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**CONSUMER COMPLIANCE POLICY  
GA010030**

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

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## 1. OBJECTIVE

For Grupo Aguas, Compliance is much more than adherence to rules and standards. Compliance involves fostering a culture of integrity and corporate ethics that guides the behavior and decision-making of all employees within our organization, where the commitment to delivering excellent service to our customers is an essential part of the functions we perform daily.

In this regard, Grupo Aguas has adopted this Consumer Compliance Policy (hereinafter, interchangeably referred to as the “Consumer Policy” or the “Policy”), which defines the fundamental principles, criteria, and guidelines adopted by Aguas Andinas, Aguas Cordillera, and Aguas Manquehue (hereinafter, collectively referred to as Grupo Aguas) regarding compliance in the field of consumer rights protection. The purpose is to incorporate effective instruments for preventing legal and regulatory non-compliance, adapted to the legal and social complexities inherent to sanitation service providers and their interactions with customers within consumer relationships.

This Policy also constitutes a tool of sound corporate governance, reflecting the development of a culture of integrity that demonstrates the organization’s commitment to complying with the regulations that protect its customers—safeguarding their rights, their well-being, and their reasonable expectations.

## 2. SCOPE

This Policy applies to all companies that form part of Grupo Aguas (Aguas Andinas S.A., Aguas Cordillera S.A., and Aguas Manquehue S.A.) and shall be observed by all persons who are part of these companies at every level (directors, employees), whether acting in Chile or abroad. It also applies to third parties acting on behalf of the Company, whether under a service provision agreement or through any outsourced or subcontracted service, in accordance with the instruments designed for such purposes.

## 3. DOCUMENTS RELATED

The documents that complement and/or serve as a reference for this Policy are:

- Code of Ethics
- Compliance Policy
- Corporate Risk Management Methodology
- Annex: Application of the Corporate Risk Management Methodology to the Compliance Risk of Grupo Aguas
- Reporting, Investigation and Sanctions Procedure
- Integrated Management Policy
- Incident and Emergency Management Plan
- Commercial Policy

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- Credit Policy
- Rebilling and Commercial Considerations Policy
- Customer Service Policy

#### 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 being met.

**Customer or Consumer:** A natural or legal person who resides in or occupies a property that receives drinking water supply services or sewer services.

**Due Diligence:** A process for assessing the nature and scope of various risks, including the risk of engaging in conduct that may constitute an infringement of the Consumer Protection Law in connection with the provision of customer-facing services, assisting organizations in making sufficiently informed decisions.

**Grupo Aguas:** Refers to the companies Aguas Andinas S.A., Aguas Cordillera S.A., and Aguas Manquehue S.A.

**Law No. 19.496:** Law that establishes rules on the Protection of Consumer Rights, regulating the relationships between suppliers and consumers, defining violations against consumers, and setting out the applicable procedures for such matters.

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

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

#### 5. CONSUMER COMPLIANCE POLICY

##### 5.1 Principles of Conduct

This Policy reflects Grupo Aguas' commitment to consumer rights by establishing a model aimed at aligning the Company with the fulfillment of this objective—harmonizing commercial activity with respect for customers' basic principles and rights, and integrating the goals set forth in the Customer Strategy, which seeks to place the customer at the center of Grupo Aguas' activities. This is achieved through initiatives that ensure the availability and quality of basic services, improve customer experience and perception of benefits, strengthen multiple service channels, and implement new platforms for active customer engagement.

This Policy also considers the efforts that the Company has already undertaken in this area, as reflected in the establishment of a Customer Experience Department and a Customer Counsel Division, as well as in the certification obtained for compliance with the international standard ISO 9001 (Quality Management).

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### 5.1.1 Respect for Customers' Basic Rights

**Provide truthful and timely information:** Communicate all relevant circumstances of interest to customers concerning Grupo Aguas' operations related to service provision, in order to foster greater trust through transparent and open communication built on accurate and timely information. This also entails presenting information clearly and in sufficient time for customers to take any measures they deem necessary in their interactions with the organization—both under normal operating conditions and in cases of operational irregularities.

- **Act professionally, respecting customers' rights:** To prevent property and non-property damage to consumers, Grupo Aguas conducts its operations under high quality standards, ensuring full compliance with the obligations and responsibilities it has toward both its customers and the competent authorities, and avoiding situations that may lead to violations of consumer rights.
- **Maintain good-faith relationships:** Grupo Aguas recognizes the diverse needs and requirements of its customers or consumers and therefore promotes relationships based on trust and good faith throughout every stage of the consumer relationship, ensuring that their needs are properly addressed and satisfactorily met.
- **Timely resolution and remediation of risk situations:** In order to respond to its customers' evolving needs and expectations, Grupo Aguas shall adopt a proactive approach in addressing operational risks that result in harmful situations or that may compromise its operations and/or reputation, acting promptly to resolve such issues and, when applicable, to fully repair any material damages caused by the realized risk.
- **Ensure strict compliance with applicable laws:** Grupo Aguas shall fully comply with all laws that guarantee consumer relationships are conducted under the best possible conditions for its customers, in adherence to the principles of respect for human freedom and dignity, and commitment to the common good.

### 5.1.2 Engagement with Stakeholders

Grupo Aguas has developed a Stakeholder Matrix that identifies different categories and establishes the principles governing engagement with each of them, including our customers.

Furthermore, during the design of the Consumer Compliance Model, and for the purpose of determining the Group's external context, stakeholders have been analyzed from the perspective of legal compliance with Consumer Law.

Stakeholders play a highly relevant role in the outsourcing of services, as there is a possibility that, during the provision of such services, violations of the Consumer Protection Law may occur. Therefore, the necessary guidelines for preventing such infringements shall be established, in alignment with this Policy.

## 5.2 Roles and Responsibilities

The commitment undertaken by Grupo Aguas through this Policy requires the definition of roles, powers, and responsibilities for the various participants involved in managing the prevention of legal and regulatory non-compliance in consumer matters.

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### 5.2.1 Boards of Directors of Grupo Aguas Companies

- Promote a culture of respect for and protection of consumer rights within the Grupo Aguas companies.
- Appoint the Consumer Compliance Officer.
- Approve the Consumer Compliance Policy.
- Ensure commitment to compliance and to the proper management of non-compliance and behaviors contrary to the Consumer Compliance Model.
- Promote the development and implementation of internal control systems and the continual improvement of the Consumer Compliance Model.
- Allocate sufficient and appropriate resources for the effective operation of the Consumer Compliance Model.
- Receive, through the semi-annual reports of the Consumer Compliance Officer, information regarding the performance of the Model.

### 5.2.2 General Management / CEO

- Promote a culture of respect for and protection of consumer rights within the Grupo Aguas companies.
- Promote the development and implementation of internal control systems and the continual improvement of the Consumer Compliance Model.
- Allocate sufficient resources for the effective operation of the Model.
- Actively participate in measuring the performance of the Consumer Compliance Model.

### 5.2.3 Customer Service Department

- Promote a culture of respect for and protection of consumer rights within the Grupo Aguas companies.
- Oversee the monitoring and fulfillment of controls associated with this Policy.
- Propose corrective actions and strategies for the continual improvement of the Consumer Compliance Model.

### 5.2.4 Consumer Compliance Officer

The Consumer Compliance Officer shall have the necessary resources, competencies, and position, 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 reporting and in the event of contingencies or matters that must be addressed at those levels.

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The Consumer Compliance Officer shall be responsible for:

- Promoting a culture of compliance regarding the protection of consumer rights.
- Proposing, when appropriate, the approval of new policies and the corresponding updates or modifications to existing ones.
- Supervising the design and implementation of the Consumer Compliance Model.
- Providing advice and guidance to personnel regarding the Consumer Compliance Model and related matters.
- Monitoring the actions related to the Model.
- Training, advising, and guiding employees in all matters related to this Policy.
- Reporting at least semi-annually to the Board of Directors and the Integrity and Compliance Committee on the functioning of this Policy and the Consumer Compliance Model.

#### 5.2.5 Compliance Officer

- Provide subsidiary support to the management carried out by the Consumer Compliance Officer, as well as promote this Policy in cases where the position is held by different persons.

#### 5.2.6 Grupo Aguas Employees

- Participate in training sessions and other educational activities.
- Comply with the obligations established in the Consumer Compliance Policy and related policies and procedures.

### 6. IMPLEMENTATION

Grupo Aguas has adopted this Policy as a tool for the design and implementation of a compliance model focused on the protection of consumer rights, in accordance with its structure and operational reality. It establishes a program that addresses exposure to consumer law infringement risks through the application of Law No. 19.496, the identification of infringement vulnerabilities, the adoption of a customer service aligned with rational standards, and the establishment of protocols for the treatment, monitoring, and supervision of such risks, as well as the periodic need for updates and training.

This Policy shall be implemented across all areas of each company that forms part of Grupo Aguas.

#### 6.1 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

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management of mitigating controls. For risks associated with the Compliance Management System, this methodology includes an Annex that defines the process applied to risks of engaging in corrupt conduct.

The outcome of this process is embodied in a Compliance Risk Matrix, which is reviewed and updated at least annually by the Compliance Officer, to incorporate changes in the company and its environment and to periodically assess the effectiveness and validity of the controls.

For these purposes, and in accordance with the Annex: Application of the Corporate Risk Management Methodology to Compliance Risks, a Consumer Law Compliance Risk Matrix shall be developed to summarize the identified risks, existing controls, and the action plans to be implemented where necessary.

In the context of this Policy, risks are directly or indirectly related to Grupo Aguas' ability to uphold its commitment to society, and therefore, the organization has progressively incorporated additional tools to ensure the effectiveness of its compliance efforts.

Accordingly, consumer compliance risks include the possibility of engaging in infringing conduct, which could lead to fines, complaints, individual or collective mediations, and/or individual or collective lawsuits.

Furthermore, the reputational risk is also considered, as it may arise not only from legal non-compliance but also from conduct that may be classified as bad practices, which, once verified and made public, could result in a loss of brand value, revenue reduction, administrative proceedings, and/or civil lawsuits.

## 6.2 Identification of Infringement Vulnerabilities

The Consumer Compliance Model, with respect to the detection of vulnerabilities, is structured based on ten core risks that categorize, by subject matter, the various behavioral obligations imposed on providers by law. These are analyzed in accordance with Grupo Aguas' processes and sub-processes to identify potential risks and/or vulnerabilities of non-compliance.

Accordingly, and directly related to what is described in section 6.1 *above*, the risks in this area arise from the various forms of conduct derived from Law No. 19.496, legal doctrine, and case law.

## 6.3 Controls

The design, implementation, and proper application<sup>1</sup> of a Consumer Compliance Model or Plan (hereinafter, interchangeably referred to as the "Model" or the "CCM") entail the commitment of the Grupo Aguas companies to adapt their processes to ensure compliance with the obligations owed to each of their customers, particularly when they act in their capacity as consumers.

The foregoing requires the effective commitment of senior management and all employees of Grupo Aguas, which must be reflected in adherence to the good practices set forth in the

<sup>1</sup> According to NCh 19.600, the following stages are distinguished: establish and develop (both corresponding to the design phase); implement (corresponding to implementation); and evaluate, maintain, and improve (corresponding to proper application).

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company's internal policies, the values and principles established in its Code of Ethics and, in particular, in this Policy for these purposes.

The Model, in turn, will be developed on the basis of this Policy, which seeks to foster an organizational culture of respect for Consumer Rights, safeguarded by a network of control and support among employees. This is verified through the development of a matrix of required conduct standards<sup>2</sup> and infringement risks<sup>3</sup> associated with the main processes of Grupo Aguas, under Law No. 19.496 on the Protection of Consumer Rights and other special or sectoral regulations that may apply to the end consumer.

Furthermore, the levels of conduct required for risk-related functions and their corresponding responsibilities, control and monitoring measures, internal manuals, training for employees most exposed to this type of infringement risk, a channel for reporting risky or irregular situations or behaviors, and other activities that enable the effective, comprehensive, and good-faith implementation of this Policy across all internal processes that manage and record the company's operations, will be adopted.

These and other controls are described in the Policies and Procedures governing each process, such as the Commercial Policy, the Customer Service Policy, among others.

#### 6.4 Dissemination and Training

The Consumer Compliance Policy shall be available to all personnel on Aquanet, on the websites of the Grupo Aguas companies, and on the document management 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, and information sheets, among others.

Annual training sessions shall be planned to provide all Grupo Aguas workers with sufficient knowledge on these matters, beginning with personnel most exposed to the risk of committing acts that may constitute a breach under the Consumer Protection Law.

Similarly, workers joining Grupo Aguas shall participate in an induction process containing basic information about the Consumer Compliance Policy.

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.

### 7. REPORTING OF NON-COMPLIANCE

Any employee who witnesses a non-compliance with the provisions set forth in this Policy or in related policies, processes, or procedures may report it through the Grupo Aguas Whistleblowing Channel, available on Aquanet and on the company's website, or by contacting directly the Consumer Compliance Officer.

<sup>2</sup> Shall be understood as compliance obligations, in accordance with NCh 19.600, Definition 3.6.

<sup>3</sup> Shall be understood as compliance risk, in accordance with NCh 19.600, Definition 3.12.

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## 8. SANCTIONS

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

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

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

## 9. MONITORING AND UPDATE

The Consumer Compliance Officer shall be responsible for ensuring compliance with this Policy and shall report to the Board of Directors at least once a year.

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

## 10. REVISION HISTORY

REVISION HISTORY		
VERSION No.	DATE	REMARKS
00	November 2020	Not Applicable
01	November 2021	Formal adjustments incorporated.
02	May 2022	"Grupo Aguas" replaced by "Grupo Andinas".
03	May 2023	Document reviewed — no changes applicable.
04	May 2024	"Grupo Andinas" replaced by "Grupo Aguas".
05	June 2025	Document reviewed — no changes applicable.