Our Crime Prevention Model (CPM)

CRIMES

Money Laundering

Bribery

Terrorist Financing

Influence Peddling

Collusion

Private Corruption

GENERAL MANAGEMENT

BOARD OF DIRECTORS



CHIEF CRIME PREVENTION (CCP)

ETHICS COMMITTEE

General Manager of Fenix, Manager of Internal Audit of Colbun, Chief of Internal Audit of Fenix.

SUPPORT AREAS Legal affairs, Internal audit and risks, Human management, Purchasing and

general services, Commercial. CONTROL ENVIRONMENT Code of Ethics Internal Work Policies and Management of Rules Procedures **Ethical Enquires** and Complaints HANDBOOK CRIME PREVENTION Improve Control Activities **Prevention Activities Detection Activities** Response Activities

REPORTS

- Reports to Board of Directors.
- Informative reports to other areas of the organization

COMPLAINS

 The Public Prosecutor's Office or the respective authorites

LEGAL INSTRUMENTS



ANTI-CORRUPTION CLAUSES IN CONTRACTS WITH SUPPLIERS AND CUSTOMERS



ANTI-CORRUPTION CLAUSES IN CONTRACTS WITH WORKERS

SUPERVISION, MONITORING AND UPDATING OF THE CRIME PREVENTION MODEL

