



## INTEREST CONFLICT`S MANAGEMENT POLICY

VALUES THAT REFLECT OUR CORPORATE CULTURE



## What is the **objective** of the **Conflict Management Policy of Interest**?

This **Conflict of Interest Management Policy** (hereinafter, the "Policy") is intended to establish and regulate the general principles of action, as well as the procedure to follow in the event of a potential **conflict of interest**.

In this sense, this Policy is mandatory for all **Directors, Managers and employees** (hereinafter, the "Personnel") of GRUPO ALDESA, SA, as well as any of its subsidiaries, regardless of its corporate purpose and geographic location.

## What is **understood by conflict of interest**?

**Conflicts of interest** shall be understood as any situation in which the interest of the Group with the particular interest or benefit of the Personnel or of a person linked to it comes into collision, directly or indirectly.

For these purposes, persons linked to the **Personnel will be considered:**

- a. Couple or people with similar relationship of affectivity.
- b. The ascendants, descendants and siblings of the Personnel, or their spouse.
- c. Couple of ascendants, descendants and siblings of staff.
- d. The societies in which the Personnel, by itself or by interposed person, are in some of the situations contemplated in the first section of the article 42 of the Code of Commerce.
- e. People closely linked to Personnel as a result of a special relationship of friendship.

Likewise, it will also be understood that there is a conflict of interest when the personal interest of a specific member of the Group, or of a person linked to it, influences, or can influence, significantly in the adoption or execution of decisions within the framework of a relationship Commercial or transactional.

## What **should we do** in case of detecting a **conflict of interest**?

In general, when the Personnel is affected by a situation of risk of conflict of interest, they must immediately **notify** the competent areas for evaluation and analysis, **refraining from influencing** the execution and decision-making.

## What are the **consequence** of a **breach of the Policy**?

Compliance with the provisions of the Policy is the responsibility of each and every one of us. However, failure to comply may imply the **application of appropriate sanctioning measures**, all in accordance with the provisions of the Group's disciplinary regime.



Chile

Colombia

Denmark

Guatemala

Hungary

India

Mexico

Norway

Peru

Poland

Portugal

Romania

Slovakia

Spain

Uruguay



[www.grupoaldesa.com](http://www.grupoaldesa.com)

**Regulatory code:** POL-CUMPL-04

**Review version:** Rev. 01

**Date:** 04/01/2022