception or of undue appropriation, who transports them, buys, sells, transforms or commercializes them in any form, even if it had already disposed of them.

INCOMPATIBLE NEGOTIATION: Direct or indirect interest in any negotiation, action, contract, operation, or procedure in which someone intervenes, in relation to their position, goods, or equity, or not complying with the conditions established by the Law.

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CORRUPTION BETWEEN INDIVIDUALS: Requesting or accepting to receive / giving, offering, or consenting to give; an economic or other benefit, for oneself or a third party, to favor or for having favored in the exercise of one's duties the contracting with one bidder over another.

MISAPPROPRIATION: To those who, to the detriment of another, appropriate or distract money, effects, or any other movable thing that they have received in deposit, commission, or administration, or by another title that produces an obligation to deliver or return it.

UNLAWFUL ADMINISTRATION: Administrator of assets, which causes damage, either by abusing powers to dispose of it or oblige it, or by executing or omitting any other action in a way that is manifestly contrary to the interest of the owner of the affected assets.

INTRODUCTION OF POLLUTING AGENTS: The one who without authorization, or contravening its conditions or infringing the applicable regulations, introduces or orders the introduction into the sea, rivers, lakes or any other body of water, of chemical, biological or physical polluting agents that cause damage to the hydro-biological resources.

PROFIT OF PROHIBITED HYDROBIOLOGICAL RESOURCES: To process, support, transform, transport, commercialize and store prohibited hydrobiological resources, and to elaborate, commercialize and store products derived from these.

MISAPPROPRIATION OF BENTHIC RESOURCES: To carry out extraction activities in areas of management and exploitation of benthic resources, without being the owner of the rights.

RECEPTION OF HYDROBIOLOGICAL RESOURCES: To process, elaborate or store hydrobiological resources or products derived from them, regarding which it does not accredit their legal origin, and that correspond to resources in a state of collapse or overexploitation, according to the annual report of the Under secretariat.

ORDER A WORKER IN QUARANTINE OR COMPULSORY SANITARY ISOLATION TO ATTEND THE WORKPLACE: Whoever, knowingly and having the authority to dispose of the work of a subordinate, orders him or her to attend the place of performance of his or her duties when this is different from the place of domicile or residence, and the worker is in quarantine or mandatory sanitary isolation decreed by the sanitary authority.

ADMINISTRATION OF THE LEGAL ENTITY: Article 4° of the Law 20,393 defines the Administration of the Legal Person as the maximum administrative authority. This may be its board of directors, a managing partner, a manager, a chief executive, an administrator, a liquidator, its representatives, its owners, or partners, as appropriate to the form of administration of the legal entity, hereinafter the "Administration of the Legal Entity",

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CRIME PREVENTION OFFICER (EPD for its Spanish acronym): Person designated by the highest administrative authority of the legal entity responsible for the implementation, supervision, operation, and compliance with the Crime Prevention Model, as well as its updating, designated by the highest administrative authority of the legal entity. The position will have a duration of up to three years, which may be extended for periods of equal duration.

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

MPD CONTENT MANAGER: Corresponds to a physical or digital system that allows the creation of a support and administration structure for the files and documents that are a complementary part of the Crime Prevention Model.

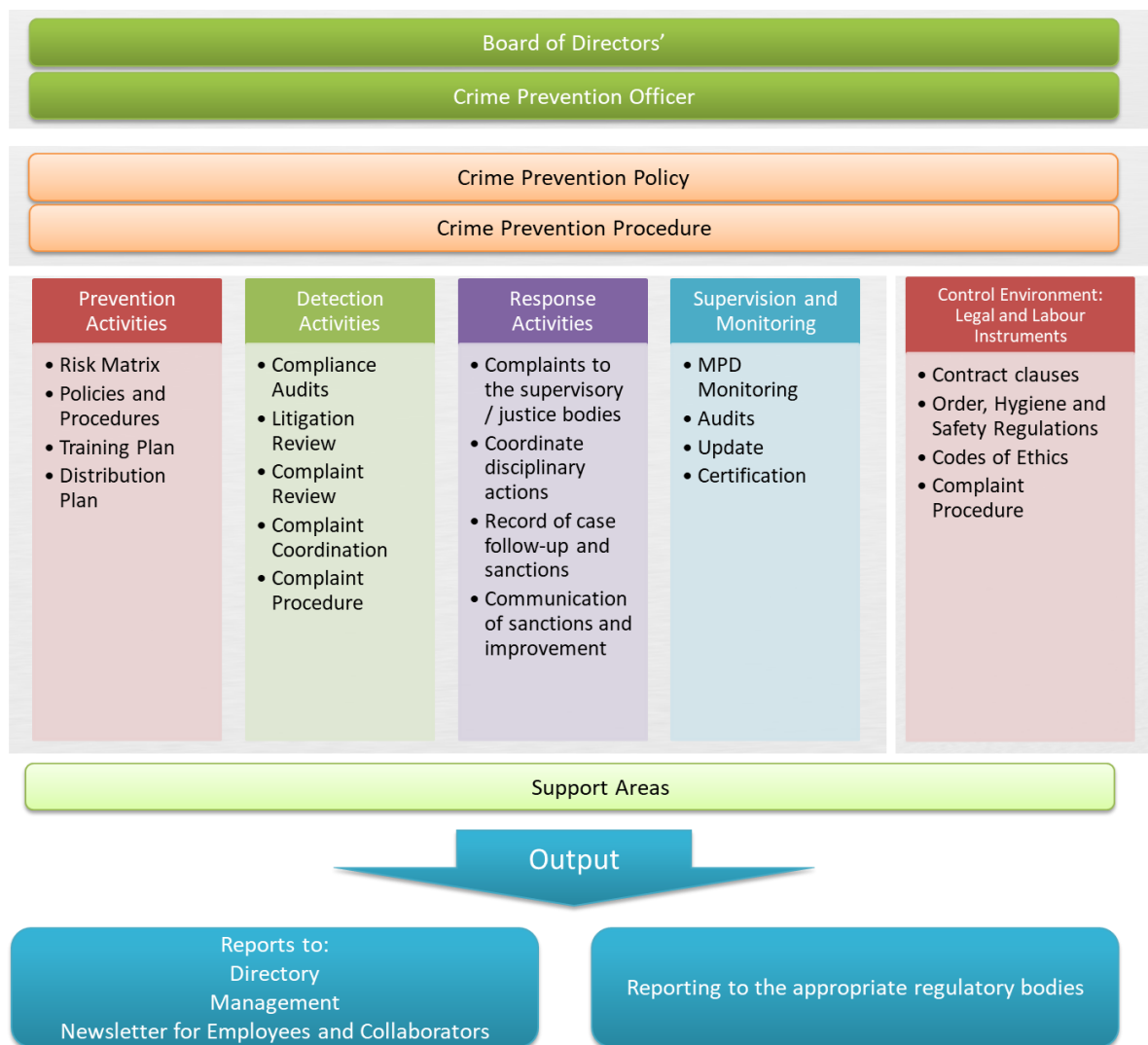
It is understood that any document named as an integral part of this manual, such as policies, procedures, minutes, among others, must be stored in this container either in digital or physical format and always corresponding to the latest valid version of the same.

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VI Crime Prevention Model

The Corporate Model of Crime Prevention of **GRUPO ANTARCTICA 21** has an organizational and operational structure that allows it to carry out diverse preventive activities, of detection and of answers on the processes inside the company that are exposed to the risks of commission of the crimes indicated in the law 20,393.

The MPD diagrams its design as follows:



The structure allows visualizing that the Model has the Board of Directors as the maximum administrative authority, which appoints a Crime Prevention Officer who structures Policies and Procedures that generate Prevention, Detection, Response, Supervision and Monitoring activities, and establishes a control environment.

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The various areas of the company and external advisors additionally support each activity of the Model.

This Model allows the company to be able to react and inform the Board of Directors, employees and supervisory bodies in a timely and effective manner when a crime is reported, while at the same time being able to correct its own structure to prevent a new commission of the acts involved, always safeguarding the confidentiality of the complainant.

VI.1 Appointment of a Crime Prevention Officer Law 20,393 (EPD)

GRUPO ANTARCTICA 21, through its respective highest administrative authorities, in this case the Board of Directors, shall appoint a Crime Prevention Officer (hereinafter "EDP"). The duration of the EPD position will be of 3 years that may be extended by the Board of Directors for periods of equal duration.

The EPD must be autonomous from the Administration of the Legal Entity (Board of Directors), its owners, its partners, its shareholders, or its controllers. To this end, Antarctica 21, through its highest administrative authority, will grant the EPD, through the minutes of the Board of Directors, total autonomy when it carries out tasks inherent to this function, independently of the tasks it carries out during its normal working day.

The identification of the Person in Charge of Crime Prevention as well as his or her respective designation can be found in the MPD Content Manager. Similarly, it is possible to find in this manager the communication to the staff and collaborators about this act of appointment.

VI.2 EPD Means and Faculties

According to Law 20,393, the Administration of the Legal Person must provide the Person in Charge of Crime Prevention with sufficient means and powers to carry out his or her functions, among which at least these shall be considered:

- a) The resources and material means necessary to adequately perform his or her duties, in consideration of the size and economic capacity of the legal entity.
- b) Direct access to the Administration of the Legal Entity to inform it in a timely manner by an appropriate means, of the measures and plans implemented in the performance of its duties and to report at least every six months.

VI.3 Establishment of a Crime Prevention System.

According to Law 20,393, the person in charge of Crime Prevention, in conjunction with the Administration of the Legal Person, must establish a crime prevention system for the legal person, which must include at least the following:

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- a) The identification of the activities or processes of the entity, whether habitual or sporadic, in the context of which the risk of committing the crimes set forth in Article 1 of Law 20,393 and its amendments is generated or increased.
- b) The establishment of specific protocols, rules, and procedures that enable the persons involved in the activities or processes indicated in the preceding subparagraph to schedule and execute their tasks or duties in a manner that prevents the commission of the aforementioned crimes.
- c) The identification of procedures for the administration and auditing of financial resources that will enable the entity to prevent their use in the aforementioned crimes.
- d) The existence of internal administrative sanctions, as well as procedures for reporting or pursuing financial liabilities against persons who fail to comply with the crime prevention system.

These obligations, prohibitions and internal sanctions must be indicated in the regulations that the legal entity issues for such purpose and must be communicated to all workers. These internal regulations must be expressly incorporated in the respective employment and service contracts of all the workers, employees, and service providers of the legal entity, including its top executives.

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VII Crime Prevention Policy, Law 20,393

The following policy establishes the principles and guidelines that the company has defined as 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 ensure that it maintains an organizational, administrative, and supervisory model suitable for the prevention of crimes called "Crime Prevention Model" or "MPD for its Spanish acronym", through which compliance with Law 20,393 shall be promoted.
2. The board of directors, management, executives, workers, and personnel dependent on the company must comply with the provisions of the MPD. The application, supervision and control of the norms established in this model will be the responsibility of the Person in Charge of Crime Prevention (EPD).
3. The duration of the Crime Prevention Officer appointed by the Board of Directors will be three years, and may be extended for periods of the same duration.
4. The Company's Board of Directors must provide the Officer in Charge of Crime Prevention with the means and faculties to carry out his/her functions, among which are considered the resources and material means necessary to adequately perform his/her tasks, in consideration of the size and economic capacity of the company; and the direct access to the high administration of the company to inform it in a timely manner through a suitable means, of the measures and plans implemented in the fulfillment of his/her tasks and to account for his/her management and report periodically.
5. The MPD establishes ethical standards that complement what is established in the various codes and internal regulations of the company, promoting an environment of transparency and fair competition, through the values, principles and standards established by the organization.
6. The MPD, the roles and responsibilities defined in this model and the sanctions established for non-compliance with it, must be disseminated and communicated by EPD to the entire company and its collaborators (external and internal).
7. The MPD must be regularly reviewed by the EPD and updated when there are relevant changes in the business conditions, in the internal or external environment of the company or in the legislation in force that affects it.
8. The MPD may be certified if the company deems it appropriate for its purposes and objectives.

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VII.2 Roles and Responsibilities

VII.2.1 The Board of Directors

1. Designate and/or revoke as appropriate the EPD, according to the provisions of Law 20,393.
2. Provide the means, resources, and access necessary for the EPD to fulfill its roles and responsibilities.
3. Approve the Crime Prevention Model.
4. Ensure the proper implementation and effective operation of the MPD.
5. Receive and evaluate the EPD reports on the MPD.
6. To inform the EPD about any situation observed, related to the noncompliance with the Law 20,393 and/or the procedures related to the MPD.

VII.2.2 EPD Responsibilities

1. Coordinate the committee sessions in which the EPD will present, if any, the complaints made to the MPD, the weaknesses detected, the suggestions for improvement of the policies, risk matrix, procedures, model, and this Manual, among others, with the aim of obtaining proposals and improvements.
2. To report **to the Board of Directors every six months**, on the status of the MDP, sessions of the Conduct and Ethics Committee, and matters of its competence and management.
3. To guarantee the correct implementation and operation of the MPD in accordance with its legal powers and duties, as well as in accordance with the rules established by the Board of Directors.
4. In case of legislative or normative modifications that affect it, the EPD must ensure the incorporation of the changes that are necessary to maintain the validity and operation of the MPD. Such modifications must be ratified by the Board of Directors.
5. Maintain a communication and training policy oriented to ensure that all members of the company and collaborators are aware of and comply with the protocols, policies, procedures, guidelines, and directives established in the MPD.
6. Establish a channel for complaints in accordance with the guidelines approved by this Manual.

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7. Lead and investigate in a confidential manner the complaints received or situations detected, generating an investigative folder. Eventually, it shall propose to the Board of Directors the sending of the background information to the pertinent auditing entity.
8. To safeguard the confidentiality of the complainants, the investigations and the information gathered.
9. To inform the Board of Directors in a timely manner, even before it meets for a session if necessary, of any crime or intolerable ethical conduct of which it should become aware, so that the latter may take the necessary measures.
10. The EPD shall monitor the effectiveness of the MPD through internal audits oriented exclusively to this model and independent of the internal audit schedule that may exist in the company. The audits should be stipulated in an annual audit plan.

VII.2.3 General Management

1. To ensure that Board-approved means and resources are available to enable the EPD to fulfill its roles and responsibilities.
2. To ensure the proper implementation and effective operation of the MPD.
3. To inform the EPD about new risks associated to the MPD that should be evaluated in the Risk Matrix.
4. Inform the EPD about any situation observed, related to the noncompliance with the Law 20,393 and/or the procedures related to the MPD.

VII.2.4 Management

1. Execute preventive and detection controls, defined in the MPD and its respective Risk Matrix.
2. To provide the information required by the EPD for the performance of its functions in relation to the implementation, operation, and effectiveness of the MPD.
3. Inform EPD about new risks associated to the MPD that must be evaluated in the Risk Matrix.
4. To inform the EPD about any situation observed related to the noncompliance with Law 20,393 and/or the procedures related to the MPD.

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VIII Crime Prevention Procedure, Law 20,393

The following procedure is an integral part of the MPD and establishes the guidelines on which the adoption, implementation, management, updating and supervision of the MPD is based.

The Procedure, as a system, is structured in the following activities:

VIII.1 Prevention Activities

They correspond to actions and elements aimed at eliminating any incentive to incur in conduct or omissions sanctioned by the MPD.

The elements associated with prevention activities are the following:

Risk Matrix

In the case of the MPD, the Risk Matrix is a powerful prevention tool that allows the identification of risks associated with the commission of crimes, existing controls, and the level of exposure of the company.

It is the responsibility of EPD, together with the Management, to prepare this matrix and keep it updated. For the purposes of this model, an annual review has been defined. This review can be advanced in the event of significant changes in the structure of the company or in the legislation in force.

The Current Risk Matrix can be found in the MPD Content Manager.

Policies, Procedures, and Instructions

It corresponds to the various documents established from the improvement of controls set out in the Risk Matrix. These prevention documents are attached to the operational procedures and allow the creation of controls that lead, in case of activation, to an investigation by the EPD.

The documents incorporated will be individualized in the risk matrix associated to the MDP and indicating the risks of crimes they mitigate.

The validity and implementation of the documents is the responsibility of the EPD.

The documents identified in this manual can be found in the MPD Content Manager.

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Training Plan

In order to disseminate the MPD and its various components, the EPD will generate an annual training plan for the various actors incorporated within the MPD and its procedures. In addition to training new staff entering the company.

The EPD should ensure:

- A clear control of the personnel to be trained. They should participate in the talks (distance or face-to-face) at least once a year.
- That the trainings include:
 - Explanation of the crimes specified in Law 20,393 and its complementary legislation, the latter depending on the activities and line of business of the company .
 - Brief statement of the contents of the Crime Prevention Manual, its policies, and procedures.
 - The program must include a differentiation in the training with respect to its content, depth, and periodicity, all according to the level of exposure to the risk of committing crimes specified in Law 20,393.
 - The concept of whistleblower and the importance of reporting.
 - Warning signs and the obligation to report. Examples of situations of risk of committing these crimes.
 - Disciplinary consequences, as well as legal consequences (civil, criminal, administrative) of non-compliance with internal and external regulations regarding Law 20,393. Responsibility of each employee with respect to this matter.
- Maintain a record of those attending the training sessions, this being part of the information to be reported.

The current training plan can be found in the MPD Content Manager.

Dissemination Plan

Communication actions will be taken regarding the Policy, Procedure and the MPD itself when applicable. Such communication should involve all levels of the organization, including the Board and Management. The communication will be carried out, by way of example, by:

- Intranet.
- Mass mailings.
- Billboards.
- Inclusion of MPD matters and their associated crimes in the company's induction programs.
- Others that the company deems appropriate.

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VIII.2 Detection Activities

They correspond to actions that detect eventual alerts from the control systems and procedures, or complaints received through the reporting channels.

The elements associated with the detection activities are the following:

- Execution of internal audits of compliance with the MPD
- Litigation Review
- Complaint Review
- Complaint Coordination
- Execution of the Complaint Procedure

VIII.3 Response Activities

They correspond to post-investigation actions expressed in action plans, disciplinary measures and/or sanctions to those who do not comply with the MPD.

The elements associated with response activities are as follows:

- Complaints to the control/justice bodies (if applicable)
- Coordinate disciplinary actions
- Record of case follow-up and sanctions
- Communication of sanctions and improvement

Sanctions

In the event of non-compliance with the aforementioned rules and controls, and taking into consideration the nature of the complaint made or the facts on which it is based, the investigation may be referred directly to the relevant authorities.

If the persons to whom this MPD applies fail to comply with its provisions and principles, they may be sanctioned. Such sanctions may include a verbal warning, a written reprimand, a fine, recording the facts for consideration in the future professional development of the offender within **GRUPO ANTARCTICA 21**, the termination of the contract in question and the possible reporting of the facts to the respective authorities. All of the above, depending on the nature and gravity of the facts and their consequences for **GRUPO ANTARCTICA 21**, its shareholders, and the market in general.

The rules and controls described in the MPD are of a preventive and educational nature, and under no circumstances shall they be of pre-police, investigative or repressive nature with respect to alleged illegal acts contained within or outside **GRUPO ANTARCTICA 21**.

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VIII.4 Supervision and Monitoring

The supervision of the MPD aims to ensure the proper implementation and management of each of its components.

The EPD together with the Administration of **GRUPO ANTARCTICA 21**, in compliance with Law 20,393, shall establish methods for the effective application of the model for the prevention of crimes and its supervision in order to detect and correct its flaws, as well as to update it according to the change of circumstances of the respective entity.

In compliance with the above, the MPD contemplates the following activities:

MPD Monitoring

Supervisory actions for which the EPD will have the power to request the support areas to provide various background information. Among the activities to be carried out, the following are contemplated:

- Reviewing supporting documents provided by the support areas.
- Reprocessing of control activities (through sampling).
- Verify that the limitations established in the procedures are fulfilled.
- Among others.

For activities that are based on sampling, the EPD should determine and document the criteria to be used.

External Audits

The EPD shall coordinate with the External Auditor in order to carry out an audit plan to review the implementation and execution of the MPD.

The results of such review should be reported to the EPD. Eventually such report may be submitted to the Board of Directors.

Updating of the MPD

As a result of the supervision and monitoring activities, and in addition to the results of the complaints procedures, the EPD should evaluate the need to update the MPD at least once a year. In order to update the MPD, the EPD should do the following:

- Review the new regulations to be used.
- Verify important changes in the company or in the market.
- Follow up on the improvements implemented to the control activities.

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According to the information obtained from the activities mentioned above, the EPD must update the company's risk and control matrix, as well as the corresponding policies and procedures.

MPD Certification

Once the MPD is implemented and put into practice, it can be certified by an external audit company, risk rating companies or other registered with the Financial Market Commission (Comisión para el Mercado Financiero.)

The request for certification will be made when the board of directors deems it convenient.

VIII.5 Control Environment

The control environment is made up of the clauses of contracts, regulations, codes, and complaint procedures generated or updated by **GRUPO ANTARCTICA 21** to mitigate and detect the commission of crimes stipulated in Law 20,393. Therefore, the EPD must ensure that these documents are in force, approved and known by those responsible and involved.

Internal Regulations

In compliance with Article 4 of Law 20,393, the Internal Regulations of **GRUPO ANTARCTICA 21** (the respective document being understood to have been duly formalized by Turismo Antártica XXI S.A. and Novantar S.A.) incorporate the obligations, prohibitions, and internal sanctions in relation to the crimes provided for in Law 20,393. The EPD shall ensure compliance with such incorporation and its updating when it is warranted.

The Internal Regulations can be found in the MPD Content Manager.

Complaint Procedure

To enable safe and reliable reporting for workers, collaborators and service providers, the Model incorporates a special reporting procedure.

Its design, implementation and management corresponds to the EPD.

This procedure guarantees the complainant confidentiality and his/her own protection, unless the auditing entity requests that the complainant is identified. In all scenarios, the EPD shall seek to ensure the safety and security of the complainant.

The procedure, in addition to capturing the complaint, activates the various entities that must review and investigate the complaint, with the EPD being ultimately responsible for following up on the complaint.

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VIII.6 Support Areas

The support areas correspond to the various actors identified as such in the Crime Prevention Procedures or as 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 Complaints

EPD is responsible for annual reporting to the Board of Directors:

- Status of complaints or non-existence of the same.
- Steps taken in the performance of its duty.
- Results of supervision activities.
- Proposed improvements.

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IX General Ethical Guidelines

The objective of the ethical guidelines and good practices is to formalize the principles and rules that internally regulate the business ethics and good practices of **GRUPO ANTARCTICA 21**, having as a background its legal nature and its current statutes, reinforcing the legal and regulatory rules in force, in order to ensure that the members of this company, who are governed by this Code of Ethics, always observe those rules of conduct that allow for the adequate resolution of those situations that could mean harm or damage to the company, clients, third parties and the market in general.

The application of the code regulates the conduct of all Directors, Executives, Shareholders, Customers, Suppliers and Employees.

IX.1 Standards of Conduct

All Directors, Executives, Shareholders, Clients, Suppliers and Employees of **GRUPO ANTARCTICA 21** must:

- Promote and maintain an environment of transparency in their activities according to their role and level of responsibility.
- Maintain labor and management relations on an ethical and integrity basis.
- Encourage and demand that all Directors, Executives, Shareholders, Clients, Suppliers and Employees of **GRUPO ANTARCTICA 21** fulfill their duties in an honest manner.
- Promote and respect the compliance of the relevant laws, rules, and regulations.
- Work with dedication, perfection, rectitude, probity and be consistent with the values and policies of **GRUPO ANTARCTICA 21**.

The company will not tolerate acts that deviate from the norms of ethical legitimacy and whose noncompliance may also cause harm to its shareholders, clients, employees, and other relevant persons or to the community in general.

The Directors, Executives and Employees of **GRUPO ANTARCTICA 21**, together with our Suppliers, are obliged to act in accordance with this Code.

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X Reporting Procedure

Although all the procedures in detail can be found in the MPD Content Manager, given their relevance for the correct implementation of the MPD, the following summary of the Complaint Procedure is presented:

1. For the purpose of making a complaint about the crimes, infractions or misconduct set forth in the MPD, whether presented by a worker, executive, director, supplier, contractor or third party, about the crimes, infractions or misconduct of which he or she is aware, there are the following channels of presentation:
 - a) Exclusive e-mail for the Crime Prevention Officer to receive and manage the reports: canaldenuncias@antarctica21.com
 - b) By certified mail addressed to the Crime Prevention Officer, **Antarctica 21** company, located in Libertador Bernardo O'Higgins 1170, 2nd floor Punta Arenas
 - c) Through a personal interview previously requested to the Prevention Officer.
2. The report can be made in a nominative or anonymous manner. In the case of a nominative denunciation, it will be under complete confidentiality and the denouncer will have to indicate his name, ID number, contact telephone and e-mail.

For an anonymous complaint, the denouncer must attach the background information that supports the complaint, or the complaint will not be considered.

The expected grounds for each report are:

- a) Type of infraction denounced; description of the facts; place and dates of reference; name or position of those involved.
- b) Narration of the act constituting the crime and details of how it was carried out or developed.
- c) Documents that prove the complaint, if any.
- d) Identification, when applicable, of other persons who witnessed the act.

The EPD shall contact the complainant, in case he/she indicates a contact channel, to report the reception of the complaint and the actions that will be taken, reiterating in such act the commitment of confidentiality of the information.

3. Complaints received by the EPD shall be analyzed, always safeguarding the confidentiality of the complainant and the accused, unless the investigation and the actions to be taken as a result require the disclosure of certain information. If the complaint involves the EPD, it should be reported to the company's Board of Directors so that another person or institution can be appointed to carry out the investigation.

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4. The EPD has the authority to contract for any investigative support services it deems appropriate.
5. During the investigation, the EPD shall respect the presumption of innocence of the person reported.
6. The results of the investigation shall be presented to the board of directors of the company.
7. The EPD shall inform the complainant of the results of the investigation and the actions taken, if the complainant indicates a channel of contact. If appropriate, and after confirmation by the Board of Directors, the EPD may disseminate the results of the investigation at the company level, always safeguarding the background of the complainant.