



Transformamos la energía,
en equilibrio con el planeta, para
impulsar tus proyectos y sueños.

POLICY FOR THE HIRING OF POLITICALLY EXPOSED PERSONS (PEPs)

COLBUN IS A LEADING COMPANY IN THE ENERGY MARKET. OUR PURPOSE IS TO TRANSFORM ENERGY, IN BALANCE WITH THE PLANET, TO FUEL YOUR PROJECTS AND DREAMS. THEREFORE, WE ARE COMMITTED TO MAINTAINING ETHICAL AND TRANSPARENT RELATIONSHIPS WITH ALL OUR PARTNERS AND COLLABORATORS.

THIS POLICY APPLIES TO ALL DIRECTORS, EXECUTIVES, AND EMPLOYEES OF COLBUN WHO INTERACT WITH PARTNER COMPANIES, SUPPLIERS OF GOODS AND SERVICES, FOUNDATIONS, OR OTHER PUBLIC OR PRIVATE ORGANIZATIONS OR INSTITUTIONS CONSIDERED PEPs. IT ALSO APPLIES TO ALL EXECUTIVES AND EMPLOYEES INVOLVED IN THE PROCUREMENT OF GOODS AND SERVICES, THE SELECTION AND HIRING OF PERSONNEL, AND THE ALLOCATION OF DONATIONS TO INDIVIDUALS WHO, BASED ON AVAILABLE INFORMATION, ARE CLASSIFIED AS PEPs.

GENERAL PRINCIPLES

- **Politically Exposed Persons (PEPs):** For the purposes of this policy, PEPs are those individuals identified in Section IV of Circular No. 49 issued by the Financial Analysis Unit, specifically, "Chilean or foreign individuals who hold or have held prominent public functions in a country, for at least one year after the completion of such functions."

This category includes "heads of state or government, high-ranking politicians (including members of political party leadership boards), senior government, judicial, or military officials, senior executives of state-owned companies, as well as their spouses, relatives up to the second degree of consanguinity, and individuals with whom they have entered into a joint action agreement, granting them sufficient voting power to influence companies incorporated in Chile."

For Colbun's definition of 'Politically Exposed Persons,' municipal councilors, their spouses, and relatives up to the second degree of consanguinity are also included.

- **Review and Control Process:** We have a process in place that is conducted prior to the execution of contracts, agreements, or other binding documents. This process determines whether any individuals involved in their negotiation or signing qualify as Politically Exposed Persons (PEPs). In such cases, the PEP is classified according to their level of exposure (low, medium, or high), and a differentiated approval cycle is implemented. The General Manager is responsible for approving and reporting to the Board of Directors in cases of high-level exposure. For medium-level cases, the Legal Manager, in conjunction with the Internal Audit Manager, is responsible for approval, with notification to the General Manager. For low-level cases, the Legal Manager and Internal Audit Manager are responsible for approval.

Positions considered of “High Exposure” include, for example, the President of the Republic, Ministers, and Members of Congress. On the other hand, positions of “Medium Exposure” may include Municipal Councilors and Directors of departments or divisions within ministries or public services.

Notwithstanding the above, if the engagement of a PEP is authorized, it must comply with all internal hiring policies and procedures established by the Company.

- **Report to the Board of Directors:** We are committed to submitting an annual report to the Board of Directors detailing contracts signed between Colbun and individuals classified as PEPs, including those who serve as suppliers of goods and services, employees, or donation recipients.
- **Annual Employee Declaration:** To strengthen the control environment, all Company employees must complete and/or update the annual sworn declaration of interests and related persons, disclosing any familial or other relationships with PEPs.

Jose Ignacio Escobar T.
CEO, Colbun