




COMPLIANCE Management System	Corporate Procedures	Page 1 of 4
	EXTERNAL DUE DILIGENCE SURVEY.	Reviewed by Supervisory Body
(MIS) Management Integrated System	Review N° 1 Date 4.30.2020	Approved by Detroit S.A. Board

EXTERNAL DUE DILIGENCE SURVEY	
<p>1. Specify if there is a compliance program implemented in your company, as per Law 20,393, UK Bribery Act, FCPA or other anti-corruption regulation. (Attach backup of the policies and/or procedures that support the program of your company). YES ___ NO ___</p>	
<p>COMMENTS:</p> <hr/> <hr/>	
<p>2. Does your company organize anti-corruption related trainings (Law 20.393, UK Bribery Act, FCPA, others)? Provide details in terms of frequency of the trainings and the positions the company does the trainings. YES ___ NO ___</p>	
<p>COMMENTS:</p> <hr/> <hr/>	
<p>3. ¿Does your company include contractors or providers, who provide you with services/products, to the anti-corruption related trainings? YES _____ NO _____</p>	
<p>COMMENTS:</p> <hr/> <hr/>	
<p>4. Does your company have a Code of Ethics? Is it known by your company? YES _____ NO _____</p>	
<p>COMMENTS:</p> <hr/> <hr/>	
<p>5. Does your company have a complaint line and a mechanism to file complaints?, What is the access level? YES _____ NO ___</p>	
<p>COMMENTS:</p> <hr/> <hr/>	
<p>6. Is there a process / model /system for criminal risk control (bribery, money laundry, financing of terrorism, concealment, among others) in your company? YES _____ NO _____</p>	
<p>COMMENTS:</p> <hr/> <hr/>	
<p>7. Does your company control the provision / reception of gifts /invitations to public / private officials? Provide details. Answer YES _____ NO _____</p>	
<p>COMMENTS:</p> <hr/> <hr/>	
<p>8. Does your company administer / regulates the business relationship and/or interactions with public officials? Provide details. YES _____ NO _____</p>	
<p>COMMENTS:</p> <hr/> <hr/>	
<p>9. Is there a background checking process in your company before establishing a business relationships with third parties? Provide details. YES _____ NO _____</p>	
<p>COMMENTS:</p> <hr/> <hr/>	


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<p>10. Is there a program related to Modern Slavery (child labor, use of coercion, forced labor, slave trade, among others) in your company? Attach backup of the policies and/or procedures that support the program in your organization or mention those main activities. YES ___ NO ___</p>			
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COMMENTS:			
<p>11. Does your company do a follow-up to the compliance of the regulation related to Modern Slavery to its providers or supply chain? Mention the main monitoring activities. YES ___ NO ___</p>			
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COMMENTS:			
<p>12. Is also any CEO, senior management executive or director of your company currently a Politically Exposed Person (PEP) or a public official? Has this situation happened in the past (up to 1 year)? Provide details. YES ___ NO ___</p>			
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 2px;">COMMENTS:</td> </tr> <tr> <td style="height: 15px;"></td> </tr> <tr> <td style="height: 15px;"></td> </tr> </table>	COMMENTS:		
COMMENTS:			
<p>13. Has your company, or any related corporation (the holding of your company or a subsidiary) been subject to any investigation that began based on an accusation for illicit act commissions related to corruption (national and/or international) within the last 5 years? YES ___ NO ___</p>			
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COMMENTS:			
<p>14. Is your company or any employee, CEO, senior management executive or director of your company currently subject to an investigation for any illicit act of corruption (national and/or international)?, Has this situation happened in the past? YES ___ NO ___</p>			
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="padding: 2px;">COMMENTS:</td> </tr> <tr> <td style="height: 15px;"></td> </tr> <tr> <td style="height: 15px;"></td> </tr> </table>	COMMENTS:		
COMMENTS:			
<p>15. Does your company comply with (including policies, procedures, and technical and organizational measures that are necessary to comply with it on site) the application of protecting data, laws and regulation of private data and safety of information – including where the UK Data Protection Act is applicable? YES ___ NO ___</p>			
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COMMENTS:			
<p>I state that the information provided in this form is, to the best of my knowledge and belief, current, accurate and correct.</p> <p>COMPANY:</p> <p>NAME OF LEGAL REPRESENTATIVE:</p> <p>ID N° OF LEGAL REPRESENTATIVE:</p> <p>SIGNATURE:</p> <p>DATE: ____/____/202_</p>			

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INSTRUCTIONS TO ANSWER THE DUE DILIGENCE SURVEY

QUESTION 1. In the event the answer is YES, in 'Comments' please: explain how its Compliance Model works, mention the policies and/or existing Procedures in its company, that support its Model, attach them ideally.	QUESTION 2. In the event the answer is yes, it is BINDING to provide a comment about the frequency of the trainings and the positions of the company that participate in the training.
QUESTION 3. In the event the answer is YES, specify the type of training (in person, e-learning, or other method), frequency of the training.	QUESTION 4. If the answer to this question is yes, please specify in comments what subjects are in the Code of Ethics/ Code of Conduct and how well known is in your company. Attach document ideally.
QUESTION 5. In the case of an affirmative answer, please describe the mechanism (telephone, ad-hoc System, e-mail, or other) and specify who have access to use such complaint mechanism. Example: all employees, contractors, etc.	QUESTION 6. The question specifically refers to processes / model / system for criminal risk control related to corruption crimes (bribery, money laundry, financing of terrorism, concealment). The answer is affirmative ONLY if such model / system is also certified by an independent company.
QUESTION 7. If the answer to this question is affirmative, it is BINDING to provide comments, specifying the details of the activities considered in your company.	QUESTION 8. If the answer to this question is affirmative, it is BINDING to provide comments, specifying the details of the activities considered in your company.
QUESTION 9. If the answer to this question is affirmative, it is BINDING to provide comments, specifying the details of the activities considered in your company.	QUESTION 10. Please answer yes if your Company Includes any program, regulation related to slavery such the UK Modern Slavery Act.
QUESTION 11. Consider the following definitions to answer questions 10 and 11. <ul style="list-style-type: none"> • Child Labor: Job that deprives children from their childhood, their potential and their dignity, which is detrimental for the physical and mental development. • Use Of Coercion: To exert pressure on a person to force a conduct or a change to his/her will. • Forced Labor: Any service demanded by threatening a person and for which he/she has not offered voluntarily. • Slave Trade: Purchase and sale of people where the victim has submitted him/herself to the authority of another person. 	QUESTION 12. Please provide details if the answer is affirmative. Politically Exposed People (PEP): "Chileans or foreigners who work or have worked in relevant public services in a country up to at least one year after the exercise of their duties". For more information of people considered PEP, please go to the Financial Analysis Unit FAU. (http://www.uaf.cl/entidades/politica_cat.aspx)
QUESTION 13. The question includes companies related to your organization, holding, or any subsidiary of your company if this is the case.	QUESTION 14. The question refers to ANY STAGE OF THE INVESTIGATION, including before the possible people involved have been accused.
QUESTION 15. If the answer is affirmative, please provide a description / evidence of the policies, protocols safety measures on site (for example, certifications of data safety, details on any transfer with personal data of the EU to a country not belonging to the EU, and confirmation of the guarantees it has to protect the personal data processing in relation to the relevant services.	

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