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# HANDLING INFORMATION MANUAL

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**Tanner Stockbrokers S.A.**

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## **1. INTRODUCTION**

The Directory of Tanner Stockbrokers S.A. (hereinafter “Tanner”) has approved this manual. The latter was elaborated according to the established in the second part of the first paragraph of article 33 of Law N° 18.045 and in fulfillment with the Regulation of General Nature N° 278, dated January 19<sup>th</sup>, 2010, of the Chilean Securities and Insurance Supervisor.

The present Handling Information Manual (hereinafter “Manual”) delivers the regulations that govern the procedures, control mechanisms, and responsibilities that will be applied to Tanner and its personnel, regarding handling of the information they have obtained and also the acquisition decisions, alienation and acceptance or rejection of specific offers from our clients as of any other study, analysis, or other antecedent that may have an influence in the securities offer or demand in whose transaction we participate.

## **2. MANUAL ADMINISTRATION**

### **2.1. Field of Application**

This Manual applies to tanner and its personnel, including Tanner itself, its partners, directors, managers, main executives, agents, financial or investment consultants, money desk operators, official traders and general workers; and also all of those who work for the aforementioned regardless the quality, way or working or contractual modality.

### **2.2. Entity responsible for establishing the dispositions of the manual and its updates**

It will be Tanner’s General Management duty to establish the Manual’s regulations and its eventual modifications, updates, and interpretations that must be approved by the Tanner’s Directory. When interpretations and updates to the Manual are to be implemented, it will be the General Management the one in charge to carry them out with the support of the Comptroller Management and the approval of Tanner’s Directory.

### **2.3. Personal responsible for enforcing the contents of the manual**

It will be Tanner’s General Manager – personally or through those who he authorizes, the duty to enforce the contents of the Manual.

#### **2.4. Mechanisms to disclose and solve conflicts of interests**

In occasions, conflicts of interest may arise from the activities performed by Tanner and its personnel that must be properly channeled and solved. Regarding the spreading and resolution of such conflicts of interest, the people subject to the Manual shall inform the General Manager about any circumstance that interfere in any way the fulfillment of the Manual. If the affected turns out to be the General Manager him/herself, he/she must inform to Tanner's Directory about the possible conflict. Whenever there is doubt about the presence of a conflict, the people involved shall talk to the General Manager who will resolve by written if the present circumstance is or not a situation of conflict of interest. In every circumstance where the existence of a conflict is resolved, it will be the General Manager, or the Directory, the one who indicates the measures to be taken.

#### **2.5. Enforcement of sanctions or disciplinary measurements**

Any infraction to the obligations present in this Manual shall be considered a misconduct that may lead to disciplinary sanctions that, according to the severity of the case, can include the employee cessation of work, with no prejudice to the judicial actions that may apply.

#### **2.6. Spreading mechanisms of the regulations present in this manual**

A printed copy of the Manual shall be at disposal for the clients and general public in all the offices at Tanner. Additionally, the entire text of the Manual will be available in Tanner's website ([www.tanner.cl](http://www.tanner.cl)). It will be Tanner's General Manager responsibility, or of those who he authorizes, to spread the content of the Manual to all Tanner's personnel and any third party that may be affected.

### **3. CRITERIA AND PROCEDURES APPLICABLE TO INFORMATION SECURITY**

#### **3.1. Tanner as a trustworthy entity**

Tanner is trustworthy of its clients. The trust vested in Tanner results from the duty and need to respond to it in front of the clients, because this relationship is mutual. Tanner and its personnel have the obligation to carry themselves always according to the client's best interests, placing his/her interests in the first place.

A real trust relationship demands a transparent behavior in the interest conflict with the clients, for that matter, it is necessary to define the way they will be resolved.

### **3.2. Information regulated by the manual**

This Manual deals with handling information that Tanner and its personnel have gathered from the acquisition decisions, alienation and acceptance or rejection of specific offers from our clients as of any other study, analysis, or other antecedent that may have an influence in the securities offer or demand in whose transaction we participate.

### **3.3. Confidentiality and information security**

Tanner considers that the information controlled by the Manual assumes the quality of confidential information. In that regard, it must be absolutely discrete with its use, disclosing it only to those who – according to their institutional functions, need access to it. Such discretion implies that the information must never be disclosed to unauthorized people, not intentionally nor inadvertently, and necessarily involves a special concern about the custody of the documentation and information that everyone manage in the regular performance of their job. The personnel that participate in certain private activities must ensure that the confidential information they manage is not to be shared with people unauthorized to know such information. To protect the confidentiality of the information the minimum care will be the following:

- Issue, copy, send, file, store, and eliminate the information minimizing the risk of unauthorized people accessing it.
- Personnel shall not talk about it in public places, such as elevators, hallways, restaurants, bathrooms, and public transportation.
- Personnel shall not talk about it through cell phones and must be extremely careful when talking about it through telephones.
- Control access to storage areas, such as file rooms and warehouses.
- Personnel must keep the information on personal computers under strict control and with password.
- A proper level of security and privacy must be ensured in negotiation areas, whether they are offices or meeting rooms.

#### **4. PROHIBITIONS OR RESTRICTIONS THAT AFFECT TANNER AND ITS PERSONNEL**

Tanner and its personnel are subject of the following prohibitions or restrictions regarding confidential definition described in this Manual:

- Strict confidentiality must be kept regarding information and must not be disclosed to unauthorized third parties.
- Personnel must abstain from using it to any purpose not associated with the client's best interests. It cannot be used for personal benefit or that of a third party.
- Personnel must abstain from buying or selling for themselves or others, directly or indirectly, the securities that they have privileged or relevant information on, that is not of public knowledge, that may have influence in their quotation.
- Personnel must abstain from advise, in any way, the acquisition or alienation of securities where he/she has privileged or relevant information on, that is not of public knowledge, that may have influence in their quotation
- Tanner and its personnel must avoid that their personal interests get in conflict with the interests of their clients.