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| <b>Status:</b>         | Approved   | <b>Name:</b><br>Procedure for Interaction with Public Officials and Lobby | <b>Type:</b> | Document  |
| <b>Version number:</b> | 07         |   | <b>Code:</b> | GA0460020 |
| <b>Effective date:</b> | 08/05/2023 |   | <b>Page:</b> | 1 of 15   |



**Procedure for Interaction with Public Officials and Lobby**  
**CODIGO: GA0460020**

| ROUTE OF VALIDATION |   |                                    |
|---------------------|---|------------------------------------|
| FUNCTION            | POSITION                                | ORGANIZATIONAL UNIT                |
| ELABORATED FOR:     | COMPLIANCE OFFICER                      | COMPLIANCE GRUPO ANDINAS           |
| CONSENSUS:          | MANAGEMENT SYSTEM CONSULTANT COMPLIANCE | COMPLIANCE GRUPO ANDINAS           |
| APPROVED BY:        | INTEGRITY AND COMPLIANCE COMMITTEE      | INTEGRITY AND COMPLIANCE COMMITTEE |

|                 |            |   |       |           |
|-----------------|------------|---|-------|-----------|
| Status:         | Approved   | <b>Name:</b><br>Procedure for Interaction with Public Officials and Lobby | Type: | Document  |
| Version number: | 07         |   | Code: | GA0460020 |
| Effective date: | 08/05/2023 |   | Page: | 1 of 15   |

**INDEX**

**TABLE OF CONTENTS**

INDEX..... 2

1. OBJECTIVE..... 3

2. SCOPE ..... 3

3. REFERENCE DOCUMENTS..... 3

4. DEFINITIONS ..... 4

5 RESPONSABILITIES..... 5

6. PROCEDURE..... 6

    6.1 Generalities..... 6

        6.1.1 Prohibitions ..... 6

    6.2 Relations with Public Officials in General ..... 7

        6.2.1 Communications..... 7

        6.2.2 Meetings ..... 8

    6.2.3 Audits ..... 8

    6.2 Lobbying and Interest Management ..... 9

        6.2.1 Formal Hearing Request ..... 9

        6.2.2 Answer ..... 10

        6.2.3 Hearing celebration ..... 10

        6.2.4 Register..... 10

    6.3 Facilitation Payments ..... 10

    6.4 Representation by third parties..... 11

7. TABLE OF RECORDS..... 11

8. REPORT OF NON-COMPLIANCE ..... 11

9. SANCTIONS..... 11

10. FOLLOW UP AND UPDATE ..... 11

11. CONTROL OF CHANGES ..... 12

EXHIBIT I..... 13

|                 |            |  |       |           |
|-----------------|------------|--|-------|-----------|
| Status:         | Approved   | Name:<br>Procedure for Interaction with Public Officials and Lobby | Type: | Document  |
| Version number: | 07         |  | Code: | GA0460020 |
| Effective date: | 08/05/2023 |  | Page: | 1 of 15   |

## 1. OBJECTIVE

Integrity is one of the fundamental principles that should guide the behavior of employees of Grupo Andinas. This is established in the Ethical Code, which disapproves of corruption in any of its forms. In this sense, the company has implemented an Anti-Corruption Policy that aims to concretize these principles and serve as a guide for the actions of employees of Grupo Andinas at all levels, guiding them regarding what the company expects and demands from their behavior when dealing with third parties, including business partners, the company's own employees, and especially, public officials.

This procedure is part of the company's Comprehensive Anti-Corruption Management System and complements the Ethical Code, the Compliance Policy, and other internal policies, especially the Crime Prevention Model of the Andinas Group.

## 2. SCOPE

This Policy applies to all the companies that make up the Andinas Group (Aguas Andinas S.A., Aguas Cordillera S.A., Aguas Manquehue S.A., Hidrogística S.A., Análisis Ambientales S.A., Ecoriles S.A., and Aguas del Maipo S.A.), and must be observed by all individuals who are part of these companies at all levels (directors, employees), whether they operate in Chile or abroad (indifferently "Grupo Andinas", Group, the "Enterprise", or the "Company"). It also applies to all companies, subsidiaries, and associations in which any Andinas Group company has control.

Additionally, it applies to all companies, subsidiaries, and associations in which any company of the Andinas Group has control. In those cases, in which the company lacks such control or has equal participation with other associates, it should be urged that policies and measures be adopted and implemented that contribute to preventing acts of corruption.

## 3. REFERENCE DOCUMENTS

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

- Ethical Code.
- Compliance Policy.
- Anti-corruption Policy.
- Anti-Corruption Management System Manual.
- Crime Prevention Model.
- Procedure for Complaints, Investigations, and Sanctions.
- Procedure for Gifts, Invitations, and Travel.
- Conflict of Interest Management Procedure.
- Donations and Sponsorships Policy.
- Donations Committee Procedure.
- Internal Regulations for Order, Hygiene, and Safety.
- Instructions for Dealing with Public Officials.

|                 |            |  |       |           |
|-----------------|------------|--|-------|-----------|
| Status:         | Approved   | Name:<br>Procedure for Interaction with Public Officials and Lobby | Type: | Document  |
| Version number: | 07         |  | Code: | GA0460020 |
| Effective date: | 08/05/2023 |  | Page: | 1 of 15   |

#### 4. DEFINITIONS

**Improper Benefit:** It can be any kind of compensation, direct or indirect, economic or of any other nature, including valuable items, cash, transfers, investments, hiring of third parties (family members or friends of the person who will benefit), etc., used to gain the favor of the bribee, or for the purposes of this procedure, provided in consideration of the bribee's position when they are a public official. Among the mentioned objects or benefits are, among others and not limited to:

- Cash.
- Gifts.
- Invitations to entertainment activities.
- Meals.
- Financing of trips.
- Participation in business.
- Job offers.
- Scholarships.
- Discounts on products, advantageous credit terms, debt payment.
- Assistance or support to family members.
- Contributions to political parties or campaigns.
- Personal or sexual advantages.

**Courtesy benefit or attention:** It refers exclusively to those benefits or objects that are of little economic value that are authorized by custom as manifestations of courtesy and good manners. It includes, for example, corporate gifts of little value, such as merchandising objects, or the offer of water, coffee or access to health services.

**Corruption:** It is made up of two behaviors, on the one hand, (i) The abuse that a person makes of the position they occupy within a public or private organization, to obtain a benefit for themselves or for others, to which they have no right. ; while on the other, (ii) the delivery of economic or other benefits, in order to be favored in some way, and especially within bidding processes in which it is participating.

**Public Employee:** Any person who performs functions in any entity that provides a public service and that depends on public bodies, whether the Central Administration, municipal or autonomous institutions, regardless of whether they are designated by law, or by election or appointment of the competent authority to participate in the exercise of public functions. By way of example and not exhaustive, public officials will be considered: ministers, undersecretaries, superintendents, mayors, mayors, councilors, municipal officials, deputies, senators, judges, prosecutors, personnel of the various local and national public departments, employees of state companies., etc., whether they are national or foreign. For lobbying purposes, the list of officials in Annex No. I of this document can be used as a reference.

**Management of Private Interests:** Unpaid management or activity carried out by natural or legal persons, Chilean or foreign, aimed at promoting, defending, or representing any particular interest, seeking to influence the decisions that authorities or officials obliged by Law No. 20,730, which regulates lobbying ("Law 20.730"), must make in the exercise of their functions.

**Lobby:** Management or remunerated activity, carried out by natural or legal persons,

|                 |            |  |       |           |
|-----------------|------------|--|-------|-----------|
| Status:         | Approved   | Name:<br>Procedure for Interaction with Public Officials and Lobby | Type: | Document  |
| Version number: | 07         |  | Code: | GA0460020 |
| Effective date: | 08/05/2023 |  | Page: | 1 of 15   |

Chilean or foreign, whose objective is to promote, defend or represent any particular interest, which seeks to influence decisions, which, in the exercise of their functions, must adopt the authorities or officials bound by Law 20,730, which regulates the Lobby.

**Meeting or hearing Law 20.730:** Refers to the act of hearing, in which an authority or public official (taxable subject) receives a lobbyist or manager of particular interests, in person or virtually (through videoconference). Conversations carried out via telephone, email or other communication platforms are excluded by the Law.

**Meeting Registration System with Public Officials:** Computer system accessible through the Aquanet Compliance portal, in which meetings held with public officials or requests for hearings related to Law 20.730 must be recorded, completing the predetermined forms.

**Bribery:** It means offering, promising, giving or accepting to give an economic or other benefit to a public official or a third party, as an incentive or reward to carry out or refrain from carrying out activities inherent to their function, for having carried out or omitted them, for acting in violation of the duties of his position, to commit a crime or solely by reason of his position.

**Active Subject:** Refers to those who carry out lobbying or private interest representation activities before the authorities or officials regulated by Law 20.730.

**Passive Subject:** Those authorities and public officials regulated by Law 20.730 or those determined by the Service Head (by reasoned resolution in May of each year) before whom lobbying or private interest representation activities are carried out.

## 5 RESPONSABILITIES

### Directory:

- Approve the Anti-Corruption Policy

### General Manager:

- Know and approve, when appropriate, the meetings and minutes of meetings with public officials maintained by the Area Directors.
- Make the appropriate recommendations for holding meetings with public officials.

### Compliance Officer:

- Know, when applicable, the meetings and minutes of meetings with public officials held by the workers of the Andinas Group
- Make the appropriate recommendations for holding meetings with public officials.
- Make known and train workers about this procedure

### Area Directions and Management:

- Know and approve, when appropriate, the minutes of meetings with public officials maintained by their workers.
- Make the appropriate recommendations for holding meetings with public officials.

|                 |            |  |       |           |
|-----------------|------------|--|-------|-----------|
| Status:         | Approved   | Name:<br>Procedure for Interaction with Public Officials and Lobby | Type: | Document  |
| Version number: | 07         |  | Code: | GA0460020 |
| Effective date: | 08/05/2023 |  | Page: | 1 of 15   |

**Andinas Group Workers:**

- Request the hearings of Law 20.730 through the forms provided for this purpose.
- Record all meetings held with public officials.
- Comply with this procedure.

**6. PROCEDURE**

**6.1 Generalities**

In the development of its ordinary activity, Andinas Group maintains constant relations with the public administration, state companies and various public officials. Within the framework of these interactions, the company promotes transparency, and expects its workers to act within what is permitted by internal regulations, respecting the Code of Ethics, the Compliance Policy, the Anti-Corruption Policy and its related procedures, the Model of Crime Prevention of the Andinas Group and other applicable internal regulations. Conflicts of interest must always be disclosed and conduct that could be interpreted as an attempt to obtain improper compensation should be avoided. In those cases, in which the relationship with the public administration occurs within the framework of external regulation, such as lobbying and interest management actions, this regulation will be a reference and its compliance will be mandatory.

The purpose of this procedure is to specify the general principles of action of the Andinas Group, describing the criteria and standards that must guide the performance of the functions and responsibilities of workers in the context of interactions with authorities and public officials. In addition to the provisions of this document, workers must know and strictly comply with the rules referring to public officials established in the Gifts, Invitations and Travel Procedure and in the Conflict of Interest Management Procedure.

At Grupo Andinas, all forms of corruption and bribery are strictly prohibited.

Bribery of national or foreign public officials is a crime that can be punished with prison sentences and can lead to criminal liability of the legal person as provided by Law 20.393. For its part, bribery between private parties can also generate liability for legal entities, in accordance with the provisions of the same law.

**6.1.1 Prohibitions**

Regarding national and foreign public officials, and without the following list being exhaustive, it is prohibited:

- Offer, give, or accept to give improper benefits of any nature:
  - o Due to the position of the public official.
  - o For officials to carry out or have carried out any action inherent to their position, for the benefit of any of the companies of the Andinas Group.
  - o For officials to omit or have omitted any action inherent to their position, for the benefit of any of the Andinas Group companies.
  - o To influence another public official to make decisions that may benefit or compromise the company.

|                        |            |   |              |           |
|------------------------|------------|---|--------------|-----------|
| <b>Status:</b>         | Approved   | <b>Name:</b><br>Procedure for Interaction with Public Officials and Lobby | <b>Type:</b> | Document  |
| <b>Version number:</b> | 07         |   | <b>Code:</b> | GA0460020 |
| <b>Effective date:</b> | 08/05/2023 |   | <b>Page:</b> | 1 of 15   |

- So that they commit crimes, particularly those expressed in paragraph 4 of Title III of the Penal Code, and in Title IX of Title V of the same regulatory body.
- Regarding foreign public officials, to obtain or maintain any business or advantage in the context of an international transaction or an economic activity carried out abroad.
- Exerting undue influence on a public official with whom there is a personal relationship (kinship, friendship, mutual business, politics, etc.) with the purpose of obtaining from him a resolution beneficial to the interests of Grupo Andinas.
- Request or accept a benefit of any kind in exchange for unduly influencing a public authority or official.
- Contribute to a public official stealing or diverting funds under his or her responsibility.

## 6.2 Relations with Public Officials in General

### 6.2.1 Communications

- All communications from Grupo Andinas workers in the exercise of their duties must be made through corporate media. This means that, for example, emails or instant messaging of a personal nature should not be used, without prejudice to exceptions for routine cases, emergencies, alerts and/or contingencies. With respect to public officials, this becomes even more relevant, so it is expected that the general rule will be to conduct communications in writing (materially or digitally).
- In the case of telephone conversations, it is expected that the making of any type of decision that has effects on the company will subsequently be left in writing in the terms described in the previous paragraph.
- Emails and written communications in general must always be copied to the hierarchical superior and/or other employee of the Andinas Group that corresponds depending on the matter discussed.
- Communications related to circulars, official letters and other requests or information from the Superintendency of Health Services must be channeled through the Single Window, who will receive, channel and respond to these procedures.
- In cases of emergency, alerts, contingencies, and if the situation warrants it, in order to maintain the fluidity of communications with the authorities, action may be taken with the exception of this procedure, using the means of communication that is deemed most appropriate. effective. However, once the emergency or contingency is over, the hierarchical superior must be informed in writing about the officials or public institutions with whom contact was made through non-corporate means and the decisions that may have been made during the period.
- In all those emails between workers of the Andinas Group and public officials, the following phrase must be added at the end of them: "By application of the provisions of Law 20.393, the Crime Prevention Model, the Code of Ethics, the Compliance Policy, the Anti-Corruption Policy and its associated procedures, the workers of Grupo Andinas will try to interact with public officials preferably through

|                        |            |   |              |           |
|------------------------|------------|---|--------------|-----------|
| <b>Status:</b>         | Approved   | <b>Name:</b><br>Procedure for Interaction with Public Officials and Lobby | <b>Type:</b> | Document  |
| <b>Version number:</b> | 07         |   | <b>Code:</b> | GA0460020 |
| <b>Effective date:</b> | 08/05/2023 |   | <b>Page:</b> | 1 of 15   |

their institutional emails.”

### 6.2.2 Meetings

The workers of Grupo Andinas must meet with public officials on several occasions, and they are not expected to limit these instances, as they are necessary to conduct the company's activities in a good manner. However, certain precautions must be taken to avoid misunderstandings.

- At least two workers from the Andinas Group must always participate in meetings with public officials. In case of impossibility, the reason must be recorded in the meeting record.
- Meetings held at Grupo Andinas offices must be held in meeting rooms. Where there are no meeting rooms, we will seek to maintain transparency as much as possible. In any case, public officials, as well as any third-party entering Grupo Andinas offices, must be registered by showing their identity card or passport, recording at least their name, their RUT, and the date and time of entry. entrance and departure. In venues that do not have an automated computer system for these purposes, the most effective registry will be available.
- It is expected that meetings held with public officials outside Grupo Andinas offices will be held in their offices or in public places when the situation warrants it.
- Gifts or hospitality should not be offered to public officials while they are on Grupo Andinas premises, with the exception of courtesy services (for example, coffee, water or toilet service). Workers should also not receive hospitality beyond basic courtesies when they are in public facilities.
- All face-to-face meetings that are scheduled with a public official must be informed prior to their implementation, through the electronic calendar, to the hierarchical superior of the Andinas Group employee who attends and to the Compliance Officer at the email address [compliance@aguasandinas.cl](mailto:compliance@aguasandinas.cl). In addition, the date, place, other attendees, purpose of the meeting and public official who receives them must be indicated in the summons.
- All meetings with public officials held must be recorded in the Compliance Records System available on the intranet, by completing the form provided for this purpose.

### 6.2.3 Audits

Various public authorities have the power to supervise the companies of the Andinas Group in any of their facilities or works, with or without prior notice. The workers of Grupo Andinas must collaborate. Public officials will be received by one or more workers of Grupo Andinas, who will accompany them throughout their stay in the company's offices.

- Public officials who must enter the offices of Grupo Andinas must be registered by showing their identity card or passport, recording at least their name, their RUT, the public entity they represent and the date and time. entry and exit. In venues that do not have an automated computer system for these purposes, the most effective registry will be available.
- Gifts or hospitality should not be offered to public officials while they are on Grupo Andinas premises, with the exception of courtesy services (for example, coffee, water or toilet service).



|                 |            |   |       |           |
|-----------------|------------|---|-------|-----------|
| Status:         | Approved   | <b>Name:</b><br>Procedure for Interaction with Public Officials and Lobby | Type: | Document  |
| Version number: | 07         |   | Code: | GA0460020 |
| Effective date: | 08/05/2023 |   | Page: | 1 of 15   |

- Once the procedure is completed, the worker in charge must register the event in the Compliance Records System. available on the intranet, by completing the form provided for this purpose. In the event that there is a Record delivered by the public official during the inspection, this will be sufficient for registration purposes, and must be uploaded to the aforementioned system.

## 6.2 Lobbying and Interest Management

The Andinas Group defines lobbying and defense of interests as the promotion of the interests of its entities through objective information, the difference between both activities being the fact that there is remuneration for carrying them out (the lobbyist receives remuneration for its activities as such, while the interest manager does not). Ultimately, it is about making Grupo Andinas known, promoting its image, its values, its activities and its services, as well as defending its interests.

When an institution or country regulates the activity of lobbying, as is the case in Chile, entities must respect these regulatory obligations and only employ registered and authorized lobbying professionals. If third parties outside the company are going to be hired to perform this function and represent it in lobbying activities, commitment and subjection must be required on their part to the Code of Ethics, the Compliance Policy, the Anti-Corruption Policy, and this procedure. and to any other document that is deemed pertinent, particularly the Crime Prevention Model of the Andinas Group.

The activities regulated by the Lobby Law are considered those that seek to adopt or not adopt the following decisions and acts:

- Preparation, dictation, modification, repeal or rejection of administrative acts, bills and laws, and also of the decisions made by the authorities.
- Preparation, processing, approval, modification, repeal or rejection of agreements, declarations or decisions of the National Congress or its members, including its commissions.
- Celebration, modification or termination of any contract made by the authorities and that are necessary for its operation.
- Design, implementation and evaluation of policies, plans and programs carried out by the authority.

Meetings that are not intended to influence the actions mentioned above should not be registered as lobbying activities or management of particular interests.

Generally, when requesting a meeting with obligated public officials, we will be required to proceed in the manner provided in this procedure. Otherwise, the workers of Grupo Andinas must demand that this be the case. For the purposes of the Lobby Law, this procedure must be applied with respect to the authorities indicated in Annex No. I of this document.

The steps that must be followed to carry out a hearing are detailed below, in accordance with the provisions of Law 20.730.

### 6.2.1 Formal Hearing Request

The online form available on the Transparent Government web platform corresponding to

|                        |            |   |              |           |
|------------------------|------------|---|--------------|-----------|
| <b>Status:</b>         | Approved   | <b>Name:</b><br>Procedure for Interaction with Public Officials and Lobby | <b>Type:</b> | Document  |
| <b>Version number:</b> | 07         |   | <b>Code:</b> | GA0460020 |
| <b>Effective date:</b> | 08/05/2023 |   | <b>Page:</b> | 1 of 15   |

each institution or public service must be completed. Through this, information is requested such as the individualization of the person requesting the meeting, the matter to be discussed and, additionally, whether or not there is remuneration for the activity carried out. This is part of the obligations established by law in order to comply with the duty to inform. In the event that the meeting is going to be held by a lobbyist or an interest manager external to Grupo Andinas, he or she will be obliged to comply with this registration.

The information provided from the form must be absolutely transparent and in accordance with the true purposes of the meeting to be requested, thus complying with one of the fundamental principles of Grupo Andinas about acting honestly.

This form must be reported to the hierarchical superior, and to the Compliance Officer, through the Compliance Records System.

### 6.2.2 Answer

Once the hearing request has been sent, the regulations of Law 20.730 establish a period of three business days within which the authority or public official must make a decision to accept or reject the request. If there is no ruling on the request, it is deemed rejected.

### 6.2.3 Hearing celebration

On the day of the meeting or hearing, attendees must prove their identity at the place where it is held, either with their identity card or their passport (in case the attendees are foreigners).

When a Grupo Andinas worker who was not indicated in the request attends, the authority or public official must be in charge of registering this person at the end of the hearing. Attendees are recommended to confirm their proper registration.

Attendees will try to limit themselves to discussing only those topics indicated in the hearing request, for the purposes of maintaining the principle of transparency and integrity in the actions of Grupo Andinas personnel.

### 6.2.4 Register

Once the hearing has been held, it must be registered in the Registration System for Meetings with Public Officials available on the intranet, completing the form provided for meetings with public officials. At least information should be given about the attendees, the place, the date, the topics discussed, and the decisions made. This form must be notified to the hierarchical superior and the Compliance Officer, through the Compliance Records System.

## 6.3 Facilitation Payments

Facilitation payments are understood to be those payments made to public officials to expedite routine public acts or procedures, such as visa processing, permits, customs procedures, etc.

Facilitation payments are not legal in Chile, so they are prohibited in all places and circumstances. Regarding other countries, even if permitted, Grupo Andinas workers must not make facilitation payments in the exercise of their duties.

|                        |            |   |              |           |
|------------------------|------------|---|--------------|-----------|
| <b>Status:</b>         | Approved   | <b>Name:</b><br>Procedure for Interaction with Public Officials and Lobby | <b>Type:</b> | Document  |
| <b>Version number:</b> | 07         |   | <b>Code:</b> | GA0460020 |
| <b>Effective date:</b> | 08/05/2023 |   | <b>Page:</b> | 1 of 15   |

## 6.4 Representation by third parties

In the case of hiring external third parties to interact on behalf of Grupo Andinas, for actions contemplated in Law 20,730, the due diligence process that corresponds to each case must be carried out in advance.

The relationship will be formalized in a service provision contract or other related document. In said contract, reference will be made to this Policy, the Compliance Policy, the Interaction Procedure with Public Officials and Lobby, the Crime Prevention Model and the Anti-Corruption Policy, requesting the lobbyist's commitment to the aforementioned documents.

It will be understood that any contravention of the provisions of said regulations constitutes a serious breach of the obligations of the contract, without prejudice to the civil and criminal actions that may arise from it.

Likewise, suppliers, consultants, lawyers and other third parties that represent Grupo Andinas before public authorities must commit in absolute terms, formally and in writing to act at all times against bribery and corruption, whether public or private, and in compliance of the provisions of the Code of Ethics, the Compliance Policy, the Anti-Corruption Policy, and especially, the Crime Prevention Model and this procedure

## 7. TABLE OF RECORDS

| IDENTIFICATION                        | RESPONSIBLE  | DISPONIBILITY | LOCATION  |
|---------------------------------------|--|---------------|---|
| Notes of Meeting with Public Official | Grupo Andinas worker who meets with a public official. | Digital.      | Registration System for Meetings with Public Officials. |

## 8. REPORT OF NON-COMPLIANCE

Any worker who witnesses a non-compliance with the provisions of this procedure can report it through the Grupo Andinas Complaints Channel available on Aquanet and on the company's website, or by contacting the Compliance Officer directly, or by email [compliance@aguasandinas.cl](mailto:compliance@aguasandinas.cl).

## 9. SANCTIONS

Failure to comply with this procedure may entail the sanctions provided for in the Law, individual employment contracts and in the Internal Regulations of Order, Hygiene and Safety of the company, which may range from reprimands to termination of the employment contract, or those provided for in the corporate bylaws in the case of other types of directors. In the case of suppliers and third parties, sanctions of censure in writing communicated to the supplier's administration or immediate termination of the contract with the supplier must be applied in case of serious infractions.

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

## 10. FOLLOW UP AND UPDATE

|                       |            |   |   |
|-----------------------|------------|---|---|
| <b>Printing date:</b> | 16/05/2023 | <b>Integrated Management System<br/>Andinas Group</b> |  |
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|                        |            |   |              |           |
|------------------------|------------|---|--------------|-----------|
| <b>Status:</b>         | Approved   | <b>Name:</b><br>Procedure for Interaction with Public Officials and Lobby | <b>Type:</b> | Document  |
| <b>Version number:</b> | 07         |   | <b>Code:</b> | GA0460020 |
| <b>Effective date:</b> | 08/05/2023 |   | <b>Page:</b> | 1 of 15   |

The Compliance Officer will be in charge of ensuring compliance with this procedure and will report directly to the Board of Directors and the Integrity and Compliance Committee on said compliance in his periodic report to senior management.

An internal communication channel has been set up on the intranet and via email (compliance@aguasandinas.cl) and is available to all workers to answer and resolve questions about the application of this procedure.

The Anti-Corruption Policy and this procedure will be reviewed and updated, if necessary, at least once a year.

## 11. CONTROL OF CHANGES

| <b>CONTROL OF CHANGES</b> |                |   |
|---------------------------|----------------|---|
| <b>VERSION N°</b>         | <b>DATE</b>    | <b>OBSERVATIONS</b>   |
| 00                        | August 2017    | Does not apply  |
| 01                        | August 2018    | References to positions are modified, according to the new organizational structure |
| 02                        | September 2019 | Modifications are incorporated in accordance with the new regulation of bribery.    |
| 03                        | June 2020      | Formal adjustments, as approved by the Integrity and Compliance Committee.          |
| 04                        | November 2020  | ESSAL is eliminated from Grupo Aguas and other formal adjustments.                  |
| 05                        | May 2021       | Grupo Aguas is replaced by Grupo Andinas.   |
| 06                        | May 2022       | Company name Gestión y Servicios S.A is changed to Hidrogística S.A.                |
| 07                        | May 2023       | There are no changes  |

|                 |            |  |       |           |
|-----------------|------------|--|-------|-----------|
| Status:         | Approved   | Name:<br>Procedure for Interaction with Public Officials and Lobby | Type: | Document  |
| Version number: | 07         |  | Code: | GA0460020 |
| Effective date: | 08/05/2023 |  | Page: | 1 of 15   |

**EXHIBIT I**  
**REFERENTIAL LIST OF AUTHORITIES CONSIDERED IN THE LOBBY LAW**

All those listed in articles 3 and 4 of Law No. 20,730, among which are:

1. President of the Republic.
2. Ministers.
3. Undersecretaries.
4. Ambassadors.
5. Commanders in Chief of the Armed Forces.
6. General Director of Carabineros.
7. Director General of the Investigative Police.
8. Chief and Deputy Chief of the Joint Chiefs of Staff.
9. Persons in charge of the acquisitions of the previous ones, individualized each year by resolution of the superior boss.
10. The advisors of the State Defense Council, the Directive Council of the Electoral Service, the Council for Transparency, the Council of Senior Public Management, the National Television Council, the National Institute of Human Rights.
11. The members of the Expert Panels created in Law No. 19.940 and in Law No. 20.378 and the Technical Panel created by Law No. 20.410, only with respect to the exercise of its functions.
12. Superintendent of Health Services.
13. Prosecutor of the Superintendence of Health Services.
14. Members of the Evaluation Commission of Law No. 19.886 of the Superintendency of Health Services.
15. Head of the Inspection Division of the Superintendency of Health Services.
16. Head of the Concessions Division of the Superintendency of Health Services.
17. Technical Area Inspector of the Superintendency of Health Services.
18. Heads of services.
19. Regional Directors of public services.
20. Mayors.
21. Governors.
22. Regional Ministerial Secretaries.
23. Chiefs of Staff, regardless of their form of contracting.
24. Regional councillors.
25. Mayors.
26. Councilors.
27. Executive secretaries of the Regional Councils.

|                        |            |   |              |           |
|------------------------|------------|---|--------------|-----------|
| <b>Status:</b>         | Approved   | <b>Name:</b><br>Procedure for Interaction with Public Officials and Lobby | <b>Type:</b> | Document  |
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| <b>Effective date:</b> | 08/05/2023 |   | <b>Page:</b> | 1 of 15   |

28. Directors of municipal works.

29. Municipal secretaries.