

We transform energy, in balance  
with the planet to fuel your  
projects and dreams

# POLICY ON INTERACTION WITH AUTHORITIES AND LOBBYING

COLBUN IS A LEADING PLAYER IN THE ENERGY MARKET, AND OUR MISSION IS TO TRANSFORM ENERGY IN HARMONY WITH THE PLANET TO POWER YOUR PROJECTS AND DREAMS. WE BELIEVE THAT TRUST IS FOUNDED ON TRANSPARENCY AND HONESTY IN OUR RELATIONS. THEREFORE, WE ARE DEDICATED TO COMPLYING WITH CURRENT REGULATIONS BY IMPLEMENTING RESPONSIBLE AND CLEAR PRACTICES IN OUR DEALINGS WITH AUTHORITIES AND PUBLIC OFFICIALS.

THIS POLICY APPLIES TO ALL COMPANY EMPLOYEES WHO INTERACT WITH AUTHORITIES, AS WELL AS TO DIRECTORS AND EXECUTIVES (HEREAFTER COLLECTIVELY REFERRED TO AS “EMPLOYEES”) WHO ENGAGE WITH PUBLIC ADMINISTRATION OR GOVERNMENT OFFICIALS ON BEHALF OF THE COMPANY.

THIS POLICY ALSO EXTENDS TO EXTERNAL CONSULTANTS WHO MAY CONDUCT LOBBYING ACTIVITIES AS DEFINED BY LAW NO. 20,730 (THE 'LOBBYING LAW').

## 1. DEFINITIONS

For the purposes of this policy and its guidelines—given the nature of the Company's business—Colbun distinguishes between two types of interactions or meetings with authorities: (a) a broader, routine type carried out by employees and external consultants, referred to as “interaction with authorities”; and (b) a more particular type that applies only to matters specifically regulated by the Lobbying Law, which requires special and additional safeguards, referred to as “lobbying and private interest management.”

- **Public Official or Authority:** Any individual who holds a public position or performs public functions, whether in Central Administration or in semi-public, municipal, autonomous institutions, or organizations created or dependent on the State, even if they are not appointed by the President of the Republic or do not receive salaries from the government. This definition also includes those elected by popular vote. It encompasses individuals involved in public functions related to the Legislative, Executive, and Judicial branches.
- **Interaction with Authorities:** Any direct or indirect interaction that an employee has with a public official or authority in the course of their duties. These interactions, which can vary in nature and are typical of the company due to its business purpose, include tasks such as processing permits, conducting inspections, performing protocol actions, granting concessions and/or operations, and holding hearings or meetings, among others.

- **Lobbying and Private Interest Management:** “Lobbying” refers to the paid activities (regulated by the Lobby Law) conducted by individuals or entities, whether Chilean or foreign, aimed at promoting, defending, or representing specific private interests to influence the decisions of authorities. If lobbying is not compensated, it is classified as “private interest management.”

The activities regulated by the Lobby Law involve efforts to influence the adoption or rejection of the following decisions:

- a. The drafting, issuance, modification, repeal, or rejection of administrative acts, draft bills and laws, as well as decisions made by authorities.
- b. The drafting, processing, approval, modification, repeal, or rejection of resolutions, statements, or decisions made by the National Congress or its members, including its committees.
- c. The execution, modification, or termination of any type of contracts entered into by authorities that are necessary for their operations.
- d. Design, implementation, and evaluation of policies, plans, and programs carried out by the authority.

Any meeting that does not aim to influence the authority in the adoption of its decisions and acts mentioned above does not need to be recorded as a lobbying or private interest management activity and is specifically governed by the following Section 2.

## 2. INTERACTION WITH AUTHORITIES

- In interactions with authorities, it is not allowed to engage in any behavior that is contrary to the law or that could be misinterpreted as an attempt to obtain improper benefits.
- It is prohibited to give, promise, or provide money, goods, hospitality, gifts, or any other favors to authorities.
- The relationship, interaction, and communication with authorities will be conducted by Company representatives who are authorized to engage with each specific entity, as far as the subject matter or the nature of the issue requires the Company’s involvement.
- Communications with authorities must be made through corporate channels. In the event of establishing contact through phone calls, WhatsApp or similar means, it is the employee's responsibility to ensure that the content of the message is clear and accurate.
- When providing information to authorities, employees or representatives of the Company must take reasonable measures to ensure its accuracy and truthfulness.
- Employees must disclose any kinship or business/commercial relationships they have with authorities, especially concerning institutions the Company interacts with. They should also avoid interacting, in the course of their duties, with authorities with whom they have a family, friendly, or business/commercial relationship.
- Any relationship with an authority that involves the Company assuming financial commitments, directly or indirectly, must be managed through processes ensuring proper separation between the employee handling the transaction and the employee

authorizing the financial flows, according to the criteria established in the Delegation of Authority (DOA). Additionally, the employee must ensure sufficient traceability of the origin and destination of the funds and disclose the nature of any contract that may exist between the parties.

- Cash or in-kind payments to authorities or state entities are strictly prohibited, except when explicitly allowed under relevant regulations for processing permits, rights, concessions, taxes, or similar procedures.

### 3. LOBBYING AND PRIVATE INTEREST MANAGEMENT

Any meeting that employees or representatives of the Company have with authorities, aimed at influencing a specific decision on administrative acts, draft laws, policy implementation, etc., and classified as lobbying or private interest management under Law No. 20,730, must, in addition to adhering to the general guidelines for Interaction with Authorities outlined in the previous section, comply with the following points:

- In meetings with authorities, it is recommended that at least two employees participate. When this is not possible, the employee should attend with an external consultant or advisor as an accompanying party.
- Meetings with authorities should be held during business hours and on business days. Additionally, they should take place either at the Company's facilities or at the offices of the public institution to which the officials belong.
- Request for Meetings and Public Registration: Meetings and hearings with authorities must be requested by employees and Company representatives using the Meeting Request Form provided by the appropriate authority.

### 4. RECORDING AND MONITORING

- The Company publishes a complete record of meetings conducted as part of activities classified as lobbying or private interest management on its website. This is done to provide transparent, relevant, and timely information regarding the company's activities in this area.
- The Company has a monitoring process to ensure compliance with regulations and internal policies regarding lobbying or private interest management meetings that Colbun holds with authorities and that are recorded. This process aims to identify and mitigate risks that could affect transparency and corporate ethics.
- Representation by Third Parties: External advisors or lobbyists hired to represent the Company in activities covered by Law No. 20,730 must adhere to the guidelines established in this policy. Additionally, the relationship with external advisors or lobbyists must be formalized through a service agreement or a similar document.

**Jose Ignacio Escobar T.**

CEO of Colbun