Risk Management Policy Territoria. Territoria, comprised of El Olivar SpA, Territoria SpA, Territoria Asset Management SpA, Territoria Apoquindo S.A., Territoria Santa Rosa SpA, SIR Desarrollo Inmobiliario II SpA and Fondo de Inversión Privado Apoquindo, is committed to promoting sustainable urban development and creating value for all its stakeholders. To achieve this objective, the company's social responsibility includes unconditional respect for human rights, full compliance with its labor obligations, environmental responsibility, and building positive relations with the community.

Anyone who believes that any of the principles or rules contained in this document have been violated may report the matter confidentially and anonymously through the following channels:

- Email: <u>mlara@territoria.cl</u>
- Complaints channel: http://denuncias.mut.cl/

## **Table of Contents**

- a. <u>Objective</u>
- b. <u>Scope</u>
- c. <u>Principles</u>
- d. Implementation
- e. <u>Complaints and claims</u>
- f. <u>Revision</u>
- g. Dissemination
- h. <u>Validity</u>

#### a. **Objective**

The Risk Management Policy (hereinafter indistinctly "the Policy") of Territoria (hereinafter "the Company") aims to establish the principles, basic elements, and general framework of the Company's risk management, in order to ensure proper governance of this process. In other words, the policy considers the identification, measurement, control, mitigation and monitoring of relevant risks that may adversely affect the Company's sustainability and the creation of value for its stakeholders.

### b. <u>Scope</u>

This Policy is of a corporate nature, therefore it is applicable to Territoria and all its assets, so it must be implemented and all its employees must be required to comply with it. The scope of this document covers all of the Company's activities; therefore, all employees are obliged to report any event that may constitute a violation of the principles or rules contained herein.

Likewise, the Company shall extend its obligations and compliance with this policy to suppliers, tenants, and construction companies, whatever their nature. Finally, Territoria will promote its compliance among the other interested parties, through the appropriate dissemination mechanisms.

### c. <u>Principles</u>

In general terms, a risk is an event generated by internal or external factors that, should it occur, adversely affects the Company's ability to successfully execute its strategies and achieve its objectives. Territoria has adopted the principles of effective risk management, in implementing and carrying out its activities. Therefore, it considers that Risk Management must:

- Create value and protect it, helping to achieve the Company's objectives and improve its performance.
- Be integrated into the Company's processes and be part of the responsibilities of the employees who work at the Company, whether they are internal or external.
- Be part of the decision-making process.
- Explicitly deal with uncertainty, analyzing those aspects of decision-making that are uncertain, the nature of such uncertainty, and how to resolve it.
- Be systematic, structured and timely, with the objective of contributing to efficiency and reliable results.
- Be based on the best available information from reliable sources.
- Align with the organization's context and risk profile.
- Take into account human and cultural factors that may facilitate or hinder the achievement of the Company's objectives.
- Be transparent and inclusive to ensure that risk management is open, visible, and accessible, and involves those responsible for the organization and its stakeholders.
- Be dynamic, iterative, and responsive to change, in order to detect and respond to changes in the organization and its environment.

- Facilitate continuous improvement of the organization, which should develop and implement strategies to continuously improve the risk management approach.

If the process is carried out following these basic principles, the results will be as follows:

- Improve the identification of opportunities and threats.
- Optimize the Company's management.
- Increase stakeholder confidence.
- Set a basis for decision-making.
- Improve auditing and follow-up and monitoring methods.
- Optimize incident prevention and management.
- Minimize losses associated with the processes.
- Promote organizational learning at all levels.

For the purposes of this Policy, stakeholders are understood to be all those who have a direct or indirect relationship to the business of Territoria , such as clients, employees, tenants, suppliers and contractors, other related companies or companies that have commercial relations with the Company, the financial community, trade organizations, the media, authorities, local communities, among others.

The effectiveness of this Policy and continuous improvement in this area are possible through the participation of all levels of the Company and the contribution of all employees, service and supply providers and interested parties. As such, all are required to adopt practices in accordance with the principles of this policy, considering that no situation or urgency can justify putting anyone's health or safety at risk.

#### i. Continuous and permanent risk management

There must be an optimal balance between strategy, growth, and profitability objectives, and the associated business risks, in order to maintain and increase the Company's value over time. In this context, Management is responsible for ensuring that relevant business risks are identified and mitigated to a level such that, should they materialize, their impact is manageable in order to ensure business continuity. The benefits of risk management include:

- Increases the possibility of achieving the company's objectives.
- Identifies and shares responsibility.
- Generates and strengthens focus on critical issues.
- Reduces surprises and crises in the organization.
- Provides information and transparency on the identified risks and decisions that have been taken.
- Helps make internal auditing more efficient.

The Company operates in an environment of changing circumstances, just like the risks to which these operations are exposed, which makes it necessary to manage these risks continuously and permanently, with a process approach, so the implementation of Risk Management must follow a series of steps to be effective and meet the objectives drawn at the outset. For details on the steps of this process, see Territoria 's Risk Management Methodology.

### ii. Risk management structure and responsibilities

The Company has an organizational structure capable of properly governing this process. The responsible parties and their respective obligations are as follows:

## **Executive Team or respective Committee**

- Approve the Integrated Risk Management Policy.
- Approve the Risk Appetite.
- Be informed and oversee the management and status of risks.
- Be aware of the information on risk management presented at least once a year by the Risk Table Corporate Leader.
- Promote a culture of risk management and continuous improvement in this area.

## **General Manager**

- Oversee corporate risk management.
- Participate in the Risk Committee of Territoria, and in reviewing the risk matrix.
- Allocate resources for adequate risk management, in order to ensure that the infrastructure, methodology, and personnel are in place.
- Promote a culture of risk management and continuous improvement in this area.

**Risk Committee:** This committee is comprised of the General Manager, CFO, Administration and Finance Manager, Innovation Manager and ESG Leader. The Risk Table Corporate Leader will also participate. The Committee has the following duties:

- Receive periodic reports on the management and status of all types of risks.
- Be aware of and take the actions it deems necessary in the event that a critical risk is identified without mitigation.
- Approve exceptions regarding risk management in situations that warrant it.
- Promote a culture of risk management and continuous improvement in this area.

### **Risk Owners**

- Propose accepted and tolerable thresholds for risk management.
- Monitor and evaluate emerging risks and the evolution of indicators for established risks. All of this must be done using a cross-cutting approach.
- Provide warning when any of the risk management indicators exceed acceptable and/or tolerable margins, and request action.

 Report and communicate to the Risk Committee the results of their monitoring and evaluation, including emerging risks and/or situations of concern regarding the risks under their responsibility.

## **Risk Table Corporate Leader**

The primary function of this role is to coordinate the risk management process of Territoria Duties include:

- Implement the risk management process to ensure the correct identification and registration of such risks, as well as associated mitigating actions, in the matrices of the different assets.
- Monitor risks and controls on a continuous and timely basis, in order to propose improvements if necessary.
- Report risks that materialize and/or exceed the limits in the defined thresholds, as well as those cases in which it does not have the resources to execute its responsibilities.
- Lead coordination across Territoria, such as the Risk Table, which meets periodically. This table is responsible for benchmarking and identifying synergies, which includes standardizing risk identification criteria and mitigation plans to replicate best practices from one asset to another; implementing improvements in risk assessment methodologies, sharing lessons learned from risk materialization and redefining mitigation plans and identifying new aspects of the process to be developed.
- Develop an annual risk management work plan, request its approval by the Risk Committee and submit the progress of its execution to the Risk Committee.
- Identify training and outreach needs for proper risk management and implement training programs to enable the risk management team to understand and apply their responsibilities in the process.

The Risk Table Leaders of each asset reports functionally to this position. They must apply the guidelines established by the corporate level in the development of their tasks.

### **Risk Table Leader of each asset**

- Advise the Process Owners on risk assessment and on the definition and documentation of mitigating actions, ensuring their periodic update.
- Perform a critical analysis of the asset's risk matrix, communicating the findings to those responsible and coordinating the modification of the matrix where appropriate.
- Record and follow up on the action plans defined to fill the risk mitigation gaps.
- Maintain updated information on the asset risk management process in the systems that have been defined for proper reporting to Senior Management.
- Support Process Owners in internal and external audits.
- Coordinate local instances to raise awareness and train the asset's personnel on risk management, in addition to the exchange of experiences based on the materialization of risks (lessons learned).

- Provide the asset management and Territoria 's management (through the Risk Table Corporate Leader) with relevant information on the status of risks at any stage of the process in a timely and periodic manner.

The implementation of this policy will be carried out gradually, considering the increasing complexity of the operations. Considering this, in a first stage the role of Risk Table Leader, both Corporate and Asset, may be performed by the same person.

## **Process Owners**

- Manage risks and controls under their purview, propose action plans in case of gaps, and document them in a risk matrix.
- Monitor and maintain risks within the thresholds defined in the Risk Appetite.
- Report situations related to risk management, emerging risks that may exceed the limits in the defined thresholds, and cases in which resources are not available to execute their responsibilities.
- Promote the participation of all members of their area in risk management, in accordance with the objectives and functions they perform.

### Independent evaluation of the Risk Management process

The Risk Committee shall define the opportunity in which an independent evaluation shall be carried out, for which purpose it may hire an external specialized consultant or appoint an internal resource, external to the process, with the following objectives:

- Evaluate the Comprehensive Risk Management Model (policies, procedures, matrices, among others) and communicate the findings to the corresponding governance bodies.
- Report on the effectiveness of compliance with the controls and action plans implemented by the Process Owners, as well as the improvement opportunities detected for risk management.
- Communicate to the Risk Management Process Managers the known risk events resulting from their audit analysis.
- Promote continuous improvement of risk management.

### iii. Risk Taxonomy of Territoria

The Company has identified the following risk categories:

- Strategic Risks: all risks that may significantly affect the achievement of the strategic objectives of the Territoria and the assets it operates.
- Financial Risk: this refers to the probability of an event occurring that has negative financial consequences for Territoria and the assets it operates.
- Operational Risk: these are risks related to the operation, either during construction or in the operating stage of the real estate assets. These may be the result of inadequate processes, non-compliance with regulatory obligations imposed for the operation of the centers, and other events

of external or internal causes, which may affect the quality of service to visitors, tenants, and lessees.

- Compliance Risk: risks involving non-compliance with a rule or standard, or breaches of relationships with public authorities. Therefore, compliance risk management requires identifying and knowing the laws and regulations applicable to each of the assets in operation or under construction.
- Cybersecurity: risks of cyber attacks, which can take many forms, from data theft and ransomware to system breaches, with potentially damaging consequences on a large scale and even service interruptions and/or security in the operation of assets.
- Governance: risk of incurring judicial or administrative sanctions, which may represent financial losses and/or reputational damage as a result of the inability to meet the expectations of visitors, tenants, lessees and other stakeholders.

Territoria has a standard corporate risk matrix applicable to each of its assets. The risk management teams of each asset shall assess these risks and implement the corresponding mitigating actions, following the guidelines provided in the Risk Management Methodology of Territoria

## d. Implementation

This document must be implemented in accordance with current legislation, national regulations and standards, as well as international standards and those of each country where an asset is located, as applicable. This includes all provisions related to current labor, environmental, non-discrimination, and inclusion regulations, among others.

In the event of a conflict between the principles and rules defined in this Policy and any of these regulations, the provisions of the latter shall always prevail.

The monitoring and control of compliance with the Policy shall be the responsibility of the responsible area.

The Manager in charge of the Policy will report on the progress of its implementation to the Executive Team or respective Committee on an annual basis, as well as any situations of non-compliance detected and the corrective measures adopted as a result.

Plans, procedures, and/or implementation or improvement actions shall be periodically disclosed by the Company to its stakeholders via appropriate channels.

### e. <u>Complaints and claims</u>

Anyone who believes that any of the principles or rules contained in this document have been violated may report the matter confidentially and anonymously through the following channels:

- Email: <u>mlara@territoria.cl</u>
- Complaints channel: http://denuncias.mut.cl/

Complaints will be heard by the Crime Prevention Officer, when appointed, who will implement the procedure established in the Company's Code of Ethics and Conduct, safeguarding the anonymity and confidentiality of the complainant, as well as the principles and rules of due process.

## f. <u>Revision</u>

The Policy will be revised periodically to ensure its suitability and effective implementation. All revisions shall be subject to approval by the Executive Team or respective Committee.

## g. Dissemination

The General Manager shall be responsible for taking all the measures he/she deems appropriate to make the Policy known and train the different stakeholders, with special concern for the Company's employees, tenants, suppliers, and their respective employees.

The content associated with this document must be disseminated in a way that is non-discriminatory and respectful of different cultures, without negatively affecting the most vulnerable groups, such as children, the elderly, and immigrants.

In addition, contracts and communications must be clear and simple, written in language as close as possible to that normally used by the people to whom the message is addressed; abide by statutory legislation, without using evasive or improper practices; be exhaustive and not omit any relevant elements that may affect decision-making. They must also be available on the Company's websites and establish mechanisms to respond to the needs of people with disabilities.

# h. <u>Validity</u>

This policy has been in force since it was approved and has not been modified to date.