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COMPLIANCE POLICY
CODE: GA010016

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. OBJECTIVES

For Grupo Aguas, Compliance goes beyond adherence to rules and standards. Compliance entails building a culture of integrity and corporate ethics that guides the conduct and decision-making of all employees within our organization, shaping the Company’s approach to its guidelines and strategic objectives in relation to all stakeholders.

Along these lines, Grupo Aguas has implemented changes to its organizational chart and processes to frame all actions within an ethical structure defined by certain fundamental principles—particularly those set out in the Code of Ethics.

The Compliance area forms part of the “Business Model” pillar of Grupo Aguas’s strategy and, under the parameters and guidelines of Senior Management, leads a management system aimed at promoting change through the implementation of best practices wherever feasible and advisable, based on efficient risk management.

The fundamental objective of the Compliance Management System is to establish an organizational approach that reflects, structurally and operationally, the content of the processes, policies, and procedures comprising this Compliance Policy, serving as a practical and mandatory guide for all employees of Grupo Aguas.

In this way, we actively involve all employees of Grupo Aguas in our management system in an inclusive manner, with the aim of committing them to the Company’s defined compliance standards.

2. COMPLIANCE MANAGEMENT SYSTEM

The Compliance Management System comprises a set of processes, policies, procedures, and organizational management practices aimed at implementing best practices that ensure adherence to the principles of ethics and integrity promoted by Grupo Aguas and that enable the reduction of risks of acts that may constitute breaches in these matters. To this end the Company has developed this Compliance Policy, which contains the essential elements of the Compliance Management System to be communicated to employees, as well as other documents that govern Grupo Aguas’s culture of integrity and corporate ethics.

This document describes the Compliance Management System, establishing its scope, responsibilities, resource management, implementation and communication measures, review, and continuous improvement, among other aspects.

3. PRINCIPLES

The principles that guide the conduct of Grupo Aguas employees correspond to the four core principles established in the Code of Ethics: (1) Act in accordance with the law and internal

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regulations, (2) Embed a culture of integrity, (3) Demonstrate loyalty and honesty, (4) Respect all people.

Integrity, likewise, is a fundamental principle that must guide the conduct of Grupo Aguas employees. As set out in the Code of Ethics, corruption in any form is disapproved. At Grupo Aguas we share the widely held view that corruption constitutes a serious obstacle to the development of societies, undermines the rule of law, and threatens the proper functioning of free markets. Corruption increases costs due to corrupt payments, distorts markets, and generates lost opportunities. Additionally, corruption is illegal, exposing companies to serious legal consequences and compromising their reputation in society in the event of breaches.

Within the Company’s guidelines and principles is respect for market operating rules, prohibiting any conduct that restricts free competition. Grupo Aguas categorically rejects all unfair competition practices that breach applicable laws and our internal regulations.

Regarding the environment, its preservation and sustainable development are of particular importance for Grupo Aguas, as declared in our strategic vision, which proposes being Chile’s benchmark for sustainability, ensuring water for future generations.

At Grupo Aguas, there has long been a culture of commitment to Human Rights, integrating processes, policies, and procedures that reject and sanction all forms of discrimination, harassment (workplace and sexual), and inequitable situations, while promoting actions in favor of equality, inclusion, and work–life balance. As a Group, we promote a culture of compliance across the Company to help ensure that integrity and respect for human rights are part of the conduct of all employees at every organizational level. In this regard, Grupo Aguas has implemented a Human Rights Policy that aims to give effect to these principles and serve as a guide for conduct within the Company and across its value chain.

Our mission is to give effect to these basic principles in coordination with all Company bodies and to serve as a guide for the conduct of Grupo Aguas employees, orienting them regarding what the Company expects and requires of their conduct.

4. COMMITMENT

Our Compliance Management System is comprehensively designed to promote and reinforce compliance conduct. The elements of this system foster a culture of compliance throughout the Company and help ensure that integrity forms part of the conduct of all employees of Grupo Aguas. In this sense, the commitment of Senior Management to meeting the pursued purposes and objectives is essential.

Accordingly, this Compliance Policy evidences our organizational commitment to laying the foundations for an efficient and continuously improving management system that engages the entire organization in building a culture of integrity and respect for the high ethical standards promoted by Grupo Aguas.

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As a sign of Senior Management’s commitment to managing a culture of integrity within the Company and its necessary implementation, this document has been approved by the Boards of Directors of all Grupo Aguas companies and will be mandatory for the entire organization.

Additionally, and in relation to the managerial and supervisory duties proposed by the Compliance Management System, this policy provides for periodic monitoring by Senior Management of the management of these matters through presentations by the Compliance Officer to the Boards of Directors of Grupo Aguas and to the Integrity and Compliance Committee, which meets at least semiannually.

Grupo Aguas’s commitment also extends to all its suppliers, contractors, and subcontractors, urging them to meet the ethical standards promoted by the Company.

5. SCOPE

This Compliance Policy applies to all companies that comprise 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 those companies at all levels (directors and employees), operating in Chile or abroad. It also applies to other third parties acting on behalf of the Company.

Additionally, it applies to all companies, subsidiaries, and associations in which any Grupo Aguas company has control. In cases where the Company lacks such control or has equal participation with other partners, efforts must be made to adopt and implement policies and measures that contribute to establishing compliance, control, and oversight systems.

6. RELATED DOCUMENTS

The documents that complement and/or serve as references for this policy include, among others:

- Grupo Aguas Code of Ethics
- Criminal Offense Prevention Model under Law No. 20,393
- Anti-Corruption Policy and Associated Procedures
 - o The procedures associated with the Anti-Corruption Policy are as follows:
 - Procedure for Reporting, Investigation, and Sanctions
 - Procedure for Interaction with Public Officials and Lobbying
 - Procedure for Gifts, Invitations, and Travel
 - Procedure for Managing Conflicts of Interest
 - Donations Committee Procedure
 - Corporate Risk Management Methodology

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- Annex: Application of the Corporate Risk Management Methodology to the Compliance Risk at Grupo Aguas
 - Instruction on Interactions with Public Officials
 - Instruction on the delivery of socially customary gifts to the local community
 - Instruction for situations involving conflicts of interest and PEP links
 - Anti-Corruption Management System Manual
- Donations and Sponsorships Policy
 - Human Rights Policy
 - Conflict of Interest Management Policy
 - Criminal Offense Prevention Policy
 - Internal Rules of Order, Hygiene and Safety.

7. REPORTS, INVESTIGATION, AND SANCTIONS

Grupo Aguas has a confidential Whistleblowing Channel accessible to employees, suppliers, and external third parties of Grupo Aguas both through Aquanet (intranet) and through the corporate website. Reports received through that channel (or by other suitable means, such as in person before the Compliance Officer or via telephone, email, or written report) will be investigated pursuant to the Procedure for Reporting, Investigation, and Sanctions. If the imposition of any sanction is determined, the provisions of that document and of the Company's Internal Rules of Order, Hygiene and Safety and other applicable internal policies and procedures will apply. In the case of suppliers and third parties, the corresponding sanctions will apply in each case, potentially including immediate contract termination. When warranted by the facts, the respective report will be filed with the competent authorities.

Grupo Aguas has a Procedure for Reporting, Investigation, and Sanctions founded on the following fundamental principles: (i) expeditiousness, (ii) confidentiality, (iii) responsibility, (iv) effectiveness, and (v) non-retaliation. This procedure describes in detail the rights and duties of all participants in investigative processes, the different forms of closure, and the managerial roles the Compliance Officer will have in these processes.

8. ROLES AND RESPONSIBILITIES

8.1 Boards of Directors of Grupo Aguas Companies

The Boards of Directors of Grupo Aguas companies are responsible for:

- Promoting a culture of integrity and regulatory compliance within Grupo Aguas companies.
- Appointing the Compliance Officer.
- Ensuring that Grupo Aguas companies have an independent, autonomous Compliance area with the resources necessary to perform its functions.

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- Approving the Compliance Policy as well as other policies establishing general conduct guidelines for the entire organization, such as the Code of Ethics and the Criminal Offense Prevention Model, and their updates.
- Ensuring that the organization’s strategy and the Compliance Management System are properly aligned.
- Receiving, through the Compliance Officer’s reports, information on the performance of the Compliance Management System, including the policies and procedures comprising it, such as the Criminal Offense Prevention Model and the Anti-Corruption Policy, among others.
- Proposing improvements to the Compliance Management System and to the policies and procedures comprising it.

8.2 Integrity and Compliance Committee

For proper functioning, Grupo Aguas has a committee whose main function is to ensure the integrity and compliance of the Compliance Management System. Its name and composition are as follows:

Integrity and Compliance Committee of Aguas Andinas S.A., Aguas Cordillera S.A., Aguas Manquehue S.A., Ecoriles S.A., Hidrogística S.A., Análisis Ambientales S.A., and Biogenera S.A.: composed of the Chair of the Board, the Chief Executive Officer, the Management Committee of Aguas Andinas S.A., and Grupo Aguas’s Compliance Officer. The chief executives of the other companies may participate in the respective committee session to the extent the matters addressed relate to that company’s operations or as required in view of their needs.

Without prejudice to the composition defined above, if there is a change in the organizational structure of any Grupo Aguas company, the Chief Executive Officer must define which executives will be part of it.

The committee will meet at least semiannually, insofar as its functions are required considering the Company’s needs.

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

- Ensure that the responsibilities and authorities set forth in the Compliance Management System are adequately known at all levels within Grupo Aguas.
- Ensure that the Compliance Management System and the policies and procedures comprising it are properly defined, implemented, in force, and subject to ongoing review to address the risks present in the Company.
- Encourage awareness within Grupo Aguas regarding the importance of the effective in-force operation of the Compliance Management System and the attention that must be given to its requirements.

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- Ensure that the Compliance Management System is properly designed to achieve its objectives.
- Encourage the promotion of a culture of compliance within the organization.
- Strive for continuous improvement of the system.
- Be informed of the status of the Company's reports, investigations, and sanctions.
- Promote within the Company the development of the Compliance area's management, meeting at least semiannually to ensure the efficient development of the Compliance Policy.
- Ensure that the organization actively cooperates with the Compliance Officer in training activities and in all tasks where the Compliance area must interact with other areas of the Company.
- Guarantee respect for the Compliance Officer's autonomy and independence to carry out their duties efficiently.
- Lead by example and encourage queries and corrections to the Compliance Management System.
- Suggest preventive or corrective compliance risk measures to the Compliance Officer.

8.3 Chief Executive Officer of Grupo Aguas Companies

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

8.4 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 to evaluate and manage compliance conduct within the Company, linked to the corporate integrity structure defined by Grupo Aguas, promoting the development of policies, procedures, and best practices wherever the efficient assessment of compliance risks so advises.

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They are, in turn, the manager and person responsible for the Compliance Policy and its associated policies and procedures; the Crime Prevention Officer (“EPD”) for purposes of Law No. 20,393; and the Ethics Officer of Grupo Aguas companies, developing standards that enable the prevention of these risks.

The Compliance Officer, who reports directly to the Boards of Directors of Grupo Aguas, has suitable resources, competencies, and position, and will be vested with authority and independence. They will have expedited access to the Board and the Integrity and Compliance Committee both for monitoring reports and in the event of contingencies or matters that must be addressed at those levels.

Their functions include:

- Fostering a culture of corporate integrity, proposing, where appropriate, the approval of new policies and the corresponding updates or amendments to existing ones.
- Overseeing the design and implementation of the Compliance Management System.
- Training, advising, and guiding employees on all matters pertaining to this Compliance Policy.
- Permanently communicating to all Grupo Aguas employees, the policies and procedures comprising the Compliance Management System, and particularly the obligations arising therefrom.
- Keeping the Board and the Integrity and Compliance Committee informed about the functioning of the Compliance Management System.
- Making observations regarding authorizations of employee operations in accordance with the policies and procedures in force, as well as granting authorization where appropriate.
- Knowing, directing, investigating, and proposing applicable sanctions in the event of reports and breaches, as described in the Procedure for Reporting, Investigation, and Sanctions and other internal regulations.
- Ensuring that employees who, in good faith, report irregularities and breaches are not subject to retaliation.
- Together with the various bodies and employees responsible for specific controls within the Compliance Management System, ensuring compliance with the policies and procedures of the Company¹.
- Managing internal and external audits of the Compliance Management System.

¹ In particular, with respect to the following policies and procedures: Code of Ethics; Criminal Offense Prevention Model under Law No. 20,393; Donations and Sponsorships Policy; Human Rights Policy; Anti-Corruption Policy; Procedure for Interaction with Public Officials and Lobbying; Procedure for Gifts, Invitations, and Travel; Procedure for Managing Conflicts of Interest; Anti-Corruption Management System Manual; Procedure for Reporting, Investigation, and Sanctions; Donations Committee Procedure.

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- Opening the necessary channels to maintain ongoing communication with Grupo Aguas employees who have questions, observations, and proposals regarding the Compliance Management System.

8.5 Employees of Grupo Aguas

- Observe conduct aligned with the Compliance Policy and the policies and procedures comprising it.
- Participate — communicating openly and fluidly — in improvement actions within the remit of the Compliance area, encouraging co-workers to adopt the same cooperative and proactive attitude.
- Take part in actions determined to reduce risks, particularly the scheduled training activities.
- Proactively facilitate the work of the Compliance Officer and the compliance function in general, allowing access to meetings, documents, relevant information, follow-up meetings, etc.
- Adhere to the Compliance Policy and comply with what derives from it.
- Report—and encourage reporting of—facts that conflict with the Compliance Policy and the policies and procedures comprising it.

9. RISK 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 controls that mitigate them. For risks associated with the Compliance Management System, this methodology includes an Annex titled “Application of the Corporate Risk Management Methodology to the Compliance Risk,” which defines the process applied to the risk of breaches of the Policies and Procedures comprising that System.

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

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

- Identify and analyze different risk factors involving potential threats that could affect Grupo Aguas’s corporate ethics structure.
- Determine the effectiveness of existing controls or mitigators.
- Conduct an effective risk assessment.
- Identify the need to manage risk scenarios, providing criteria to justify the allocation of resources.

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- Provide reliable and timely information to Senior Management for decision-making.

Based on the identified risks, Grupo Aguas uses the following strategies to incorporate preventive measures into its daily activities:

- Internal Policies and Internal Procedures. These documents guide employees in applying the principles of conduct defined by Grupo Aguas. By setting clear standards and rules, our policies help employees meet their job responsibilities in accordance with applicable legislation and internal regulations and thereby prevent potential breaches of the law.
- Ongoing training and dissemination.
- Auditing and continuous improvement.
- Periodic review of the risk matrix, policies, and procedures.

10. DISSEMINATION AND TRAINING

This Compliance Policy will be available on the websites of Grupo Aguas companies and on the Integrated Management System's document platform.

Internal communication is carried out using the Company's channels, such as the intranet (Aquanet), videos, emails, information sheets, among others.

Training activities will be planned annually to provide sufficient knowledge on these matters to all Grupo Aguas employees, beginning with personnel with greater exposure to identified risks. The Compliance Officer and the training area will maintain records and evidence of each training activity.

Similarly, employees joining Grupo Aguas must take part in an induction that will include basic knowledge about the Compliance Management System and other related matters, especially the Criminal Offense Prevention Model.

Training activities may be conducted either in person or virtually. Regardless of format, training will conclude with a knowledge test that must be passed. Each employee must undergo training or coaching in these matters at least every three years, or when changes to the Compliance Management System so warrant.

The frequency and content of message dissemination, as well as the holding of in-person or virtual training and coaching sessions, will be established in an Annual Training and Communications Plan, prepared by the Compliance Officer together with the department in charge of people management, and updated at least annually.

11. CONTINUOUS IMPROVEMENT

The organization will continually improve the effectiveness and efficiency of the Compliance Management System—which is integrated into the Integrated Management System (SGI) of Grupo Aguas—through monitoring its objectives, the results of internal and external audits, the analysis of actions, and the management review conducted by the Boards of Directors of Grupo Aguas companies and the Integrity and Compliance Committee.

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The Compliance Officer will ensure the ongoing update of the Compliance Management System in light of Company policies and the joint achievement of objectives for all ISO and similar certifications.

12. REPORTING OF BREACHES AND SANCTIONS

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

13. SANCTIONS

Breaches of this Policy—and, in particular, the commission of any conduct prohibited under the policies and procedures comprising the Compliance Management System—will give rise to the sanctions set forth in the law, employment contracts, the Company's Internal Rules of Order, Hygiene and Safety, and the various policies and procedures comprising the Compliance Policy, which may range from reprimands to 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 immediate contract termination in the event of serious breaches.

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

14. MONITORING AND REVISION

The Compliance Officer will be responsible for ensuring compliance with this Policy and will report directly to the Board of Directors and the Integrity and Compliance Committee on such compliance in their periodic report to Senior Management.

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

The Compliance Policy and the policies and procedures comprising it will be reviewed and updated, if necessary, at least once a year.

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15. CHANGE CONTROL

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00	August 2017	Not aplicable
01	August 2018	References to positions modified according to the new organizational structure. Reference to the Human Rights Policy incorporated in Section 6.6. Reference to the Corporate Risk Management Methodology and Annex: Application of the Corporate Risk Management Methodology to the Compliance Risk at Grupo Aguas incorporated in Sections 6.2 and 8.
02	August 2019	Composition of the Integrity and Compliance Committee modified according to the new organizational structure. Responsibilities of the Board of Directors expanded to include approval of updates to the Code of Ethics, Criminal Offense Prevention Model, and policies associated with the Compliance Management System.
03	May 2020	Formal and organizational adjustments as reported at Board meetings in February and May 2020.
04	November 2020	ESSAL S.A. removed from Grupo Aguas and other formal adjustments.
05	May 2021	“Grupo Aguas” replaced by “Grupo Andinas.”
06	May 2022	Corporate name changed from Gestión y Servicios S.A. to Hidrogística S.A.
07	May 2023	No changes.
08	May 2024	“Grupo Andinas” replaced by “Grupo Aguas.” Corporate name changed from Aguas del Maipo S.A. to Biogenera S.A.
09	June 2025	Document reviewed; no changes.