
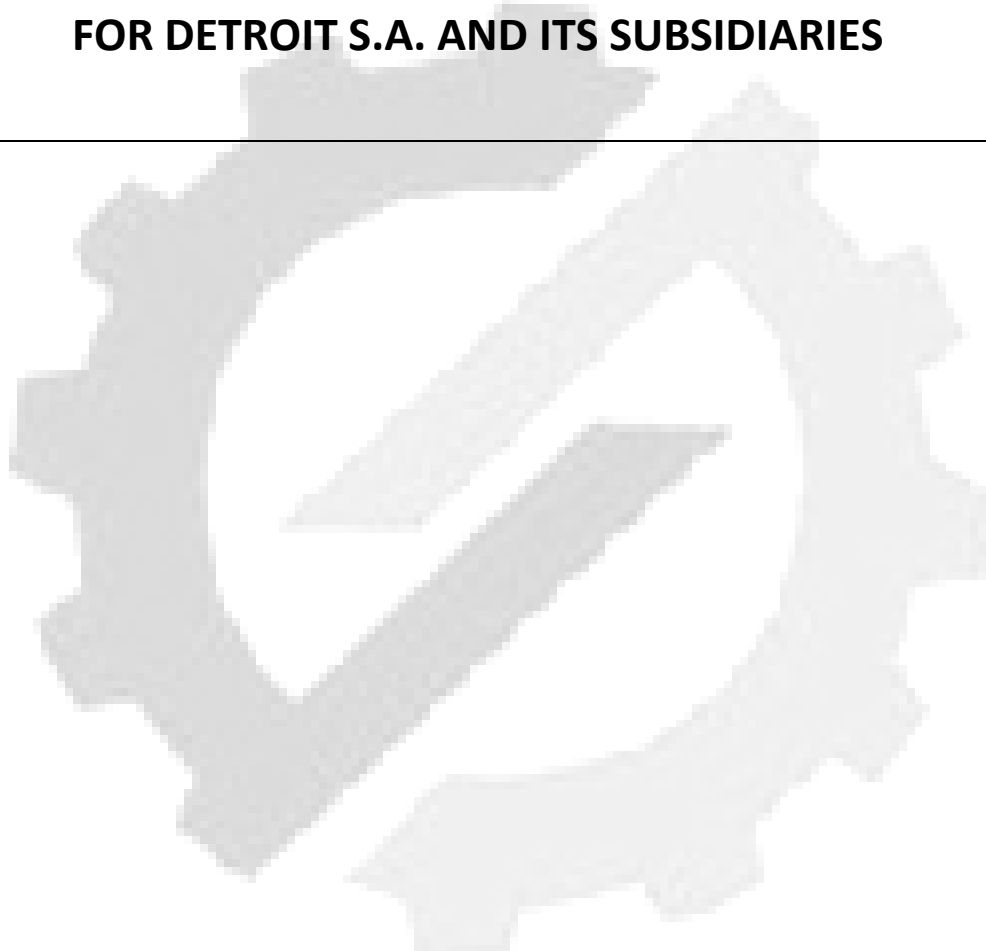



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DETROIT S.A.

CORPORATE CODE OF CONDUCT FOR DETROIT S.A. AND ITS SUBSIDIARIES




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Document approved by the Board of Directors of DETROIT S.A., dated August 19, 2012, updated version dated May 31, 2018. Last updated version dated April 30, 2020.

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1. INTRODUCTION

The establishment of a Corporate Code of Conduct for Detroit S.A. and its subsidiaries aims to highlight the commitment of this company to promote an ethical behavior in its labor relations, commercial operations and, in general, in all the actions in which the Head Office or one of its subsidiaries intervenes, regardless of the geographical location where it develops its activities and/or functions.

The Code of Conduct is a document that contains a set of norms that regulate the behavior of those who work in Detroit S.A. and its subsidiaries. This Code establishes an ethical framework of principles, values and conducts, which should govern the commercial and labor performance of society, as well as the behavior of its collaborators and/or advisers, and being mandatory for all its officials.

The main objective of the Corporate Code of Conduct is to maintain a line of behavior for all members of the organization, providing a positive work environment for its collaborators and/or advisers, so that they can relate in the best possible way to customers, suppliers, private and public institutions and the community in general.

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2. SCOPE


This Corporate Code of Conduct is mandatory for all workers, managers or executives of the company and other external collaborators, whether they are contractors, subcontractors or advisers to Detroit S.A. and its subsidiaries.

It is the responsibility of each and every one of them to read, know and strictly comply with the rules of this Code of Conduct and each official must sign a "Declaration of Reception" of this Code of Conduct, as a sign of acceptance and reading. In contracts with external companies, the contractor is responsible for ensuring that its workers strictly comply with this code.

This Code of Conduct is a complement to the Employment Contract, the Internal Regulations of Order, Hygiene and Safety, and to the norms and procedures that regulate the performance of their functions of officials and collaborators and/or advisers; norms and procedures that are their responsibility to know and comply with.

Any questions that arise in relation to this Code of Conduct should be presented to the immediate superior manager. This Code is incorporated into the company's website www.detroit.cl in addition to the intranet.

Detroit S.A. reserves the right to modify this Code of Conduct, at any time or in any circumstance, which will be communicated to collaborators and/or advisers.

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3. PRINCIPLES THAT INSPIRE THE ACTIONS OF DETROIT S.A. AND ITS SUBSIDIARIES

3.1. Objective


Attend to the needs of our clients with highly qualified personnel, respecting our commitments based on pillars: Safety, Quality, Delivery Term and Integration, generating positive results for our shareholders.

3.2. Vision

To be recognized in the market for delivering a high-quality service and be a benchmark company and leader in the activities in which it participates.

3.3. Values

- Safety: We value our staff, for this reason we carry out our work giving priority to the safety of our people.
- Quality: With our highly qualified staff we deliver services and constructions of the highest quality and technology.
- Delivery Term: Our works and services are carried out in the terms agreed with our clients.
- Integration: We develop our activities working with our clients, suppliers and related parties as long-term strategic partners.
- Ethical, fair, responsible and balanced behavior with clients, officials and external collaborators, and a friendly relationship and of service with the community,
- Respect towards our workers, collaborators and/or advisers and their families.
- Commitment to the sustained and sustainable development of the country and the regions in which we operate, respecting and complying with environmental regulations.

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4. PRINCIPLES OF CHILE AND BUSINESS RULES OF CONDUCT

4.1. Principles

Foolproof efficiency

It implies the sum of efficiency, continuous improvement and motivation in what is carried out, which generates a final result of quality and gives to whoever carried it out, an additional value to their work that denotes a marked and positive difference with other people that work in other companies in similar activities, satisfying the needs of the client at the same time.

Integrity

Integrity is conceived as a transparent attitude, inspired by rectitude and probity, which motivates us to act in accordance with those values and treating everyone fairly.


Commitment

Commitment is the stamp of our work, which implies a high sense of duty, and the faithful and exact fulfillment of our obligations in the different aspects of our activity.

Teamwork

Teamwork is undoubtedly a high value component of Detroit and its subsidiaries. Those who make up the organization are committed to achieving the objectives of the tasks assigned, emphasizing teamwork. In this way, the necessary synergies are generated to carry out the entrusted work efficiently and with high-quality results.

Perseverance

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Perseverance is doing everything necessary, within the legal framework, prevailing the safety of people and the environment, in order to achieve the proposed goal. Detroit and its subsidiaries do everything necessary to fulfill the commitments they acquire, whether with their customers, suppliers or collaborators, ensuring that the goods they sell, or the services they provide, are adequate and of excellence.

Consequential

The actions, services and other tasks carried out by Detroit and its subsidiaries must be logically consistent with the principles it professes. Every time we carry out a task we must therefore be persevering, upright, carry out work of excellent quality and as a team, and with respect for our colleagues, collaborators and clients, being honest and responsible for what we do or do not do. Therefore, if an unforeseen event arises in our activity, this situation is communicated in a timely manner, thus avoiding affecting the rest of the team that we form, and especially our client.


Respect

Respect means to have consideration and deference to those around us, whether in daily work, in our homes, or in any situation, while it also implies respecting authority and considering their dignity. Mutual respect in our work activities, in all its scope, contributes to the growth and development of each of the members of Detroit S.A. and its subsidiaries. It is a guarantee of transparency and creates an environment of cordiality and security, that allows the acceptance of the limitations and the recognition of the virtues of others.

Honesty

Honesty, which implies being truthful, upright and honorable, is one of the qualities that is most appreciated, and that is why we seek and demand honesty in the people who work at Detroit S.A. and its subsidiaries, which we consider essential for our interpersonal relationships and with our clients to be developed in an environment of sincerity, trust and harmony.

Responsibility

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Being responsible implies assuming the consequences of what we say, do or don't do and, of course, of the commitments we make, both when that attitude results in satisfactory situations, or when our acts or omissions lead to adverse and non-gratifying results. Acting responsibly is, in other words, doing our job in the best possible way, being efficient and honest.


4.2. Rules of conduct in our daily activities

All our collaborators, internal or external, of the Head Office or its subsidiaries, must fulfill their obligations and carry out their tasks, not only inspired by the aforementioned principles, but also strictly subject to what the law orders, as well as:

- Promote and cultivate, within the company, a healthy coexistence and mutual respect among all members of the organization.
- Fully comply with the provisions established in the Internal Regulations of Order, Hygiene and Safety.
- Know, apply and transmit the values and principles that underpin the work of Detroit S.A. and its subsidiaries.
- Watch over and care for the image and prestige of Detroit S.A. and its subsidiaries.
- Practice healthy fellowship and loyalty, as values that encourage the spirit of the collaborators of Detroit S.A. and its subsidiaries.
- Ensure transparency and probity in all company acts, in accordance with current laws, regulations and internal regulations.
- Protect and care for the dignity of coworkers and respect individual, cultural, gender, ethnic, religious, ideological or other differences.
- Provide our customers and suppliers with a kind, deferential, diligent and timely treatment, permanently contributing to the fulfillment of the objectives and goals that Detroit S.A. and its subsidiaries mean to achieve.
- Caring for the environment and the sustainability of the processes carried out.
- Care of the resources and assets of the company and clients.

4.3. Rules of conduct in business

Conflict of interests

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A conflict of interest arises when the personal and own interests of a collaborator, whatever position they hold within the organization, interfere with their ability to make a good decision regarding the interests of the company; or when a collaborator, whatever their position, or a member of their direct family or someone with whom they have an open friendship, have interests that may hinder the effective performance of that collaborator's obligations to the company. A conflict of interest is considered to exist, for example, when a decision adopted in the performance of the attributions of a collaborator is affected or interfered by a situation of personal or third-party benefit, unrelated to the interests of Detroit S.A., its subsidiaries and/or its clients, regardless of whether or not that decision affects the interests of the company. In order to effectively control the existence or not of a conflict of interest, our company prepared a document-declaration on the matter, which must be signed annually by the workers of Detroit S.A. subsidiaries and related companies, third parties, such as providers, and must inform, in any case and time, if they have doubts or are in a situation of conflict of interest.


Confidential information

Confidential information of Detroit S.A. and its subsidiaries is understood to be that whose content, created, acquired, controlled or transferred to Detroit S.A. and its subsidiaries, must be protected from public knowledge, either because it contains essential aspects related to the company in question or because its public knowledge is closed by confidentiality agreements signed by Detroit S.A. and its subsidiaries with a third party.

Each one of the collaborators of Detroit S.A. and its subsidiaries must guarantee that, the information that is under their knowledge, direction and/or control, is adequately protected, not being able to reveal it, either for their own benefit or for purposes outside the company, even when their contract has ended. The collaborator in question, in case he/she does not need to continue using this confidential information in his/her activity, must proceed to return, to his/her immediate boss, all the documents, software, files, plans, designs and other background information or records that contain confidential information. The same must be done in the event of termination of the employment relationship.

No discrimination

At Detroit S.A. and its subsidiaries everyone receives the same treatment. None of them will be discriminated against for reasons of gender, marital status, age, religion, race,

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political opinion, social and economic class, pregnancy, language, dialect, ethnicity, nationality, sexual preference or disability.

Anticorruption

Detroit S.A. and its subsidiaries do not accept and oppose all kinds of corruption, extortion and bribery. It does not tolerate business practices that seek to obtain advantages through the use of undue or improper means. No collaborator and/or advisor is authorized to carry out activities that may compromise the organization, in acts or in appearance, with the aforementioned acts.

Consumption of alcohol and licit drugs


Each collaborator of the company is responsible for adopting the appropriate measures to avoid work accidents, illnesses and contribute to a safe and healthy work environment. This obligation includes responsible behavior regarding the use of alcohol and drugs, and employees are required to report to work in adequate mental and physical conditions to carry out their job functions satisfactorily and effectively.

It is strictly forbidden to work under the influence of alcohol or any drug, to sell, use, manufacture or distribute any drug during working hours and on or off company premises. The use of medications in the workplace is allowed, with or without a prescription, only if it does not affect the worker's ability to perform his essential functions efficiently and safely.

Sexual and workplace harassment

Sexual harassment includes any inappropriate sexual hint or suggestion, request for sexual favors, or other verbal or physical conduct of a sexual nature, which interferes with work, conditions employment, or creates an intimidating, hostile, or offensive work environment. Some behaviors that constitute sexual harassment include:

- Unwelcomed sexual advances
- Verbal conduct of sexual nature
- Physical conduct - touching someone unnecessarily or offensively, or preventing or blocking the movement of a person
- Show sexually suggestive objects or pictures.

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In Detroit S.A. and its subsidiaries, any type of sexual harassment is absolutely prohibited and administrative measures will be taken in the cases of filed, investigated and verified complaints.

Gifts and invitations


Giving or receiving gifts and invitations may create a conflict of interest, or from such invitations, under certain circumstances, such a conflict could apparently be understood. Accepting money or giving money as a means of gift or invitation is strictly prohibited.

However, gifts can be received, as long as they do not exceed the value of UF 1 (one “Unidad de Fomento”). In the event that the official of the company and its subsidiaries and related companies considers that refusing to receive a gift or invitation that exceeds this amount, considering the commercial relationship that exists with the client, could affect the relationship with the client, they must always request in advance, authorization from their hierarchical superior, who may or may not grant such authorization. The latter must inform the Regulatory Agency, through its Compliance Officer, of what has been resolved. Any gift, invitation, special attention, among others, should never create an appearance of conflict of interest, nor should it constitute a violation of current laws. All Detroit S.A. officials must refrain from giving gifts, under any title or nature of this.

Health and safety


The protection of health, safety and the environment are primary objectives of Detroit S.A. and its subsidiaries. The company strives to develop and provide products and services that have the highest standards of safety for the environment, and to prevent adverse environmental impacts.

All employees must carry out their tasks and responsibilities in compliance with current legislation and standards related to health and safety in the workplace and to the prevention of environmental contamination.

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5. ACTIONS OF THE COLLABORATORS

When a collaborator faces a situation, with which they have doubts or are not sure if it is a behavior that is in conflict with this Code of Conduct, and cannot resolve the situation by applying the principles and standards outlined in this Code, they should then consult their immediate direct superior about how to proceed.

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6.- DISCIPLINARY MEASURES

Any breach of the Code of Conduct by executives, employees, contractors, subcontractors, collaborators and advisers will be investigated, determining the application of disciplinary measures by the corresponding Corporate Management, after a brief and concise administrative inquiry by the company's legal advisor, who must collect as much background information as possible and, within a period not exceeding 30 days, may propose the sanction that he/she deems appropriate depending on the offense, and if the offender is a repeat offender.

The disciplinary measures, without constituting an order of priority are:

- 1.- Oral warning
- 2.- Written warning
- 3.- Reduction of remunerations up to 50% for a period of up to 3 months
- 4.- Termination of the employment and/or service contract

In addition to the person who fails to comply directly with this Code of Conduct, all those involved will be subject to disciplinary measures, including those who fail to comply with their obligation to avoid and prevent an infringement of this Code, the people who are asked to disclose information and/or withhold material information on the breach, and the supervisors who approve or allow the breach, or attempt to retaliate against collaborators and/or advisers for reporting breaches or people responsible for the breach of this Code of Conduct.


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7.- DENOUNCEMENT CHANNELS

Any direct collaborator, contractor or subcontractor, consultant or third party, who are aware of any fact that is in conflict with the rules of this Code, may bring it to the attention of the company, making use of the denouncement channel that appears on the website of Detroit S.A. www.detroit.cl and in the email denuncia@detroit.cl. In addition, all the employees of the company and its subsidiaries can access the intranet site where they can also make the denunciations that are the subject of this Code.

All reports will be attended to immediately, and the complainant's reservation is guaranteed.

For the purposes of keeping a record of internal administrative inquiries and possible administrative sanctions, there will be a book of infractions in charge of the company's legal adviser and the Systems and Operations Management.

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8.- UPDATES

8.1- Update procedure.

The Regulatory Agency of the Criminal Preventive Model is responsible for keeping this Corporate Code of Conduct up-to-date, through its Crime Prevention Officer. Any modification or update made to it will be made known through the established channels to all collaborators of the company Detroit S.A., subsidiaries and/or related companies. This review constitutes N° 3 of the Corporate Code of Conduct and was carried out on April 30, 2020.

8.2- Scope of the last revision.

- April 30, 2020.-**
- 1) The denouncement channels were updated.
 - 2) New disciplinary measures were added, without constituting an order of priority.
 - 3) Administrative inquiry procedure (brief and concise) is incorporated in the case of violation of this Code.