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ANTI-CORRUPTION POLICY

CODE: GA010015

VALIDATION ROUTE		
FUNCTION	POSITION	ORGANIZATIONAL UNIT
PREPARED BY:	COMPLIANCE OFFICER	GRUPO AGUAS COMPLIANCE
CONSENSUS:	COMPLIANCE MANAGEMENT SYSTEM CONSULTANT	GRUPO AGUAS COMPLIANCE
APPROVED BY:	BOARD OF DIRECTORS	BOARD OF DIRECTORS

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1. OBJECTIVE

Integrity is one of the fundamental principles that shall guide the conduct of all employees of Grupo Aguas (hereinafter, the “Company”). This principle is expressly established in the Code of Ethics, which disapproves of corruption in all its forms. Accordingly, the Company has implemented this **Anti-Corruption Policy**, the purpose of which is to give concrete effect to these principles and to serve as a guide for conduct of all employees of Grupo Aguas at every level. This Policy provides direction regarding what the Company expects and requires from their conduct, as well as the consequences in the event of non-compliance, when interacting with third parties, including business partners, the Company’s own employees, and, in particular, domestic or foreign public officials.

This Policy forms part of the Company’s Comprehensive Management, Compliance, and Anti-Corruption System, and is complementary to the Code of Ethics and other internal policies, especially the Criminal Offense Prevention Model of Grupo Aguas.

2. SCOPE

This Policy applies to all companies that form part of Grupo Aguas (Aguas Andinas S.A., Aguas Cordillera S.A., Aguas Manquehue S.A., Hidrogística S.A., Análisis Ambientales S.A., Ecoriles S.A., and Biogenera S.A.) and shall be observed by all individuals belonging to such companies, at all levels (directors and employees), whether acting in Chile or abroad. It shall also apply to any third parties acting on behalf of the Company, particularly those representing it before other third parties.

Additionally, this Policy applies to all subsidiaries, affiliates, and joint ventures in which any company of Grupo Aguas exercises control. In cases where the Company does not hold such control or has an equal participation with other partners, efforts shall be made to ensure the adoption and implementation of policies and measures aimed at preventing acts of corruption.

3. RELATED DOCUMENTS

The documents that complement and/or serve as references for this Policy are as follows:

- Code of Ethics
- Criminal Offense Prevention Model, Law No. 20.393
- Internal Rules on Order, Hygiene, and Safety
- Compliance Policy
- Donations and Sponsorship Policy
- Conflict of Interest Management Policy
- Human Rights Policy
- Criminal Prevention Policy
- Procedure for Reporting, Investigation, and Sanctions

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- Procedure for Interaction with Public Officials and Lobbying
- Procedure for Gifts, Invitations, and Travel
- Procedure for Managing Conflicts of Interest
- Donations Committee Procedure
- Comprehensive Risk Management Methodology of Grupo Aguas
- Annex: Application of the Corporate Risk Management Methodology to the Compliance Risk of Grupo Aguas
- Compliance Risk Matrix
- Guideline for Interaction with Public Officials
- Guideline for the Delivery of Social-use Gifts to the Local Community
- Guideline for Situations Involving Conflicts of Interest and Links to PEPs
- Anti-Corruption Management System Manual

4. DEFINITIONS

Audit: A systematic, independent, and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.

Courtesy Benefit or Attention: Refers exclusively to those items or services of low economic value that are customarily accepted as expressions of courtesy and good manners. This includes, for example, low-value corporate gifts such as *merchandising* items, or the offering of water, coffee, or access to sanitation facilities.

Undue Benefit: May consist of any type of consideration, whether direct or indirect, including items of economic value, cash or bank transfers, investments, engagement of third parties, or personal favors that benefit the recipient or any person related to them. Such items or benefits include, among others:

- Cash.
- Gifts.
- Invitations to entertainment activities.
- Meals.
- Travel expenses or financing of trips.
- Participation in business ventures.
- Job offers.
- Scholarships.
- Discounts on products, loans under favorable conditions, or payment of debts.
- Assistance or support to family members.

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- Contributions to political parties or campaigns.
- Personal or sexual favors or advantages.

Conflict of Interest: Any situation in which the personal or private interests of Employees may interfere with or prevail over the interests of the Company. Various circumstances may give rise to a conflict of interest, particularly when an Employee maintains a specific type of relationship that could motivate personal or private interests over those of Grupo Aguas while performing their duties. Such relationships may include, for example, family ties—especially those up to the third degree of consanguinity or affinity—, managerial relationships (such as administration, legal representation, or similar roles), or ownership interests (such as being a partner or significant shareholder) in a supplier, business partner, or customer of Grupo Aguas.

Cohecho: Es el delito consistente en la entrega, ofrecimiento o asentimiento en dar un beneficio indebido a un funcionario público nacional o extranjero, con la finalidad de conseguir de su parte una decisión, un acto o una omisión, o sólo en razón de su cargo, ya sea para obtener de él un beneficio futuro o como recompensa por un beneficio otorgado de forma previa.

Bribery (Criminal Offense): The criminal offense consists of giving, offering, or agreeing to give an undue benefit to a national or foreign public official for the purpose of obtaining from them a decision, act, or omission, or merely by reason of their position, whether to obtain a future advantage or as a reward for a benefit previously granted.

Corruption: The abuse of a position held within a public or private organization for the purpose of obtaining an advantage for oneself or others to which one is not entitled.

Private Corruption: The offense committed when an undue benefit is given, offered, or agreed to be given with the purpose of being favored in a private contracting process over another bidder. This offense is also committed when one accepts, receives, or agrees to receive such an undue benefit in exchange for favoring one bidder over others within a Company procurement process.

Due Diligence: A process for assessing the nature and extent of various risks, including the risk of bribery, in relation to transactions, mergers and acquisitions, projects, activities, business partners, and specific personnel, thereby enabling organizations to make sufficiently informed decisions.

Public Official: Any individual who performs functions within an entity providing a public service and dependent on public bodies, whether from the Central Administration, municipal, or autonomous institutions, regardless of whether they are appointed by law, election, or designation by a competent authority. By way of example and without limitation, public officials include ministers, undersecretaries, superintendents, regional governors, mayors, council members, municipal employees, members of parliament, judges, prosecutors, employees of various public agencies, and staff of state-owned enterprises, whether national or foreign.

Grupo Aguas: Aguas Andinas S.A., Aguas Cordillera S.A., Aguas Manquehue S.A., Biogenera S.A., Hidrográfica S.A., Ecoriles S.A., and Análisis Ambientales S.A., as well as any other company that may be incorporated in the future.

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Facilitation Payments: Payments made to public officials to expedite routine acts or administrative procedures, such as visa processing, permits, customs procedures, etc. Facilitation payments are illegal in Chile and are therefore prohibited under all circumstances and in all locations.

Bribery (Prohibited Conduct): Offering, promising, or giving an undue advantage or benefit of any kind—including economic—to a public official by reason of their position, or as an incentive or reward for performing or refraining from performing duties inherent to their role, for having performed or omitted such acts, for acting in breach of their duties, for influencing a third party in their functions, and/or for committing certain offenses.

In Chile, bribery of national or foreign public officials, as well as bribery involving private parties participating in a tendering or contracting process, constitutes a criminal offense punishable by imprisonment.

Socios comerciales: Cualquier persona u organización externa a la Empresa con la cual se tiene, o se planea establecer, alguna forma de relación comercial. Incluye clientes, proveedores, contratistas, consultores, subcontratistas, asesores, representantes e inversores.

Business Partners: Any person or organization external to the Company with whom a commercial relationship exists or is intended to be established. This includes clients, suppliers, contractors, consultants, subcontractors, advisors, representatives, and investors.

Third Parties: Individuals or organizations external and independent from the Company with whom interactions occur but who do not represent the Company.

Terceros representantes del Grupo Aguas: Conocidos como “TPR” por su sigla en inglés (*third party representative*), se trata de terceros que son externos a la Compañía, pero que interactúan con autoridades y otros terceros en representación de Grupo Aguas, entre los que se encuentran: proveedores, consultores, abogados, contratistas, y otros terceros que tengan la facultad de representar a la Empresa en cualquier gestión. Debido a que su intervención puede afectar directamente a la Empresa, también quedan obligados a respetar las políticas del Sistema Integral de Gestión, Compliance y Anticorrupción del Grupo Aguas.

Third-Party Representatives of Grupo Aguas: Known as “TPR” for their acronym in English (*Third-Party Representatives*), these are third parties external to the Company who interact with authorities and other third parties on behalf of Grupo Aguas, including suppliers, consultants, lawyers, contractors, and other third parties who have the authority to represent the Company in any matter. Since their actions may directly affect the Company, they are also required to comply with the policies of the Comprehensive Management, Compliance, and Anti-Corruption System of Grupo Aguas.

5. ANTI-CORRUPTION POLICY

5.1 Principles of Conduct

Grupo Aguas shares the widely held view that corruption constitutes a serious obstacle to the development of contemporary societies, undermines the rule of law, and poses a threat to the proper functioning of free markets. Corruption increases costs due to corrupt payments, distorts

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markets, and leads to lost opportunities. Furthermore, corruption is illegal, exposing companies to severe legal consequences and compromising their reputation before society.

For this reason, all forms of bribery and corruption are strictly prohibited within Grupo Aguas, whether involving a national or foreign public official or arising in the context of private commercial relationships. The following principles, while not exhaustive, are essential and mandatory:

- Always act with integrity in all business and operational relationships.
- Behave in accordance with the law, protocols, and all internal regulations.
- In case of doubt regarding a situation, do not act without first consulting.
- Report to the Compliance Officer or through the Company's Whistleblowing Channel any irregularity or suspicious situation of which you become aware.
- Disclose and update, whenever necessary, any personal interests, and refrain from participating in negotiations where a conflict of interest exists.
- Act with transparency, always abstaining from participating in activities or business that could be considered, even minimally, an act of corruption.
- Read and understand the policies that form part of the Company's Comprehensive Management, Compliance, and Anti-Corruption System.

In the same sense, it is strictly prohibited to:

- Offer, give, or agree to give undue benefits of any kind to national or foreign public officials. It is also prohibited to accept such benefits when they are offered or given with the intention of obtaining any decision in favor of the Company.
- Request gifts, advantages, or favors for oneself or for a third party from clients or suppliers with whom the Company maintains commercial relationships.
- In any case, give or offer gifts, favors, or services that—due to their economic value, exceptional nature, exclusivity, or any other circumstance—cannot be considered an act of courtesy.
- Engage in retaliation, discriminatory acts, or disciplinary measures against any employee who, in good faith, reported, raised concerns regarding, and/or disclosed potential breaches of internal regulations or applicable law, or for refusing to participate in a corrupt act, even where such refusal may result in a loss of business for the Company.

All the conducts described in the preceding paragraphs are absolutely prohibited and shall not be carried out even if:

- They could potentially benefit the Company.
- They could ensure the acquisition or retention of business.
- They could help achieve corporate or individual goals.
- They could facilitate or expedite any business, transaction, or operation of any kind.

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- They could improve the Company's position in accessing authorities or public officials in general.
- They are intended as a gesture of gratitude.
- They are ordered to an employee, executive, or third party by any employee or executive of the Company.

5.2 Roles and Responsibilities

5.2.1 Boards of Directors of Grupo Aguas Companies:

- Promote a culture of integrity and regulatory compliance within the companies of Grupo Aguas.
- Appoint the Compliance Officer.
- Ensure that the companies of Grupo Aguas have an independent and autonomous Compliance area with the necessary resources to perform its functions.
- Approve the Anti-Corruption Policy, as well as other policies that establish general conduct guidelines for the entire organization, such as the Code of Ethics and the Criminal Offense Prevention Model, including their respective updates.
- Ensure that the organization's strategy and the Compliance Management System are properly aligned.
- Receive, through the reports issued by the Compliance Officer, information regarding the performance of the Compliance Management System, including the policies and procedures that form part of it—such as the Criminal Offense Prevention Model and the Anti-Corruption Policy, among others.
- Propose improvements to the Compliance Management System and to the policies and procedures that form part of it.
- Ensure that the policies and procedures governing the Company's Whistleblowing Channel prohibit retaliation against persons who use such reporting mechanism in good faith.

5.2.2 Integrity and Compliance Committee

Por motivos de buen funcionamiento, el Grupo Aguas cuenta con un comité, cuya función principal es velar por la integridad y cumplimiento del Sistema de Gestión Compliance. Su denominación e integración es la siguiente:

For operational efficiency purposes, Grupo Aguas has a committee whose main function is to oversee the integrity and compliance of the Compliance Management System. Its designation and composition are as follows:

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Integrity and Compliance Committee of Grupo Aguas: This Committee is composed of the Chair of the Board of Directors, the Chief Executive Officer, and the Executive Committee—all from Aguas Andinas S.A.—as well as the Compliance Officer of Grupo Aguas. The Chief Executive Officers of the other companies may participate in the corresponding committee sessions when the matters to be addressed relate to the operations of their respective companies, or whenever their participation is required based on specific needs.

Without prejudice to the foregoing, in the event of any modification to the organizational structure of any company within Grupo Aguas, the Chief Executive Officer shall determine which executives will be part of the Committee.

The Committee shall meet at least semiannually, as long as its functions are required based on the Company's needs.

The Integrity and Compliance Committee, and each of its members within their respective areas of management, are responsible for monitoring the Compliance Management System. Accordingly, they shall:

- Ensure that the responsibilities and authorities contemplated in the Compliance Management System are properly communicated and understood at all levels within Grupo Aguas.
- Ensure that the Compliance Management System, along with the policies and procedures that form part of it, are duly defined, implemented, in force, and subject to ongoing review to address the risks present in the Company.
- Foster awareness within Grupo Aguas regarding the importance of the effective operation of the Compliance Management System and the attention that must be given to its requirements.
- Ensure that the Compliance Management System is properly designed to achieve its objectives.
- Encourage the promotion of a compliance culture within the organization.
- Promote the continuous improvement of the system.
- Be informed of the status of reports, investigations, and sanctions within the Company.
- Promote within the Company the development of the Compliance area's management, holding meetings at least semiannually to ensure the efficient implementation of the Compliance Policy.
- Ensure that the organization actively cooperates with the Compliance Officer in training activities and in any other tasks requiring interaction between the Compliance area and other areas of the Company.
- Guarantee respect for the autonomy and independence of the Compliance Officer to perform their duties efficiently.

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- Lead by example and encourage inquiries and improvements to the Compliance Management System.
- Recommend to the Compliance Officer any preventive or corrective measures regarding compliance risks.
- Ensure that the policies and procedures governing the Company's Whistleblowing Channel do not permit retaliation against persons who use such reporting mechanism in good faith.

5.2.3 General Management of Grupo Aguas Companies:

- Ensure that sufficient and appropriate resources are allocated for the effective operation of the Compliance Management System.
- Ensure that the requirements arising from the Compliance Management System are properly integrated into the Company's various processes.
- Promote a culture of integrity and compliance throughout the organization.
- Encourage the responsible use of the Whistleblowing Channel among the employees under their supervision.
- Authorize the corresponding operations in accordance with the procedures in force.
- Propose improvements and corrective measures to the Compliance Management System.

5.2.4 Compliance Function: Compliance Officer:

The Compliance Officer is the employee specially appointed by the Boards of Directors of Grupo Aguas as the person responsible for designing a comprehensive management system that enables the assessment and management of compliance-related conduct within the Company, in alignment with the corporate integrity framework established by Grupo Aguas. The Compliance Officer promotes the development of policies, procedures, and best practices in all areas where the efficient assessment of compliance risks so advises.

The Compliance Officer is also responsible for the Compliance Policy and its associated policies and procedures, serves as the Crime Prevention Officer (CPO) for the purposes of compliance with Law No. 20.393, and acts as the Ethics Officer of Grupo Aguas companies, developing standards to address the prevention of such risks.

The Compliance Officer, who reports directly to the Boards of Directors of Grupo Aguas, has adequate resources, competencies, and position, and shall be vested with authority and independence. The Compliance Officer shall have direct access to the Board of Directors and to the Integrity and Compliance Committee, both for periodic reporting and in the event of contingencies or issues that must be addressed at those levels.

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The role of Compliance Officer at Grupo Aguas shall be performed by the Compliance and Corporate Governance Manager.

The Compliance Officer shall be responsible for the following:

- Foster a culture of corporate integrity by proposing, when appropriate, the approval of new policies and the corresponding update or modification of existing ones.
- Supervise the design and implementation of the Compliance Management System.
- Train, advise, and guide employees on all matters related to this Compliance Policy.
- Continuously communicate to all employees of Grupo Aguas the policies and procedures that form part of the Compliance Management System, and, in particular, the obligations derived therefrom.
- Keep the Board of Directors and the Integrity and Compliance Committee informed of the operation of the Compliance Management System.
- Review and comment on the authorizations of operations requested by employees, in accordance with current policies and procedures, and grant such authorizations when applicable.
- Oversee, lead, investigate, and propose applicable sanctions in the event of reports or non-compliance, as described in the Procedure for Reporting, Investigation, and Sanctions and other internal regulations.
- Ensure that employees who report irregularities or non-compliance in good faith are not subject to retaliation.
- Ensure, together with the various departments and employees responsible for specific controls within the Compliance Management System, compliance with the Company's policies and procedures.
- Manage internal and external audits of the Compliance Management System.
- Establish the necessary channels to maintain permanent communication with the employees of Grupo Aguas who may have questions, comments, or concerns regarding the Compliance Management System.
- Report on the performance of the Anti-Corruption Management System to the aforementioned Board of Directors and Committees.

5.2.5 Employees of Grupo Aguas:

- Conduct themselves in alignment with the Compliance Policy and the policies and procedures that form part of it.
- Participate by openly and proactively communicating improvement actions within the scope of the Compliance area, encouraging co-workers to adopt the same cooperative and proactive attitude.

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- Take part in actions aimed at reducing risks, particularly in the training sessions scheduled for that purpose.
- Proactively facilitate the work of the Compliance Officer and the compliance function in general, granting access to meetings, documents, relevant information, follow-up sessions, and similar instances.
- Adhere to the Compliance Policy and comply with all obligations deriving therefrom.
- Report and promote the reporting of any acts that conflict with the Compliance Policy and the policies and procedures that form part of it.

5.3 Main Processes and Internal Policies or Procedures Governing Them

5.3.1 Interaction with Public Officials and Lobbying

In the course of its ordinary activities, Grupo Aguas maintains ongoing relationships with public administration bodies, state-owned enterprises, and various public officials. Within the framework of these interactions, the Company promotes transparency and expects its employees to act strictly within the limits established by internal regulations. Conflicts of interest and any conduct that could be interpreted as an attempt to obtain undue advantages—such as bribery or facilitation payments—must always be avoided.

In this regard, when interacting with a public official, employees must be familiar with and strictly comply with the following policies and procedures:

- Criminal Offense Prevention Model under Law No. 20.393, which regulates the criminal liability of legal entities.
- Procedure for Interaction with Public Officials and Lobbying, which describes the rules to be followed to schedule, authorize, conduct, and record communications and meetings with authorities, whether Law No. 20.730 regulating lobbying applies or not.
- Guideline for Interaction with Public Officials.
- Procedure for Gifts, Invitations, and Travel; and
- Procedure for Managing Conflicts of Interest.

5.3.2 Interaction with Third-Party Bidders or Offerors in Private Procurement Processes

In the course of its business activities, Grupo Aguas maintains ongoing relationships with private entities from which it requires products and services, or before which it may act as a bidder within a tendering process. Within the framework of these interactions, and in the same manner as with relationships involving public officials, the companies of Grupo Aguas promote transparency and expect their employees to act strictly within the limits established by national legislation and internal policies.

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In this regard, conflicts of interest and any conduct that could be interpreted as an attempt to obtain undue advantages must be avoided. Therefore, employees shall comply in particular with the following:

- Criminal Offense Prevention Model.
- Procedure for Managing Conflicts of Interest.
- Policies and Procedures Governing the Company's Procurement and Tendering Processes, which are mandatory for all employees.

5.3.3 Gifts, Invitations, and Travel

Although gifts, invitations, travel, and other benefits may contribute to strengthening business relationships with suppliers and other third parties, in some cases these practices may be perceived as an undue advantage and may constitute an ethical breach or an act of corruption.

Grupo Aguas allows its employees to receive gifts and invitations and to participate in trips only under the following circumstances:

- They must be reasonable: there must never be even the slightest doubt regarding the honesty, independence, or objectivity of either the giver or the recipient, which is related to the proportionality of what is received.
- They must be consistent with custom or usual practice: that is, given on special occasions, typically during year-end festivities or national holidays.
- Gifts or invitations must not be offered, given, or accepted when the giver or recipient is an authority—public or private—who is in a position to make a decision relevant to Grupo Aguas (for example, the award of a contract or a tender decision).
- In accordance with the foregoing, the Company establishes “blocking periods” near tendering processes, contracting processes, or major permit applications that must be granted by a public authority. Therefore, it is prohibited to receive, give, or promise to give any kind of gift or invitation during the following blocking periods:
 - (i) The three months prior to the start of a contracting process or to the beginning of the processing of any permit or authorization by a public authority.
 - (ii) Throughout the entire contracting process and/or the processing of a permit; and
 - (iii) The three months following the completion of a contracting process or the granting of a permit.
 - In the case of public positions filled through popular elections, this prohibition shall also extend throughout the official campaign period and the three months preceding it.

A “major permit” shall be understood as any authorization required for the commencement of works or projects of Grupo Aguas that are of significant value and exceptional in nature,

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excluding those granted by public authorities for the Company's routine activities, such as pavement-breaking permits.

- Value and frequency: gifts may never consist of cash, securities, or instruments representing such values, and must not exceed the value of two inflation-indexed units (Unidades de Fomento); otherwise, they must be declined.
- Intent of the parties: gifts or invitations must not be requested or offered with the intent to influence another's behavior and must be offered and received in good faith.
- Comfort and propriety: no gift or invitation should ever be offered or accepted if it could cause discomfort or embarrassment to either party. Under no circumstances may employees of Grupo Aguas directly or indirectly request gifts, invitations, or travel.

Finally, all gifts, invitations, or travel must comply with value limits and be duly authorized by the corresponding person, in accordance with the rules described in the Procedure for Gifts, Invitations, and Travel implemented by the Company, which is mandatory for all employees of Grupo Aguas.

Furthermore, any gift, invitation, or trip must comply with the following Grupo Aguas procedures and policies:

- Procedure for Gifts, Invitations, and Travel; and
- If it involves a public official, the Procedure for Interaction with Public Officials and Lobbying must be observed.

5.3.4 Donations and Sponsorships

In addition to providing a public utility service, Grupo Aguas recognizes the ethical values and corporate responsibility principles that guide its actions. Implicit within these principles is the Company's commitment to contribute to society as a whole—through various means—by promoting social, environmental, and cultural interests, as well as the sustainable and innovative development of its surroundings and local communities. However, unregulated contributions may have negative effects. Therefore, as a general policy, the granting of cash contributions, as well as any donation or collaboration intended to finance political or illegal activities, whether directly or indirectly, is strictly prohibited.

Accordingly, the Company has implemented the following policies, which must be observed by all employees of Grupo Aguas who may be involved in any situation concerning a donation, sponsorship, or social-use gift to the community:

- Donations and Sponsorship Policy.
- Donations Committee Procedure.
- Procedure for Managing Conflicts of Interest; and
- Guideline for the Delivery of Social-Use Gifts to the Local Community.

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5.3.5 Reporting, Investigation, and Sanctions

The Company has a confidential Whistleblowing Channel accessible to employees and external third parties of Grupo Aguas through Aquanet (intranet) and the corporate website. Any conduct contrary to this Policy may be reported through this channel, including anonymously.

Aguas Andinas strictly prohibits any form of retaliation or sanction against persons who use the Whistleblowing Channel in good faith.

Grupo Aguas has a Procedure for Reporting, Investigation, and Sanctions, which describes all processes and responsible parties involved in such matters.

5.3.6 Information Management

The Company's business information, as well as information generated during procurement and tendering processes, is particularly sensitive and must be handled with special care in relation to third parties, including family members and close friends of Grupo Aguas employees. This information must be treated with the required confidentiality and shall not be disclosed to anyone other than those expressly authorized to access it.

Any type of Company information may not be used for personal benefit or for the benefit of unauthorized third parties. Employees must respect the existing security measures in the Company's information systems and must comply with both physical and logical security regulations. Employees are required to carry out all information transfers through institutional communication channels, particularly the corporate email system.

5.3.7 Accounting Books and Records

The Company's books, records, and accounts shall accurately and faithfully reflect with reasonable detail, the transactions and dispositions of the Company's operations. The Company maintains an adequate system of internal accounting controls to ensure that transactions are authorized, executed, and recorded appropriately, as reflected in the Financial Statements, which are audited annually, both internally and externally.

5.3.8 Mergers and Acquisitions

Business acquisition or merger processes may impose liabilities on the Company for prior unlawful conduct or for improper acts committed after the merger or acquisition by third parties.

Therefore, mergers and acquisitions may only be carried out following the completion of due-diligence processes that allow for the detection of situations contrary to this Policy, and the success of the transaction shall be subject to such findings. For the purposes of this Policy, these processes shall be under the supervision of the Compliance Officer, who must grant prior approval before any merger or acquisition operation is carried out.

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5.3.9 Acting Through Third Parties

When hiring external third parties to interact on behalf of Grupo Aguas for activities covered by the Lobbying Law, a corresponding due-diligence process must first be carried out in each case.

The relationship shall be formalized through a service contract or another similar document. Such contract shall make reference to this Policy, the Compliance Policy, the Procedure for Interaction with Public Officials and Lobbying, and the Criminal Offense Prevention Model, and shall require the lobbyist's commitment to these documents.

Any breach of the provisions contained in these rules shall be deemed a material breach of the contractual obligations.

Likewise, suppliers, consultants, lawyers, and other third parties representing Grupo Aguas before public authorities shall be absolutely committed to acting at all times against bribery and corruption and in compliance with the provisions of the Code of Ethics, the Compliance Policy, the Procedure for Interaction with Public Officials, the Criminal Offense Prevention Model, and this Policy.

5.3.10 Personnel Hiring, Internal Mobility, and Incentives

Personnel recruitment processes are governed by the **Recruitment and Selection Policy and Procedure**. Within this process, information and background of applicants are collected to ensure full knowledge of the candidate's suitability for the position's requirements. Among other considerations, the Company shall ensure that candidates meet the highest ethical standards, particularly those aligned with the values informing this Policy. Additionally, employees must demonstrate their commitment to Grupo Aguas' corporate ethical culture through a clause in their employment contracts or a statement attached thereto and must disclose their current and potential conflicts of interest.

Variable remuneration received by employees is governed by the DEO Process and includes the necessary safeguards to prevent it from becoming an incentive for corrupt practices

5.3.11 Management of Conflicts of Interest

In the event of a potential conflict of interest, Aguas Andinas has implemented a Procedure for the Management of Conflicts of Interest which includes, among other matters, the duty of employees to report any potential conflict of interest, the obligation to abstain from participating in and making any decision regarding the matter in respect of which a conflict of interest has been declared, as well as the obligation to submit an annual declaration of conflicts of interest.

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5.3.12 Climate Change

The environment and climate change have been expressly considered as interested parties within the Company's Anti-Corruption Management System, given that Grupo Aguas considers climate change to be an emerging risk. This has resulted in the traceability of objectives, direct oversight by the Board of Directors in this area, and the integration of climate change mitigation and adaptation strategies across all operations, aimed at promoting sustainable management, ensuring full compliance with applicable regulations, and prohibiting any act of corruption intended to distort the aforementioned objectives.

Controls implemented to mitigate corruption risks associated with climate change are primarily linked to the proper manner of interacting with public officials in accordance with internal regulations, the timely and proper management of conflicts of interest, and the measurement of the effectiveness of controls associated with "offenses against the environment" established under Law No. 21,595 on Economic Crimes.

Accordingly, special compliance shall be required with the following:

- Procedure and Instruction on Interactions with Public Officials;
- Procedure for the Management of Conflicts of Interest;
- Criminal Offense Prevention Model;
- Criminal Risk Matrix.

6. IMPLEMENTATION

This Policy shall be implemented across all areas of each company forming part of Grupo Aguas. To this end, at least the following initiatives shall be adopted:

6.1 Risk Assessment and Management

Grupo Aguas has a Corporate Risk Management Methodology that defines the processes for assessing, treating, monitoring, and reviewing risks at the corporate level, as well as managing the controls that mitigate them. For risks associated with the Compliance Management System, this methodology includes an annex entitled "Application of the Corporate Risk Management Methodology to the Compliance Risk", which defines the process applied to the risks of engaging in corrupt practices.

The outcome of this management process is reflected in a Compliance Risk Matrix, which is reviewed and updated at least annually by the Compliance Officer, in order to incorporate changes experienced by the Company and its environment and to periodically evaluate the effectiveness and validity of the controls.

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6.2 Financial and Non-Financial Controls

The Company has implemented various controls in its internal processes that manage and record the financial transactions carried out within the Company.

Among other aspects, Grupo Aguas operates using the SAP system, where all transactions are recorded. Furthermore, a segregation of duties has been defined, meaning that the person requesting and the person approving a purchase or payment request must always be different individuals with the authority required by the system according to the amounts involved. Every authorization requires the submission of sufficient supporting documentation. Periodic internal and external audits are conducted to detect any anomalies.

These and other controls are described in the Policies and Procedures governing each process, such as the Procurement Policy and Procedure, Tendering Procedure, Investment and Expenditure Committee Procedure, Petty Cash, Expense Reimbursement, and Immediate Settlement Fund Procedure, and Accounts Payable Receipt and Recording Procedure, among others.

Non-financial controls refer to those that ensure adequate management of processes so that sufficient actions are implemented to reduce bribery risk in procurement, operational, and commercial matters.

Among the non-financial controls implemented by Grupo Aguas is the creation of the Supplier Manager position, which has enabled the classification of suppliers according to their criticality and, therefore, improved risk management. Additionally, the Company maintains a clear tendering and awarding process for all acquisitions exceeding certain thresholds; an Investment and Expenditure Committee must approve such awards, and all processes are recorded in digital systems that allow for traceability. Suppliers undergo due diligence processes and must sign commitments against bribery and corruption in all its forms.

Relationships with public officials must always be transparent and reported to management; employees should preferably attend such meetings accompanied by another colleague and keep a record of them. Access to internal information is limited to those who have authority or have been expressly authorized to review it.

Additionally, all contracts executed by companies within Grupo Aguas must receive prior approval from the Company's Legal Department.

These and other controls are described in the Policies and Procedures governing each process, such as this Anti-Corruption Policy, the Criminal Offense Prevention Model, the Code of Ethics, the Compliance Policy, the Procurement Policy and Procedure, the Tendering Procedure, the Investment and Expenditure Committee Procedure, the Procedure for Managing Conflicts of Interest, and the Supplier Master Administration Procedure, among others..

6.3 Dissemination and Training

The Anti-Corruption Policy shall be available on the websites of Grupo Aguas companies and on the document platform of the Integrated Management System.

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Internal communication is carried out through the Company's available channels, such as intranet (Aquanet), videos, emails, information bulletins, and others.

Annual training sessions shall be planned to provide sufficient knowledge to all Grupo Aguas employees on these matters, starting with those most exposed to bribery and corruption risks. The Compliance Officer and the Training Department shall maintain records and support documentation for each session.

Similarly, employees joining Grupo Aguas shall participate in an induction program containing basic knowledge about the Anti-Corruption Management System and other related matters, especially the Criminal Offense Prevention Model.

Training sessions may be conducted either in person or virtually. Regardless of the format, each training session shall include a knowledge test that must be passed. Each employee shall participate in training or refresher courses on these matters at least every three years or whenever changes to the Anti-Corruption Management System, so require.

The frequency and content of communications, as well as the scheduling of in-person or virtual training sessions, shall be established in an Annual Training and Communication Plan, prepared by the Compliance Officer in coordination with the Human Resources Department, and updated at least once a year.

7. REPORTING NON-COMPLIANCE

To ensure that everyone involved in any capacity with the Company maintains lawful and ethical conduct, a confidential Whistleblowing Channel has been made available to employees and external third parties of Grupo Aguas, accessible through Aquanet (intranet) and the corporate website, where they may report any activity—including suspected ones—that could constitute a violation of laws, the Company's Principles and Values, the Code of Ethics, the Criminal Offense Prevention Model, this Anti-Corruption Policy, or the related Procedures, as well as any cases of discrimination, inequitable treatment, or workplace and/or sexual harassment.

For further details, the Company has established a **Procedure for Reporting, Investigation, and Sanctions**, which specifically regulates the content required in a report, as well as the principles and stages of the investigation process. If a sanction is determined, the applicable measures shall be governed by said document and by the Internal Rules on Order, Hygiene, and Safety, the Code of Ethics, the Criminal Offense Prevention Model, and other internal policies and procedures.

In cases involving reports against suppliers or third parties, the corresponding sanctions shall be applied as appropriate, including, where applicable, the immediate termination of the contract. When the circumstances, so require, the relevant report shall be filed with the competent authorities.

Aguas Andinas strictly prohibits any form of retaliation or sanction against persons who use the Whistleblowing Channel in good faith.

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8. SANCTIONS

Failure to comply with this Policy—and, in particular, the commission of any of the prohibited acts described in the policies and procedures that form part of the Compliance Management System and the Anti-Corruption Policy—shall give rise to the sanctions established by law, in employment contracts, and in the Company's Internal Rules on Order, Hygiene, and Safety. Such sanctions may range from written warnings to the termination of the employment contract.

In the case of suppliers and third parties, sanctions may include written censure communicated to the supplier's management or the immediate termination of the contract in cases of serious violations.

The foregoing is without prejudice to any labor, civil, administrative, and/or criminal penalties that may apply to the offender.

9. MONITORING AND UPDATING

The Compliance Officer shall be responsible for ensuring compliance with this Policy and shall report directly to the Board of Directors and the Integrity and Compliance Committee on such compliance in periodic reports to senior management.

An internal communication channel has been made available on the intranet and via email (compliance@aguasandinas.cl) for all employees to raise and resolve questions regarding the application of this procedure.

The Anti-Corruption Policy and its procedures shall be reviewed and updated, whenever necessary, at least once per year.

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10. REVISION HISTORY

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VERSION No.	DATE	REMARKS
00	August 2017	Not Applicable
01	October 2017	Incorporates description of Compliance Officer duties.
02	August 2018	References to the Corporate Risk Management Methodology and Annex: Application of the Corporate Risk Management Methodology to Grupo Aguas' Compliance Risk incorporated in Sections 3 and 6.1.
03	August 2019	Amendments in Section 5.1.1 related to the current regulation on bribery of public officials. Reference to new regulations on interactions with third-party bidders or offerors incorporated in Section 5.3.3.
04	May 2020	Formal and organizational adjustments, as reported in the Board of Directors' meetings held in February and May 2020.
05	November 2020	ESSAL S.A. removed from Grupo Aguas and other formal adjustments.
06	May 2021	"Grupo Aguas" replaced by "Grupo Andinas".
07	May 2022	Corporate name changed from Gestión y Servicios S.A. to Hidrogística S.A.
08	May 2023	No changes.
09	May 2024	"Grupo Andinas" replaced by "Grupo Aguas". Corporate name changed from Aguas del Maipo S.A. to Biogenera S.A.
10	June 2025	Document reviewed; no changes.
11	April 2026	Adjustments made to the Policy in consideration of the requirements of the ISO 37001:2025 Standard. Amendments were introduced incorporating aspects related to climate change, management of conflicts of interest, the prohibition of retaliation in connection with reports made in good faith, sanctions for non-compliance, and other formal modifications.