

CONFLICT OF INTEREST POLICY

GRUPO SECURITY S.A.

Version 1.0 - September 2021

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1. INTRODUCTION

Grupo Security S.A. and its subsidiaries (hereinafter, "**Grupo Security**"), as part of its corporate culture of compliance, prevention and transparency, hereby introduces the following Conflict of Interest Policy (the "**Policy**"), with the purpose of establishing a set of rules and guidelines to ensure that the activities of Grupo Security, its executives, directors and employees are carried out in a manner consistent with the integrity of Grupo Security.

2. REGULATORY FRAMEWORK

This Policy complies with Chilean law, in particular; Law 18,046 on Corporations and its Regulations and Law 21,314 of 2021.

3. CONFLICTS OF INTEREST

A conflict of interest arises when the interests, obligations or personal circumstances of a director, executive, shareholder, employee, or in general any Grupo Security person or entity, may influence decision making.

A conflict of interest is the incompatibility between the company's interests and those of any Grupo Security person or entity, when a particular transaction is executed by an employee on behalf of the company, while protecting their own interests or those of third parties with whom they have a business or family relationship or any other personal link. Equally, there is a conflict of interest when any Grupo Security person directly or indirectly enters into the same business as Grupo Security and that business has been prohibited. Where conflicts of interest arise, the failure to recognize this incompatibility indicates disloyalty to the company. In these circumstances, a Grupo Security person should not be involved in any matter in which they have a direct or indirect interest of any kind, where their objectivity or independence may be compromised. Clearly, a decision made by the company regarding a situation containing a conflict of interest may be based on the wrong reasons. But, even if these reasons are correct, such conflicts can affect an organization's reputation and damage private and public confidence in it. Although a conflict of interest has been defined above, there are countless circumstances that can be interpreted as a conflict of interest, based on the failure to recognize such an incompatibility.

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3.1. Types of conflicts of interest

The Conflict of Interest may be actual, potential or apparent:

- a) **Actual conflict of interest:** This is a situation in which a person's personal or professional interests either interfere or conflict with the interests or objectives of Grupo Security, affecting their ability to make objective decisions.
- b) **Potential conflict of interest:** This is a situation in which the person could be influenced in the future by a personal or professional interest when making a decision, given their role at Grupo Security.
- c) **Apparent conflict of interest:** This is a situation in which there are conditions that may reduce impartiality (or appear to do so) in the decisions that the person must make as part of their position or duties.

Conflicts of interest may also be direct or indirect:

- a) **Direct conflict of interest:** This happens when the Grupo Security person is the one involved in the conflict of interest.
- b) **Indirect conflict of interest:** This conflict of interest arises when it involves a company in which the company has an ownership interest or manages, or by an immediate or close relative of the Grupo Security person.

3.2. Causes of conflict of interest

There are numerous causes of conflicts of interest and they differ from one person to another. For example, the following circumstances give rise to the presumption of a conflict of interest situation:

a. Family Relationship:

- (i). **Between Grupo Security persons:** Any Grupo Security person that has family ties up to the second degree by blood or affinity

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with another Grupo Security person is in a situation of conflict of interest. This situation includes their spouse, partner or significant other.

(ii). With external parties to Grupo Security: Any Grupo Security person who has family ties up to the second degree by blood or affinity with a person outside of Grupo Security, who shares ownership or management relations with someone involved with Grupo Security—including a spouse, partner or significant other—is in a situation of conflict of interest.

b. Ownership Relationship: Any Grupo Security person is in a conflict of interest situation if they or their relatives up to the second degree by blood or affinity, their spouse, partner or significant other have an ownership interest in or own, directly or indirectly, a company or corporation that is related to Grupo Security.

c. Management Relationship: Any Grupo Security person is in a conflict of interest situation if they or their relatives up to the second degree by blood or affinity, their spouse, partner or significant other, participate in the management of a company or corporation that is related to Grupo Security. The person will be considered to participate in the management of said company if the Grupo Security person is a board member, representative, administrator, manager or executive with decision-making power in the company or entity.

d. Other Causes: The situations described above notwithstanding, whenever there is a situation where a Grupo Security person believes that they lack impartiality regarding a matter or decision as it may go against the duty of probity that governs their actions, they are obligated to take the measures listed below.

4. SCOPE OF APPLICATION

All Grupo Security persons are susceptible to conflicts of interest and are subject to this Policy, and in particular, but not limited to: (i) directors, (ii) managers, (iii) senior executives,

¹ First degree by blood includes My parents, My children (both natural and adopted). Second degree by blood includes My siblings, My grandparents, My grandchildren.

First degree by Affinity includes: My spouse, My in-laws, My children's spouses, My father's spouse, My mother's spouse. Second degree by Affinity includes: Spouses of my siblings, Grandparents of my spouse, Spouses of my grandchildren, my step-siblings (defined as the child of my parent's spouse with whom I share no blood ties).

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(iv) administrators; (v) shareholders, whether individuals or legal entities, directly or through third parties, with an interest equal to or greater than 10%, (vi) employees, and (vii) in general, any person who renders intermediary services with Grupo Security.

This policy has been developed in accordance with Grupo Security's structure, to identify the circumstances in which conflicts of interest may arise, and the internal reference policies that establish the mechanisms to prevent and manage such conflicts of interest. Particularly:

- Code of Ethics.
- Code of Conduct.
- Market Information Manual.
- Crime Prevention Policy.
- Internal Hygiene and Safety Regulations.

5. GENERAL PRINCIPLES OF CONDUCT

Each of the Grupo Security persons and corporate governance bodies must comply with the following guiding principles to properly fulfill their roles and responsibilities:

- **Probity:** All Grupo Security persons must behave in a morally impeccable manner, based on the principles of integrity and loyalty in the performance of their duties.
- **Responsibility:** Each of the directors, executives, shareholders and employees will act in compliance with the objectives of Grupo Security, its internal policies and applicable law, within their corresponding role.
- **Transparency:** An honest attitude is required, in accordance with the corporate values. Proactive behavior must be shown to avoid conflicts of interest and, should any occur, to provide the best mitigation measures to minimize the negative consequences derived therefrom.
- **Communication:** All persons subject to this Policy shall promptly disclose any actual, potential or apparent direct or indirect conflict of interest in which they may be involved.
- **Abstention:** Any person subject to the Policy who has a personal interest or a potential, actual or apparent conflict of interest must refrain from influencing or being involved in decision making or deliberations that may affect Grupo Security.

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- **Independence:** All persons subject to this Policy must always act with the goals, corporate values and objectives of Grupo Security in mind, with complete freedom of judgment and action, ensuring that their personal interests do not influence their actions.

6. **CONFLICT OF INTEREST OBLIGATIONS**

The following persons: directors, CEO, senior executives and managers of Grupo Security, in compliance with their reporting obligations, must submit a Declaration of Interests using the template provided by Grupo Security within 15 calendar days of taking office, which must be updated annually (Appendix II). Said Declaration of Interests will disclose, among others, the following: (i) the companies in which they have an ownership interest or manage, (ii) family ties up to the second degree by blood and affinity, their spouse, partner or domestic partner and (iii) the activities or positions they perform outside Grupo Security. The procedure is described in the following table:

Parent Company

Reporting Party / Type of Declaration / Reports to

	Grupo Security		
	Directors	Managers and Senior Executives	Executives
Initial declaration	Chairman / CEO	CEO / CPO	CPO
Updated declaration (due to changes)	Chairman / CPO	CEO / CPO	CPO
Annual updated declaration	Chairman / CPO	CEO / CPO	CPO
Responsible for requesting declaration	CPO	CPO	CPO

	Subsidiaries of Grupo Security		
	Directors	Managers and Senior Executives	Executives (via EXA platform)
Initial declaration	Chairman / CEO	CEO / CO	CO
Updated declaration (due to changes)	Chairman / CPO	CEO / CO	CO
Annual updated declaration	Chairman / CPO	CEO / CO	CO
Responsible for requesting declaration	CO	CO	CO

CPO = Crime Prevention Officer

CO = Compliance Officer

The following obligations must be diligently fulfilled by all Grupo Security persons and entities:

- a) You should consult your direct supervisor or manager. If a resolution is not possible, the company's Compliance Officer or Crime Prevention Officer must be notified in writing.

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- b) Refrain from making decisions, deliberating, participating directly or indirectly in any project, transaction, negotiation, decision, contract related to their personal or professional interests or those of related third parties.
- c) Declare any real, potential and/or apparent conflict of interest as soon as possible and no later than two days after becoming aware of any conflict of interest situation. (See form in Appendix III)
- d) Update their Declaration of Interest each year until there is no longer a conflict of interest. (See form in Appendix II)

7. CUSTOMARY POLICIES

This Policy is supplementary to the customary policies of Grupo Security already in force. Although a transaction may be considered customary, compliance with this Policy and the regulations governing conflicts of interest is an essential prerequisite.

8. RESPONSIBILITY, COMPLAINTS AND PENALTIES

All Grupo Security persons and entities are responsible for knowing, putting into practice and complying with this Policy.

After verifying and confirming non-compliance with this Policy, Grupo Security reserves the right to take disciplinary, administrative and even judicial measures against violators, which, if verified, will be considered a serious breach of their obligations.

If you become aware of or consider that any of the provisions and rules described above have been violated, you should report it through any of the following means provided by Grupo Security:

- Direct supervisor
- CEO of your company
- Email: cumplimientocorporativo@security.cl
- Complaint channel:

Persons making a complaint must act in good faith and on reasonable grounds. Should the testimony be proven to be negligent or made in bad faith, such action will be investigated and duly sanctioned.

9. EFFECTIVE DATE

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This Policy shall take effect as of September 30, 2021.

10. VERSION CONTROL

The Corporate Culture Department will be in charge of monitoring and periodically reviewing this Policy at least once a year.

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APPENDIX I
ACCEPTANCE OF AND COMMITMENT TO GRUPO
SECURITY S.A.'S CONFLICT OF INTEREST POLICY.

In _____ on _____, I _____, Tax ID No. _____, domiciled at _____, declare to know, accept and commit myself to fully comply with the **Conflict of Interest Policy of Grupo Security S.A.**, as well as to fully and opportunely comply with the obligation to inform the Culture Department (employees in general) and the Board of Directors (Directors of GS and subsidiaries), as soon as possible, and at the latest within the following two days from the time I become aware of any actual, potential and/or apparent conflict of interest.

[Name]

[Tax ID No.]

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APPENDIX II
DECLARATION OF INTEREST
GRUPO SECURITY S.A.

DATE: [____], 2021

1. DECLARANT'S INFORMATION.

FULL NAME	
TAX ID NUMBER	
LEGAL ADDRESS	
PROFESSION OR TRADE	
MARITAL STATUS	
POSITION AT GRUPO SECURITY	
AREA AT GRUPO SECURITY	

2. INFORMATION ON SPOUSE, COHABITANT OR PARTNER.

FULL NAME	
TAX ID NUMBER	
PROFESSION OR TRADE	
POSITION	
COMPANY	

(Mark with an X)

YES ☐ / NO ☐ spouse, partner or significant other holds a position and works for Grupo Security S.A. or any of its related parties.

If yes, please specify:

POSITION HELD	TIME IN THIS POSITION	CORPORATION OR COMPANY RELATED TO GRUPO SECURITY

YES ☐ / NO ☐ My spouse, partner or significant other has a direct or indirect stake or ownership in a company or corporation related to Grupo Security S.A.

If yes, please specify:

COMPANY OR CORPORATION	CORPORATE TAX ID NUMBER	OWNERSHIP INTEREST %	DURATION OF STAKE OR OWNERSHIP

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YES ☐ / NO ☐ My spouse, partner or significant other has a stake in the management of a company or corporation related to Grupo Security S.A. A stake in management is considered to exist if the person is a director, representative, administrator, manager or executive with decision-making power in the corporation or company related to Grupo Security.

If yes, please specify:

POSITION HELD	TIME IN THIS POSITION	CORPORATION OR COMPANY RELATED TO GRUPO SECURITY S.A.

3. INFORMATION ON DECLARANT'S RELATIVES.

Provide information on persons related to the declarant by blood or marriage up to the second degree by blood and affinity.

RELATIONSHIP	FULL NAME	TAX ID NUMBER	ACTIVITY

(Mark with an X)

YES ☐ / NO ☐ I have relatives up to the second degree by blood and affinity who work for Grupo Security or its related parties.

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If yes, please specify:

FULL NAME	RELATIONSHIP	POSITION HELD AT GRUPO SECURITY

YES ☐ / NO ☐ I have relatives up to the second degree by blood who have a stake in or are owners, directly or indirectly, of a company or corporation that is related to Grupo Security.

If yes, please specify:

FULL NAME	RELATIONSHIP	COMPANY OR CORPORATION	CORPORATE TAX ID NUMBER	OWNERSHIP INTEREST %	DURATION OF STAKE OR OWNERSHIP

YES ☐ / NO ☐ I have relatives up to the second degree by blood who participate in the management of a company or corporation that is related to Grupo Security. Participation in management is considered to exist if the person is a director, representative, administrator, manager or executive with decision-making power in the company or enterprise related to Grupo Security.

If yes, please specify:

FULL NAME	RELATIONSHIP	POSITION HELD	TIME IN THIS POSITION	CORPORATION OR COMPANY RELATED TO GRUPO SECURITY

4. ECONOMIC ACTIVITY OF THE DECLARANT

(Mark with an X)

YES ☐ / NO ☐ I have an ownership stake in or participate in management of legal entities. If yes, please fill in the following table:

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I declare that I have ownership stake in and/or participate in management of the following legal entities:

LEGAL NAME	TAX ID NUMBER	TYPE OF COMPANY	OWNERSHIP INTEREST %	MANAGEMENT ²

5. **ACTIVITIES OUTSIDE GRUPO SECURITY**

(Mark with an X)

YES ☐ / **NO** ☐ I conduct activities outside Grupo Security S.A. (academic, non-profit, independent activities, among others).

If yes, please fill in the following table:

I declare that I perform the following activities or do these jobs outside Grupo Security:

POSITION/ACTIVITY	VENUE

DECLARATIONS

I declare that the information provided in this Conflict of Interest Statement is true and accurate. I undertake to inform, as soon as possible, whenever a relevant fact that modifies its content takes place.

I authorize that my declaration be brought to the attention of my Supervisor, Human Resources Manager, Compliance Officer and the authorities that Grupo Security deems appropriate for the purpose of taking the necessary measures to analyze and address the conflict of interest and mitigate the associated risks.

In the event of holding the position of director, CEO, senior executive or manager of Grupo Security, this declaration must be updated annually in January, as indicated in Grupo Security S.A's Conflict of Interest Policy.

² Participation in management is considered to exist if the person is a director, representative, administrator, manager or executive with decision-making power in the company or enterprise.

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DECLARANT'S SIGNATURE

APPENDIX III
STATEMENT OF ACTUAL, POTENTIAL AND/OR
APPARENT CONFLICTS OF INTEREST

In _____, on _____, I _____, Tax ID No. _____, domiciled at _____, declare under oath: that in order to opportunely comply with the obligation to report any conflict of interest that may arise, I declare and notify Grupo Security S.A. that the following situations, in my opinion, could eventually be considered a conflict of interest:

Person / Company Name	
TAX ID NUMBER	
Business line / Activity	
Type of relationship or kinship	
Description of the situation	

Person / Company Name	
TAX ID NUMBER	

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Business line / Activity	
Type of relationship or kinship	
Description of the situation	

I declare under oath that the information provided is true and accurate, and that I am aware of my responsibility to report, as soon as possible, any changes in the information provided.

Signature

[For Internal Use by Grupo Security]

[Recipient of declaration]	
Date	
Signature	

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