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# AGUAS

## CONFLICT OF INTEREST MANAGEMENT POLICY

**CODE: GA010066**

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. 1. BACKGROUND

In its ongoing commitment to continuous improvement in the field of Corporate Governance best practices, Aguas Andinas S.A. (hereinafter, indistinctly, “Aguas Andinas,” the “Company,” or the “Entity”) has made steady progress toward implementing enhanced practices for managing conflicts of interest and related-party transactions.

Accordingly, this Board of Directors has in the past approved the Code of Conduct of the Board of Directors (2013), the Manual for the Management of Market-Relevant Information (2010), the General Policy on Regularity (2010), and the Company has also developed the Compendium of Corporate Governance Policies and Procedures (2015), as well as the documents forming part of the Compliance Management System relating to these matters, including the Gifts, Invitations and Travel Procedure and the Conflict of Interest Management Procedure.

## 2. OBJECTIVE

In this context, the Company has prepared the following document with the objective of establishing the general criteria for the management of conflicts of interest by its members, identifying the main situations that could constitute a potential conflict of interest, and determining the mechanisms for declaring, addressing, and resolving such conflicts by the Directors, the Chief Executive Officer, and the Principal Executives (all of them hereinafter, jointly and indistinctly, the “Directors”).

Thus, together with the Conflict of Interest Management Procedure and related documents, which apply to all other members of the Company, all persons linked to Aguas Andinas and its subsidiaries have a regulatory framework of reference for the management of conflicts of interest.

## 3. GENERAL ASPECTS

The OECD Principles of Corporate Governance published in 1999 (the “Principles”) have become an international frame of reference for legislators, investors, securities issuers, and other interested stakeholders worldwide. They identify the foundations of sound corporate governance and provide practical guidance for their application at the national level.

With regard to transactions between related parties, Principles establish that such transactions shall be approved and carried out in a manner that ensures proper management of conflicts of interest and protects the interests of the company and its shareholders. The underlying rationale is that these transactions may entail potential abuse, and therefore, conflicts must be properly managed through appropriate oversight and disclosure measures, among others.

In accordance with Article 50 bis of the Corporations Law, as amended by Law No. 21,314, it is the responsibility of the Directors’ Committee to propose a general policy on conflicts of interest.

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In view of the foregoing, at Ordinary Session No. 538 of 28 February 2023, the Company's Directors' Committee proposed to the Board of Directors the present version of the Conflict of Interest Management Policy, which was approved by the Board at that same session.

In the implementation of this Policy, and in all actions taken pursuant thereto, the current securities market legislation applicable to the Company's specific business activities shall be observed, in particular Law No. 18,045 on the Securities Market (hereinafter also the "LMV") and Law No. 18,046 on Corporations (hereinafter also the "LSA"), both dated 22 October 1981, the Regulation on Corporations enacted by Supreme Decree No. 702 of the Ministry of Finance in 2011, as well as the regulations currently in force issued by the Financial Market Commission (hereinafter the "CMF"), including those issued by its legal predecessor, the Superintendence of Securities and Insurance.

#### 4. CONCEPT OF CONFLICT OF INTEREST

A conflict of interest arises when the personal interests of a Director, Manager, and/or Principal Executive, an employee of the Company, or advisors of the Group, or the interests of a third party related to any of the foregoing, actually or potentially compete with the interests of Aguas Andinas.

A conflict of interest shall be understood as "the incompatibility that occurs in any act or transaction between Aguas Andinas and a third party, whether a natural or legal person, when between such third party and the person who evaluates, carries out, or decides such act and/or participates in the management, supervision, control, or oversight of the processes derived therefrom, there exist business, family, or emotional relationships that may give rise to a presumption of lack of independence or impartiality."

All of the above increases the possibility of directly or indirectly and unduly benefiting, indistinctly, the related person and/or the Company's personnel involved in any of the acts described in the preceding definition.

#### 5. SITUATIONS OF CONFLICT OF INTEREST

In the first instance, attention must be paid to the situations regulated under Title XVI of the Corporations Law (LSA) concerning Transactions with Related Parties, which establishes that all negotiations, acts, contracts, or transactions in which the company must be involved and, additionally, any of the following persons participate, shall constitute transactions with related parties:

- 1) One or more persons related to the company, in accordance with Article 100 of the Securities Market Law (LMV).
- 2) A director, manager, administrator, principal executive, or liquidator of the company, either personally or on behalf of another person distinct from the company, or their respective spouses or relatives up to the second degree of consanguinity or affinity, inclusive.

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- 3) Companies or entities in which the persons indicated in the previous item are owners, directly or through other natural or legal persons, of ten percent (10%) or more of the capital, or act as directors, managers, administrators, or principal executives.
- 4) Those established in the company's bylaws or duly identified by the Directors' Committee, where applicable, even when referring to those indicated in the final paragraph of Article 147 of the LSA.
- 5) Entities in which any director, manager, administrator, principal executive, or liquidator of the company has served in such capacity within the last eighteen (18) months.

The various activities of the Company may generate situations of conflicts of interest for a director or principal executive in connection with i) the Company's customers; ii) suppliers; iii) companies related to the Company; and iv) the Company's employees.

Additionally, and without this constituting a taxative list, the following situations shall also be considered when determining the existence of a conflict of interest:

1. One or more persons related to the company, in accordance with Article 100 of the Securities Market Law (LMV).
2. A director, manager, administrator, principal executive, or liquidator of the company, either personally or on behalf of another person distinct from the company, or their respective spouses or relatives up to the second degree of consanguinity or affinity, inclusive.
3. Companies or entities in which the persons indicated in the previous item are owners, directly or through other natural or legal persons, of ten percent (10%) or more of the capital, or act as directors, managers, administrators, or principal executives.
4. Those established in the company's bylaws or duly identified by the Directors' Committee, where applicable, even when referring to those indicated in the final paragraph of Article 147 of the LSA.
5. Entities in which any director, manager, administrator, principal executive, or liquidator of the company has served in such capacity within the last eighteen (18) months.

## 6. MECHANISMS TO AVOID AND RESOLVE CONFLICTS OF INTEREST

Directors shall identify and, to the extent possible, avoid situations involving conflicts of interest.

Role of the Compliance Officer. It should be noted that since 2014, Aguas Andinas and its subsidiaries have appointed a Compliance Officer, generally responsible for ensuring that the actions of the members of the Company remain within the framework of legality, the Code of Ethics, and, in general, the Compliance Management System.

Accordingly, it shall form part of the obligations of the Company's Compliance Officer to be available to the members of the Board of Directors in order to address any doubts regarding the existence of a conflict of interest, the appropriate manner of acting thereon, or, in

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general, the application of the various procedures set out in the Compliance Management System for their proper handling.

Where conflicts cannot be avoided, they shall be managed in accordance with the following procedure:

### 1. Duty to Inform:

Directors shall immediately and in writing inform the Board of Directors, through the Chair of the Company or whoever acts in their place, of any substantial interest they may hold, directly, indirectly or on behalf of third parties, in any transaction of the Company or in matters that affect it directly; and in particular if they have an interest in or participate in negotiations leading to a transaction with related parties of the Company.

Any Director who fails to comply with this obligation shall be deemed to have seriously breached their duties as a Director.

In the case of a related-party transaction regulated under Title XVI of the Corporations Law (Ley Sobre Sociedades Anónimas – LSA), the duty to inform shall be fulfilled by notifying the Chair of the Directors’ Committee.

The Chair shall, in turn, inform the Board of Directors of any conflict of interest reported pursuant to Section 2.2 below and shall take the necessary measures to ensure compliance with the applicable legal provisions.

### 2. Report of the Directors’ Committee and/or Approval by the Board of Directors:

2.1. In any case, if despite the existence of a conflict of interest in a negotiation, act, contract or transaction involving the Company — or in other situations where decisions must be taken concerning it — such act, contract, transaction or decision aims to contribute to the corporate interest and is consistent in price, terms and conditions with those prevailing in the market at the time of its approval, it may be executed following the report of the Directors’ Committee pursuant to Article 50 bis of the LSA and with the corresponding authorization of the Board of Directors.

Directors affected by a conflict of interest shall abstain from voting at the meeting of the Board of Directors or committee where the matter is discussed, except where the transaction is covered by the Company’s Regularity Policy, in which case such provisions shall govern.

In the case of conflicts of interest arising from related-party transactions, strict compliance with Law No. 18,046 on Corporations and its Title XVI shall be observed.

Should related-party transactions be approved in contravention of the said Title XVI, the Directors shall be presumed liable and shall be jointly responsible for any damages caused to the Company, its shareholders or third parties.

In all cases, conflicts of interest shall be resolved by the Board of Directors on the basis of the following principles:

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- a) In the event of a conflict of interest between one or more Directors and Aguas Andinas, the interest of the latter shall always prevail.
- b) The Directors of the Company shall conduct themselves in accordance with the legislation in force governing the securities market that affects the specific scope of activity of the Company, and in particular Law No. 18,045 on the Securities Market, Law No. 18,046 on Corporations, the Regulation of Corporations, and the current regulations issued by the Financial Market Commission (CMF).

2.2. In cases where the transaction is not required to be reviewed in advance by the Directors' Committee under the aforementioned Title XVI of the LSA, the relevant agreement shall be considered and approved directly by the Company's Board of Directors.

## 7. SCOPE OF THE POLICY

The Conflict of Interest Management 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 it shall be observed by all individuals who belong to said companies, at every level.

In particular, this Policy shall apply to the Directors; however, employees, as well as any third party acting on behalf of the Company, must also comply with it as applicable, considering in such cases the application of other procedures established within the Company, including those of the Compliance Management System.

## 8. MECHANISM FOR THE DISSEMINATION OF THE CONTENTS OF THE CODE OF CONDUCT

In order to ensure that all interested parties may be informed about Aguas Andinas' policies regarding the management of conflicts of interest, as from the date of entry into force of this document, it shall be made available to the Directors, employees, investors, and the general public on the Company's website.

It shall also be published on the Company's intranet portal, accessible to all employees, for their awareness and dissemination of its contents, and its entry into force shall be publicly announced through internal communication distributed to the entire organization.

## 9. ANNUAL DECLARATION

Directors shall complete, on an annual basis, a Directors' Statement of Interests Form and update it whenever any change occurs with respect to the information declared during the current year.

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## 10. REVISION HISTORY

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VERSION No.	DATE	REMARKS
00	February 2023	The Policy shall enter into force on February 28, 2023, on which date the Board of Directors' Code of Conduct shall be repealed.
01	May 2024	Grupo Andinas is replaced by Grupo Aguas. The corporate name Aguas del Maipo S.A. is replaced by Biogenera S.A.
02	June 2025	The document has been reviewed; no changes have been made.