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**ENVIRONMENTAL COMPLIANCE POLICY**  
**CODE: GA010028**

VALIDATION ROUTE		
FUNCTION	POSITION	ORGANIZATIONAL UNIT
PREPARED BY:	COMPLIANCE OFFICER	COMPLIANCE - GRUPO AGUAS
CONSENSUS:	DEPUTY MANAGER OF SAFETY, OCCUPATIONAL HEALTH AND ENVIRONMENT  DEPUTY MANAGER OF SUSTAINABILITY	OPERATIONS MANAGEMENT  STRATEGY AND CORPORATE AFFAIRS MANAGEMENT
APPROVED BY:	BOARD OF DIRECTORS	BOARD OF DIRECTORS

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## 1. OBJECTIVES

For Grupo Aguas, Compliance is much more than adherence to rules and standards. Compliance entails the creation of a culture of integrity and corporate ethics that guides the behavior and decision-making of all employees within our organization, where the protection of natural resources forms an essential part of the functions we perform daily.

In this regard, Grupo Aguas has adopted this Environmental Compliance Policy, which establishes a set of principles that must be respected by all those who perform duties within the Company—particularly senior management—as well as the allocation of roles and responsibilities, the relevant legal standards on the matter, risk management, procedures for reporting breaches of the stated policies, and their consequences.

This Environmental Compliance Policy aims to provide guidelines for all Company employees regarding how environmental protection must be managed. To this end, the Policy describes the criminal, administrative, and regulatory legal standards, as well as those arising from environmental assessment processes that the Company has chosen to initiate and which are compiled in its environmental qualification resolutions, the behaviors derived from them, and the duties they create for all members of Grupo Aguas. This Policy also considers the Company's voluntary efforts concerning environmental risk management, particularly those related to the acquisition and maintenance of ISO Standard No. 14.001.

## 2. PRINCIPLES

The fundamental principles that guide the behavior of Grupo Aguas employees in environmental matters are the protection of the environment, acting in accordance with laws and internal regulations, and the continuous improvement of the environmental management system.

The commitment to protecting the environment is not limited to preventing environmental impacts or pollution but also includes protecting the natural environment and mitigating and adapting to climate change. Therefore, it is the obligation of everyone who is part of the Group to follow and respect this Policy.

## 3. SCOPE

This Environmental Compliance 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 must be observed by all persons who are part of said companies, at all levels (directors and employees), whether acting in Chile or abroad.

Additionally, it applies to all companies, subsidiaries, and associations in which any company of Grupo Aguas holds control. In cases where the company lacks such control or holds equal participation with other partners, it must encourage the adoption and implementation of policies and measures that contribute to establishing systems of compliance, control, and supervision.

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#### 4. RELATED DOCUMENTS TO THE ENVIRONMENTAL COMPLIANCE POLICY

- Code of Ethics
- Compliance Policy
- Anti-Corruption Management System Manual
- Corporate Risk Management Methodology
- Annex: Application of the Corporate Risk Management Methodology to Grupo Aguas' Compliance Risk
- Criminal Offense Prevention Model
- Reporting, Investigation and Sanctions Procedure
- Integrated Management Policy
- Methodology for the Identification and Evaluation of Environmental Aspects
- Hazardous Waste Management Procedure
- Integrated Rapid Action Guide
- Incident and Emergency Management Plan
- Hazardous Substances Management Procedure
- Plant Operation Manual

#### 5. DEFINITIONS

**Human Dignity:** Right of every human being to be respected and valued as an individual and social being, with their own characteristics and particular conditions, solely by virtue of being a person.

**Environmental Compliance Officer:** Person responsible for managing the implementation of and resolving any questions related to the Environmental Compliance Policy.

**Grupo Aguas:** Aguas Andinas S.A., Aguas Cordillera S.A., Aguas Manquehue S.A., Biogenera S.A., Hidrogestica S.A., Ecoriles S.A., and Análisis Ambientales S.A.

**Law No. 19.300:** Law on General Environmental Framework.

**Law No. 20.393:** Law that establishes the Criminal Liability of Legal Entities for the offenses indicated therein, including bribery, money laundering, terrorism financing, handling of stolen goods, private-to-private corruption, willful mismanagement, conflict of interest, misappropriation, and damage to hydrobiological resources.

**Natural Environment:** The global system composed of natural and artificial elements of a physical, chemical, biological, or sociocultural nature and their interactions, permanently altered by human or natural actions, which governs and conditions the existence and development of life in multiple forms.

**Hydrobiological Resources:** Hydrobiological species that can be exploited by humans and that have water as their normal or most frequent habitat. This includes species such as aquatic plants, algae, fish, mollusks, among others.

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**Natural Resources:** Any material obtained from the planet Earth, such as surface or groundwater and oceans; minerals (silver, iron, coal); energy resources (oil and coal); rocks (clays for ceramics, phosphates, quartz sand, limestone, aggregates); as well as biotic resources subject to exploitation such as livestock, fish, and forests; and, in general, any component that can be used by human beings to satisfy their spiritual, cultural, social, or economic needs or interests.

**Environmental Qualification Resolution (RCA):** Final administrative act of the environmental impact assessment procedure issued by the respective Environmental Evaluation Commission, which environmentally qualifies a project or activity, establishing the environmental conditions and requirements to be met during its execution.

**Supreme Decree No. 90/2001, Ministry General Secretariat of the Presidency:** Regulation governing pollutants associated with liquid waste discharges into surface water bodies.

**Supreme Decree No. 46/2003, Ministry General Secretariat of the Presidency:** Regulation governing liquid waste discharges into groundwater.

**Supreme Decree No. 609/98, Ministry of Public Works:** Regulation governing liquid waste discharges into sewer systems.

**Supreme Decree No. 148/2004, Ministry of Health:** Regulation governing the management, storage, transportation, and disposal of hazardous waste.

**Supreme Decree No. 1119/2005, Ministry of Public Works:** Regulation governing sanitation concessions for the production and distribution of drinking water and the collection and disposal of wastewater.

**Supreme Decree No. 4/2009, Ministry General Secretariat of the Presidency:** Regulation governing the management of sludge generated at wastewater treatment plants.

**Supreme Decree No. 43/2015, Ministry of Health:** Regulation governing the management and storage of hazardous substances.

**Supreme Decree No. 160/2008, Ministry of Economy, Development and Reconstruction:** Regulation governing the facilities and operations related to the production and refining of liquid fuels, as well as their transportation, storage, distribution, and supply.

**Supreme Decree No. 38/2012, Ministry of the Environment:** Regulation governing noise emissions generated by the indicated sources.

**Supreme Decree No. 1/2013, Ministry of the Environment:** Regulation approving the Pollutant Release and Transfer Register (RETC).

**Chilean Official Standard No. 409:** Technical standard establishing the physical, chemical, radioactive, and bacteriological requirements that drinking water must meet.

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**Third Parties:** Persons or entities external and independent from the Company.

## 6. ENVIRONMENTAL PROTECTION POLICY

### 6.1 Promotion of a Circular Economy

The companies that are part of Grupo Aguas have, for many years, shared a culture of commitment to the respect for human dignity, the fight against corruption, and the conservation of the environment. To fulfill this purpose, Grupo Aguas has promoted a circular economy across all its production processes, which involves the reduction, recycling, and reuse of waste, as well as the responsible use of natural resources that are part of operations—particularly water, both that which is received for treatment at the Company's plants and that which is returned to natural watercourses. The objective of fostering operations under a circular economy approach has always been to protect biodiversity and reduce the impact of our activities.

In this sense, respect for human beings and the environment is part of the identity and values of the Group.

Within this value framework, this Environmental Protection Policy is established. Through it, Grupo Aguas seeks to better understand the main risks that its operations pose to the basic components of the environment (water, soil, air), as well as which of its operations are more likely to affect them. This Policy takes into consideration the efforts already made by the Company in this area, reflected in the existence of a Circular Economy Management Department and in the certification obtained by its two main wastewater treatment plants in compliance with the international standard described under ISO Standard No. 14.001.

This Policy also considers the risk assessments and controls carried out by Grupo Aguas through its Criminal Offense Prevention Model, which includes, among others, the criminal offenses established in Articles 139, 139 bis, and 139 ter related to damage to hydrobiological resources.

### 6.2 Principles and Main Processes of the Environmental Policy

At Grupo Aguas, we recognize the importance of developing and promoting among our employees a culture aimed at minimizing environmental impacts throughout the life cycle of our processes—beyond mere regulatory compliance. For the Company, the integrity and well-being of persons are core values, inherently linked to the care and protection of the environment.

For this reason, Grupo Aguas seeks to prevent behaviors that may harm or endanger the environment or affect the health of persons, animals, or the environment in which they live.

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The conduct of Grupo Aguas' employees shall be guided by the following principles:

### 6.2.1 Principle of Environmental Responsibility

All employees are responsible for improving and protecting the environment. Accordingly, it is prohibited to:

- Improperly use natural resources or their derivatives, such as water, electricity, paper, etc.
- Fail to observe existing protocols intended to prevent air, soil, or water pollution.
- Fail to comply with legal and technical standards for the control of hazardous substances.

### 6.2.2 Precautionary Principle

It is always better to prevent than to remedy ecological disasters. Therefore, employees are required to:

- Comply with the rules indicated by Plant Managers and Risk Prevention Officers.
- Follow all documents containing instructions related to environmental matters, risk prevention, contingencies, and action plans or measures to be adopted in case of eventuality.
- Report any spill or potential pollutant emission.
- Use hazardous substances properly and with the corresponding protective measures.
- Manage hazardous waste in accordance with established rules and protocols.
- Keep environmental management systems duly updated to reflect legal changes or changing circumstances.

### 6.2.3 Principle of Sustainability

Grupo Aguas plans and carries out its activities considering the proportional use of environmental resources. Therefore, the Group's employees are required to:

- Use natural resources efficiently.
- Implement and propose the necessary measures to avoid the unnecessary consumption of resources.
- Limit the use of resources such as electricity, water, and heating to the amount strictly necessary.

### 6.2.4 Principle of Cooperation and Participation:

The protection of the environment is a responsibility shared by all. Accordingly, Grupo Aguas' employees shall promote the following:

- Properly informing the community about the activities or projects developed in their environment.



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- Establishing mechanisms that allow the community to express its observations and/or concerns regarding potential environmental risks arising from the Company's operations.

### 6.2.5 Management of Hazardous Substances

The proper operation of Grupo Aguas' facilities and infrastructure, including its drinking water treatment plants ("DWTP") and wastewater treatment plants ("WWTP"), requires the use of hazardous substances. The careless storage, transport, transfer, warehousing, or use of these substances may cause significant environmental damage through explosions, leaks, or spills. To manage them appropriately, the Company developed the Hazardous Substances Management Procedure, which lists these substances and establishes mechanisms for their prudent and careful use; compliance with these guidelines is mandatory for all employees.

The storage and handling of hazardous substances are also covered under certain Environmental Qualification Resolutions (RCA) of the DWTP and WWTP. In such cases, Grupo Aguas' employees are required to comply with those provisions, whose purpose is precisely to prevent environmental impacts and risks arising from the storage and handling of hazardous substances.

Hazardous substances are further subject to sector-specific regulations that require Grupo Aguas to take specific and mandatory actions in this regard. In particular, Supreme Decree No. 43/2015 of the Ministry of Health, which approves the Regulation on the Storage of Hazardous Substances, establishes that all Grupo Aguas facilities with the capacity to store 10 tons of flammable hazardous substances or 30 tons of other types of hazardous substances must obtain sanitation authorization. In the case of gas storage in cylinders, a sanitation authorization is required when the storage area exceeds 30 m<sup>2</sup>. This Regulation also contains a series of obligations to be fulfilled regarding the storage and handling of hazardous substances.

With respect to liquid fuels, these are governed by Supreme Decree No. 160/2008 of the Ministry of Economy, Development and Reconstruction, which sets forth the safety and handling conditions for liquid fuel storage that the Company must comply with.

Without prejudice to internal control measures and the aforementioned regulations, all Grupo Aguas employees are required to handle hazardous substances and their containers with due care. This obligation includes ensuring that containment measures established to prevent spills remain within the appropriate technical and safety standards. Dikes and other physical structures designed to prevent the spillage of such substances shall be subject to inspections, and it shall be the duty of the Environmental Compliance Officer to conduct the necessary audits to verify compliance with these control measures.

Proper management and the existence of containment systems to prevent spills of hazardous substances are particularly important at all Grupo Aguas facilities located near natural watercourses that host aquatic flora and fauna. Contamination of these waters causing damage to hydrobiological resources may increase the risk of committing the criminal offense of water contamination, as described and regulated in our Criminal Offense Prevention Model. For this reason, it is strictly prohibited to discharge any hazardous substance into a natural watercourse that hosts aquatic biota. All Grupo Aguas employees must comply with the procedures established in the Integrated Rapid Action Guide in the event of spills.

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### 6.2.6 Management of Hazardous Waste

Grupo Aguas' operations generate hazardous waste. The handling and storage of such waste are subject to various regulations—both general, applicable to all storage sites, and specific to certain facilities.

Indeed, the management of hazardous waste is governed by sector-specific regulations that require Grupo Aguas to take concrete and mandatory actions in this regard. In particular, Supreme Decree No. 148/2003 of the Ministry of Health establishes that all Grupo Aguas facilities generating more than 12 kg of acute toxic waste or 12 tons of hazardous waste must have a Hazardous Waste Management Plan submitted to the sanitation authority. Likewise, every site for the storage, transport, or disposal of hazardous waste must obtain a sanitation authorization. This regulation also sets forth several obligations concerning the handling and storage of such waste, as well as the requirement to comply with the Hazardous Waste Declaration and Tracking System.

Furthermore, many facilities that generate hazardous waste have Environmental Qualification Resolutions (RCA) that establish specific obligations for their management. The controls and commitments described in those RCAs must be followed, as these controls themselves prevent contamination risks that may arise from improper management of hazardous waste. In this regard, Grupo Aguas' employees must comply with the conditions and measures set forth in the corresponding RCA when managing hazardous waste.

Additionally, Grupo Aguas has enacted the Hazardous Waste Management Procedure, which lists the hazardous wastes currently subject to control measures. This procedure also specifies duties related to the identification, segregation, storage, removal, and final disposal of such waste. All Grupo Aguas employees are required to follow these guidelines to ensure that the handling of hazardous waste generated by the Company's operations does not pose a risk to the environment.

Preventing spills of hazardous waste during the execution of the aforementioned processes is particularly important at all Grupo Aguas facilities located near natural watercourses that host aquatic biota, as contamination of such waters resulting in damage to hydrobiological resources may increase the risk of committing the criminal offense of water contamination, as described and regulated in our Criminal Offense Prevention Model. For this reason, it is strictly prohibited to discharge any hazardous waste into a natural watercourse that hosts aquatic biota. All Grupo Aguas employees must comply with the procedures established in the Integrated Rapid Action Guide in the event of spills.

### 6.2.7 Compliance with Regulatory Obligations of the Environmental and Sanitation Management System

Grupo Aguas' operations that may affect the environment are regulated and supervised primarily by two public agencies: the Superintendence of the Environment (SMA) and the Superintendence of Sanitation Services (SISS).

The SISS is the public agency responsible for supervising sanitation service providers and liquid waste transported through sanitation service networks. The SMA, in turn, is responsible for implementing, organizing, and coordinating the oversight of environmental management instruments, as well as for imposing sanctions in cases of non-compliance. Since some of Grupo

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Aguas' operations have been submitted to the Environmental Impact Assessment System (SEIA) and have obtained an Environmental Qualification Resolution (RCA) that allows them to operate and must also comply with emission and environmental quality standards, these authorities hold concurrent jurisdiction over the Company. This requires an internal coordination mechanism to ensure timely responses to the reporting duties required by both institutions.

Failure to comply with the sectoral regulations under the SISS or with environmental obligations established by the various environmental management instruments under the SMA's jurisdiction may cause significant economic and reputational damage to Grupo Aguas, making it necessary to establish preventive control mechanisms.

This Policy focuses its efforts on providing the essential guidelines to ensure compliance with the obligations subject to oversight by the SMA and the SISS, recognizing that the proper management of obligations arising from the environmental aspects of sanitation service provision is a key control mechanism for environmental risks. The environmental management duties of every entity regulated by the SMA and SISS include:

- Carrying out operations in a manner that does not affect the basic components of the environment (surface water, groundwater, air, soil and subsoil, cultural heritage, and human environment).
- Ensuring that operations do not generate emissions that may affect environmental components. Regulations prohibit the discharge of hazardous substances or waste into water or soil, the emission of pollutants into the air, and, in general, exceeding the maximum limits established by environmental regulations regarding emissions and discharges into watercourses and the atmosphere.
- Ensuring proper management of operations to prevent and/or control the generation of unpleasant odors.
- Submitting operations that may cause environmental impacts to the required environmental assessments, depending on the level of impact.
- Fully complying with environmental management instruments (RCA, Prevention and Decontamination Plans, environmental quality standards, and emission standards).
- Notifying the authorities of any operational modifications, when applicable.
- Fully complying with reporting and information obligations arising from environmental management instruments and other applicable environmental regulations.
- Responding fully to the authorities in charge of environmental management in the event of supervisory or inspection proceedings.

To ensure compliance with these obligations, Aguas Andinas has Sustainability and Environmental Departments responsible for managing environmental compliance. The duties of these departments include:

- Coordinating the processing of environmental permits (EIA, DIA, and pertinence reviews).
- Conducting environmental monitoring and reporting to the SISS and SMA.
- Controlling odor emissions, primarily from WWTP.

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- Coordinating the voluntary environmental management system resulting from ISO 14.001 certification.
- Monitoring the handling of hazardous substances.
- Monitoring the management of hazardous waste

These activities ensure compliance with several obligations established by applicable regulations. To fully meet these obligations, these departments must maintain constant coordination with the operational areas of Aguas Andinas. All employees responsible for Aguas Andinas' operations have received guidelines issued by this management area, intended to ensure operational compliance with environmental regulations. One of the most important guidelines concerns the proper communication that must exist between operational and environmental management areas to generate, in a timely manner, the information required by the authorities—either through reporting obligations or during inspection processes.

It is the Company's objective that Grupo Aguas progressively replicate this same control structure, particularly in companies operating under RCA regulations.

#### **6.2.8 Water Contamination and Damage to Hydrobiological Resources**

Grupo Aguas' operations are not exempt from the risk of contaminating watercourses that host hydrobiological resources. The importance of preventing contaminant discharges into watercourses was reinforced on January 31, 2019, following the publication of Law No. 21.132, which amended the Fisheries and Aquaculture Law by introducing the criminal offense of damage to hydrobiological resources through the contamination of water bodies (explained in detail below). This offense was also incorporated among those for which legal entities may be held liable. Consequently, this type of conduct may result in the imposition of penalties on the companies that are part of Grupo Aguas, including disqualification from obtaining state concessions for a determined or indefinite period, or even the dissolution of the company responsible for the offense.

For this reason, this Policy must be closely linked to the Criminal Offense Prevention Model of Grupo Aguas, which includes control measures related to this new criminal offense. It is the obligation of all Grupo Aguas employees to refrain from contaminating surface or groundwater bodies located near our operations, especially those that host flora and fauna. Likewise, given the existence of specific controls designed to prevent the commission of the aforementioned offense, all Grupo Aguas employees are required to implement the controls established in this area under the Criminal Offense Prevention Model, which have been disseminated as part of the communication and awareness-raising activities associated with that management tool.

#### **6.2.9 Emission Control**

The operation of Aguas Andinas may generate emissions into the environment that could have a negative impact. The main emissions generated by Grupo Aguas are discharges into water bodies, specifically liquid waste from its WWTPs (wastewater treatment plants) and sludge generated in its DWTPs (drinking water treatment plants).

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With regard to liquid waste discharges from WWTPs, these are regulated by Supreme Decree No. 90/2001 of the Ministry General Secretariat of the Presidency, in cases where the discharge is made into surface water bodies—which applies to most of Grupo Aguas’ operations—as well as by the RCAs in cases where the plant has obtained environmental authorization.

As for sludge discharges from DWTPs into watercourses, although Supreme Decree No. 90/2001 could, in principle, apply, there is currently no clarity regarding its enforcement. Obligations concerning these discharges have only been established in certain RCAs.

Noise emissions are regulated by Supreme Decree No. 38/2012 of the Ministry of the Environment. Under this regulation, Grupo Aguas’ operations must comply with the maximum emission limits established therein.

To manage these contamination risks, Grupo Aguas has developed a series of procedures designed to assess the existence of pollutant emissions and has implemented control measures accordingly. As previously noted, some of these measures involve the mitigation or compensation of emissions declared as environmental impacts during environmental assessment processes and incorporated as obligations under the RCAs, which are therefore subject to SMA oversight.

Additionally, the operation of WWTPs has a significant impact in terms of unpleasant odor emissions into the atmosphere, which neighboring communities have historically perceived as one of the main negative effects of these facilities. For this reason, compliance with emission control measures is essential to maintain good relationships with the communities surrounding WWTPs.

For all the foregoing, Grupo Aguas regularly conducts training sessions for its employees on these matters and maintains communication processes between its operational areas and those responsible for environmental management, with the objective of ensuring that the Company’s internal procedures for emission management are properly implemented—both as part of the environmental assessment processes to which it is subject and in relation to its other operations. Through these processes, Grupo Aguas seeks to ensure that its operations consistently remain within the standards described above.

## 7. ROLES AND RESPONSIBILITIES

### 7.1 Board of Directors

The Boards of Directors of the Grupo Aguas Companies shall:

- Promote a culture of respect for and protection of the environment within the Grupo Aguas companies.
- Appoint the Environmental Compliance Officer(s).
- Ensure that the Grupo Aguas companies progressively have Environmental Compliance Officer(s) with the autonomy and resources necessary to perform their duties.

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- Approve the Environmental Compliance Policy. This duty also extends to any subsequent revisions to which it must be submitted.
- Receive, through the semi-annual reports of the Environmental Compliance Officer(s), information regarding the performance of the Environmental Compliance Policy, its reports, and recommendations.
- Propose improvement initiatives to the Environmental Compliance Policy.

## 7.2 Operations Management

- Promote, together with the Environmental Compliance Officer, a culture of respect for the environment within the organization.
- Review, upon presentation by the Environmental Compliance Officer, the Grupo Aguas environmental risk matrix, and designate those responsible within each business unit, company, or department for managing the controls and action plans described therein.
- Review, jointly with the Environmental Compliance Officer, the environmental compliance audits periodically conducted by the Company's Audit Department or by external advisors and define the action plans to be implemented in the event that significant gaps are identified.
- Authorize the necessary operations to implement the controls arising from the Grupo Aguas environmental risk matrix, in accordance with applicable procedures.
- Continuously update and evaluate the Environmental Compliance Policy.
- Ensure the joint fulfillment of objectives for all ISO and similar certifications.
- In those Grupo Aguas companies that lack this department, transfer best practices to the most relevant area within that company and to the corresponding Compliance Officer.

## 7.3 Environmental Compliance Officer

The Environmental Compliance Officer shall be responsible for ensuring compliance with and monitoring the Environmental Compliance Policy, as well as for proposing improvements and updates to Environmental Management. This function may be performed by a single individual or by a team of persons who shall act as Environmental Compliance Officers.

The Environmental Compliance Officer(s) shall be responsible for environmental management within Grupo Aguas for the purpose of reporting on their duties and shall coordinate with the Compliance Department of each Company to align the various preventive strategies of the organization. The Environmental Compliance Officer(s) shall have the necessary resources, competencies, and standing, and shall be vested with authority and independence. They shall have direct and immediate access to the Board of Directors and the corresponding Integrity and Compliance Committee, both for monitoring reports and in the event of contingencies or matters that require their attention at those levels.



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The Environmental Compliance Officer's duties shall include:

- Promoting a culture of environmental compliance by proposing, when appropriate, the approval of new policies and the corresponding updates or modifications to existing ones.
- Supervising the implementation of the Environmental Compliance Policy.
- Training, advising, and guiding employees in all matters related to the Environmental Compliance Policy.
- Coordinating, together with operational areas, the control measures implemented by the various environmental management mechanisms. This role shall include overseeing compliance with obligations arising from Decontamination Plans, Environmental Qualification Resolutions (RCA), the ISO 14.001 Certification Management System, and the Criminal Offense Prevention Model, insofar as it refers to the criminal offense of damage to hydrobiological resources.
- Keeping the Board of Directors and the Integrity and Compliance Committee informed regarding the implementation and results of the Environmental Compliance Policy.
- Reviewing, directing, investigating, and proposing applicable sanctions in cases of reports or non-compliance with the Environmental Compliance Policy, in accordance with the Reporting, Investigation and Sanctions Procedure and other internal regulations.
- Ensuring that employees who report irregularities or non-compliance in good faith are not subject to retaliation.
- Auditing, through Grupo Aguas' Internal Audit Department and external third parties, on a permanent basis, compliance with the controls, obligations, and other relevant aspects of the Environmental Compliance Policy.
- Establishing the necessary channels to maintain ongoing communication with Grupo Aguas employees who may have questions, comments, or concerns regarding the Environmental Compliance Policy.

#### 7.4 Sustainability and Environmental Departments

The Company has departments responsible for the environmental management system, based on the various environmental management instruments issued by the authorities to regulate its operations. These departments shall work in coordination with the Environmental Compliance Officer, who has been assigned several of the control measures set out in this Policy. Their role as part of the preventive tasks related to environmental matters is therefore of great importance. These departments have the following responsibilities:

In the area of sustainability:

- Ensure the proper processing of environmental permits and the submission of all new projects to the Environmental Impact Assessment System (SEIA), when applicable.
- Maintain regular and formal communication with Plant Managers to be informed of any proposed changes to a project, such as new constructions or expansions.

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- Manage and oversee the compensatory plans arising from projects.

In environmental matters:

- Assume the role of Environmental Compliance Officer.
- Manage the monitoring of the environmental compliance risk matrix and supervise, together with those responsible for control processes, compliance with the mitigating action plans and the maintenance of controls.
- Coordinate the drafting of the protocols necessary to ensure environmental protection and care in operations, where such protocols have not yet been developed.
- Ensure compliance with the Company's internal protocols on environmental matters, including the requirements of ISO Standard 14.001.
- Ensure the proper handling of hazardous substances and hazardous waste derived from operational processes.

## 7.5 Quality Department

This department is responsible for managing controls related to the sanitation obligations of Grupo Aguas (mainly those of Aguas Andinas S.A.). This position is assigned several controls related to compliance with regulations subject to supervision by the Superintendence of Sanitation Services (SISS), as well as some related to inspections conducted by the Superintendence of the Environment (SMA). For this reason, this role is also of great importance in managing the controls arising from this Policy. The duties of the Quality Department include:

- Ensuring the existence of the necessary controls to guarantee the quality of the water produced, distributed, and treated.
- Reporting directly to the Environmental Compliance Officer any events or contingencies that may affect water quality.
- Proposing measures to improve environmental management in relation to water quality.

## 7.6 Compliance Officer

In addition to the duties established in the Compliance Policy and other related documents, in environmental matters its role shall be to provide subsidiary support to the management carried out by the Environmental Compliance Officer, as well as to promote this Policy in cases where the position is held by different persons.

## 8. IMPLEMENTATION

### 8.1 Risk Assessment and Management

Grupo Aguas has a Corporate Risk Management Methodology that defines the processes for evaluating, treating, monitoring, and reviewing risks at the corporate level, as well as the management of the controls that mitigate them. For risks associated with the Compliance



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Management System, this methodology includes an Annex that defines the process applied to the risks of engaging in corrupt conduct.

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

It is essential that the Company has the necessary processes to comply with an adequate environmental policy, which necessarily involves conducting an initial risk assessment and continuous monitoring to identify and track the risks to which it is exposed, as well as defining the necessary controls to mitigate them and continuously improving the existing ones. These risks must be identified in each operational phase, and their scope must be assessed, considering at least the environmental aspects, legal requirements, and other matters related to the operational impact, with the purpose of preventing or reducing undesirable effects.

For these purposes, applying the Compliance Risk Management Methodology, an Environmental Risk Matrix shall be developed, summarizing the risks identified, the existing controls, and the action plans to be implemented, where necessary. This approach enables the evaluation of environmental risks to be aligned with the same matrices used for managing other compliance risks, allowing environmental compliance risks to be managed in the same manner as the other compliance risks already overseen by the Compliance Officer.

The specific objectives of Risk Management in environmental compliance matters are as follows:

- Identify and analyze the various risk factors involving potential threats that could affect Grupo Aguas' environmental responsibility.
- Determine the effectiveness of existing controls or mitigators and propose the necessary action plans when improvement opportunities are identified.
- Conduct an effective risk assessment.
- Identify the need to manage risk scenarios by providing criteria to justify resource allocation and assigning the appropriate controls to those responsible for high-risk processes.
- Provide reliable and timely information to senior management for decision-making purposes.

Risk management also entails maintaining appropriate policies and procedures to control environmental risks, as well as the ongoing updating and evaluation of their performance through training, awareness programs, and both internal and external audits.

## 8.2 Regulations Related to Environmental Compliance

Para los efectos de realizar una correcta evaluación de riesgos, resulta muy importante seleccionar las normativas que servirán de estándar de comportamiento correcto, y de ese modo, como criterio para determinar zonas de riesgo en la operación. Sin embargo, a diferencia de otras

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materias normativas, la protección legal y regulatoria del medioambiente es profusa y disgregada. Por ello, a continuación listamos las principales normativas que se considerarán para la evaluación de riesgos, y las obligaciones que imponen:

- Obligación de caracterizar e informar todos los residuos líquidos, indicando las concentraciones máximas de contaminantes en las descargas de residuos líquidos a aguas superficiales y marinas para las fuentes emisoras (Decreto N°90/2001 del Ministerio Secretaría General de la Presidencia).
- Obligación de caracterizar e informar todos sus residuos líquidos en las descargas efectuadas a aguas subterráneas (Decreto N°46/2003 del Ministerio Secretaría General de la Presidencia)
- Obligación de caracterizar e informar los residuos líquidos en las descargas efectuadas a sistemas de alcantarillado (Decreto N°609/1998 del Ministerio de Obras Públicas)
- Prohibición de descarga aguas servidas o RILES en cuerpos de aguas sin la debida depuración (Código Sanitario).
- Obligación de cumplir con límites de niveles de emisión de ruido (Decreto N°38/2012 del Ministerio del Medio Ambiente).
- Obligación de obtener autorización para manejo, almacenamiento, transporte y destinación de residuos peligrosos (Decreto N°148/2004 del Ministerio de Salud que Aprueba Reglamento Sanitario sobre Manejo de Residuos Peligrosos).
- Obligación de obtener autorización sanitaria para el almacenamiento de sustancias peligrosas dentro de la instalación (Decreto N°43/2016 del Ministerio de Salud, que establece el Reglamento de Almacenamiento de Sustancias Peligrosas).
- Obligaciones referentes al manejo de lodos generados en Plantas de Tratamiento de Aguas Servidas (Decreto N°4/2009 del Ministerio Secretaría General de la Presidencia).
- Obligación de ingresar al Sistema de Evaluación de Impacto Ambiental (SEIA) los proyectos, así como sus modificaciones (Ley N°19.300).
- Obligación de remitir información a la autoridad relativa a emisiones y residuos en los casos designados por la ley (Decreto Supremo N°1/2013 del Ministerio del Medio Ambiente, que aprueba el Registro de Emisiones y Transferencias de Contaminantes ("RETC").
- Deber de remitir información respecto de emisiones al agua (Resolución N°117/2013 del Ministerio del Medio Ambiente, que dicta e instruye normas de carácter general sobre procedimiento de caracterización, medición y control de residuos industriales líquidos).
- Deber de remitir información por los titulares de RCA (Resolución N°1518/2014 del Ministerio del Medio Ambiente y sus modificaciones).
- Obligación de dar cumplimiento a la RCA (Ley N°20.417/2012 del Ministerio Secretaría General de la Presidencia).
- Obligación de colaborar en las fiscalizaciones ambientales (Ley 20.417).

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### 8.3 Regulations Related to Criminal Liability

As indicated above, the operations carried out by Grupo Aguas also involve a criminal dimension, which may entail liability both for the company itself and for those directly involved in the commission of an offense. Therefore, special attention must be paid to the following obligations:

- Do not introduce polluting agents into water bodies that may affect hydrobiological resources, under penalty of imprisonment and fines (Article 136 of the General Law on Fisheries and Aquaculture, in relation to Article 1 of Law No. 20.393 on the Criminal Liability of Legal Entities).
- Do not spread substances that, by their nature, may endanger animal or plant health, or the population's water supply (Article 291 of the Criminal Code).
- Do not poison or contaminate food, water, or other beverages intended for public consumption (Article 315 of the Criminal Code).

## 9. DISSEMINATION AND TRAINING

The Environmental Compliance Policy shall be made available to all personnel through Aquanet, the official website of the Grupo Aguas companies, as well as through the document platform of the Integrated Management System.

Internal communication shall be carried out through the Company's available channels, such as the intranet (Aquanet), videos, emails, informational bulletins, and other means.

Annual training sessions shall be planned to provide all Grupo Aguas employees with sufficient knowledge on these matters, starting with those whose roles entail higher exposure to the identified risks. The Compliance Officer shall maintain the records and support documentation for each training session.

Similarly, employees who join Grupo Aguas must participate in an induction program that includes basic knowledge of the Environmental Compliance Policy.

Training sessions may be conducted either in person or virtually. Regardless of the format, all training activities shall include a knowledge assessment that must be successfully completed.

## 10. CONTINUAL IMPROVEMENT

The organization shall continuously improve the effectiveness and efficiency of the Environmental Compliance Policy through the monitoring of its objectives. To this end, audits of the controls established in the Environmental Risk Matrix shall be conducted at least once a year.

The results of these audits shall be analyzed and reviewed by the Boards of Directors of the Grupo Aguas companies and by the Integrity and Compliance Committee, who shall subsequently determine the adequacy of the plans proposed by the Environmental Compliance Officer.

The Environmental Compliance Officer, together with the Circular Economy Management, shall ensure the ongoing update of this Policy and the joint fulfillment of objectives for all ISO certifications and similar standards.

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## 11. REPORTING NON-COMPLIANCE

Any employee who witnesses a breach of the provisions established in this Policy may report it through the Grupo Aguas Whistleblowing Channel, available on Aquanet and on the Company's website, or by directly contacting the Environmental Compliance Officer.

## 12. SANCTIONS

### 12.1 Internal Sanctions

Failure to comply with this Policy shall result in the sanctions provided for by law, employment contracts, and the Company's Internal Rules on Order, Hygiene and Safety, which may range from written warnings to termination of employment.

In the case of suppliers and third parties, sanctions may consist of a written reprimand communicated to the supplier's management or the immediate termination of the contract with the supplier in the event of serious violations.

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

### 12.2 Sanctions for Regulatory Non-Compliance

Sanctions associated with the breach of the obligations detailed herein may be of various kinds.

On the one hand, there are sanctions related to the violation of sector-specific obligations, which may lead to administrative sanctioning procedures by the competent authorities, such as the Superintendence of the Environment (SMA) or the Superintendence of Sanitation Services (SISS).

In the case of sanctioning procedures conducted by the SMA, penalties may include warnings, fines ranging from 1,000 to 10,000 Annual Tax Units (UTA), temporary or permanent closure of the facility, or even the revocation of the Environmental Qualification Resolution (RCA).

In addition, the SMA may impose measures on the Company to safeguard the environment and prevent damage.

For its part, the SISS may impose sanctions consisting of fines or the closure of the facilities where the infraction is verified.

If the non-compliance falls within the criminal sphere—such as discharges or emissions that pollute watercourses and cause damage to hydrobiological resources or to animal or human health—penalties for the Company may include accessory sanctions such as confiscation, fines payable to the Treasury, loss of tax benefits, prohibition from entering into acts or contracts with the State, or even the dissolution of the legal entity.

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Likewise, individuals may be subject to prison sentences of up to 10 years, in addition to the imposition of fines.

### 13. MONITORING AND REVISION

The Environmental Compliance Officer shall be responsible for ensuring compliance with this Policy and shall report at least semi-annually to the Board of Directors and the Integrity and Compliance Committee as part of their periodic reports to senior management.

An internal communication channel is available on the intranet and via email ([compliance@aguasandinas.cl](mailto:compliance@aguasandinas.cl)) for all employees to raise and resolve questions regarding the application of this procedure.

The Environmental Compliance Policy shall be reviewed and updated, if necessary, at least once a year.

### 14. REVISION HISTORY

REVISION HISTORY		
VERSION No.	DATE	REMARKS
00	November 2019	No applicable.
01	May 2021	Reviewed and updated.
02	May 2022	The corporate name Gestión y Servicios S.A. was replaced with Hidrogística S.A.
03	May 2023	No changes.
04	May 2024	The name Grupo Andinas was replaced with Grupo Aguas. The corporate name Aguas del Maipo S.A. was replaced with Biogenera S.A.
05	June 2025	Document reviewed; no changes.