



**MANUAL OF THE
CRIME PREVENTION MODEL**

**LAW No. 20.393 ON THE CRIMINAL LIABILITY OF LEGAL
ENTITIES**

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1. OBJECTIVE

The purpose of this manual is to document the elements that make up the Crime Prevention Model (CPM) established by AES Andes S.A. (hereinafter, "AES", the "Company" or the "Corporation") and all its subsidiaries in Chile, in accordance with Law No. 20.393, which establishes the Criminal Liability of Legal Entities and its amendments incorporated through Law No. 21.595, the Law on Economic and Environmental Crimes (hereinafter collectively referred to as the "Law").

The purpose of the Crime Prevention Model (hereinafter "CPM") is to establish an appropriate form of organization, to the extent required by the corporate purpose, size, complexity, resources, business, and usual or sporadic activities, for the prevention of the crimes included in the catalog of the Law (hereinafter, the "Crimes").

The design and implementation of the CPM demonstrate the Company's organizational commitment to prevent and thus avoid the commission of Crimes, hindering and preventing the perpetration of acts that could pose risks for AES to be exposed to criminal liability, in accordance with the provisions of the Law. For the same reason, the CPM is a testament that, in the event that Company workers commit any of the offenses established, this occurs in contravention of AES's corporate integrity culture.

To avoid and prevent the commission of Crimes, the Company, through the CPM, identifies, quantifies, and controls the risks within the framework of its activity, that is, inherent to its business and operation. Likewise, the CPM focuses on the timely detection of these risks and the continuous improvement of the respective processes, thus mitigating the likelihood of the risk of committing Crimes.

Through the design, implementation, and effective supervision of the CPM, the Company seeks to prevent any illicit act from being committed within the framework of its activity by or with the intervention of any natural person holding a position, function, or position in the Company, or by third parties providing services to AES as a result of managing its affairs with third parties, whether with or without representation of the Company.

2. SCOPE

The CPM applies to AES Andes S.A. and all workers holding a position, function, or position in the Company, even if their contractual relationship is temporary, such as interns. It will also apply to all persons providing services managing AES's affairs with third parties (hereinafter collectively referred to as "Collaborators").

Similarly, to ensure compliance with the CPM by suppliers and service providers or third parties interacting with the Company, AES will ensure its dissemination and application in all its relationships with third parties in the course of its business and activities.

3. LEGAL FRAMEWORK

The Law has established a broad catalog of crimes that can generate corporate criminal liability. Nevertheless, considering that the objective of prevention is to avoid the commission of Crimes to which the Company has some level of exposure, the following concepts are explained to aid in understanding this Manual:

3.1. Crimes: The catalog of crimes contemplated by Law No. 20.393, amended by the Law on Economic and Environmental Crimes, addresses four categories of conduct for which a Company can be held responsible. The first category relates to crimes that, by their nature, must always be considered economic (crimes against the Securities Market, banking crimes). The second category includes economic crimes committed in the exercise of a position, function, or position in a company, or for economic or other benefits for it. The third category relates to crimes that affect the environment and have a significant economic impact, and the fourth category includes other crimes related to money laundering. To effectively prevent the risks to which the Company is exposed, this CPM has been structured around "Risk Areas," in which various behaviors that could potentially constitute offenses in the context of the organization are deployed.

3.2. Risk Areas: There are risks for the Company in the following areas or operational spaces:

- Risks in interaction with public officials or authorities;
- Risks in corporate governance management;
- Risks in relationships with suppliers, contractors, or other service providers;
- Risks in relationships with customers, communities, competitors, and other third parties;
- Risks in fund management and corporate asset administration;
- Risks in tax management;
- Risks in environmental management;
- Risks in the management of donations, gifts, and other gratuities;
- Risks in hiring and developing labor relations;
- Risks to the health and physical safety of individuals;
- Risks in system management and use;
- Risks in the management and use of equipment, devices, and fixed assets;
- Risks in the management of intellectual and industrial property matters.

3.3. Compliance Officer: The person designated within the Company to ensure the

application, operation, monitoring, and updating of the Crime Prevention Model designed and implemented by AES to avoid and prevent the commission of Crimes.

4. CRIME PREVENTION MODEL

4.1. Basic Concepts

The CPM establishes an organizational structure, resources, guidelines, roles and responsibilities, processes, and procedures aimed at preventing the commission of Crimes, as well as their detection and mechanisms for continuous improvement. The responsibility for implementing and maintaining the CPM lies with the Board of Directors, the General Manager, and the Company's Compliance Officer, as well as each of the Responsible Parties (hereinafter, "Responsible Parties") who must verify the proper implementation and compliance with the CPM.

According to the provisions of the Law, the adopted CPM considers the following elements:

- (i) Identification of AES activities or processes that may involve risks of Crimes;
- (ii) Establishment of protocols and procedures to prevent and detect Crimes in the context of activities defined in the Risk Areas. These procedures include, among other elements, secure reporting channels and internal sanctions for non-compliance, as well as effective communication mechanisms to all Collaborators, including top executives;
- (iii) Assignment of Responsible Parties for the application of protocols. These Responsible Parties, for the exercise of the obligations entrusted by this CPM, will have independence and effective powers of direction and supervision, as well as direct access to the AES Board of Directors to inform it promptly of compliance with such obligations; and
- (iv) Provision for periodic evaluations by independent third parties and mechanisms for improvement or updating based on their evaluations.

4.2. Environmental Regulation Especially Applicable to AES

One of the main innovations of the Law is the new system of environmental crimes introduced by the regulations, which consists of new criminal figures aimed at protecting various natural environmental components (water, soil, and air), animal and plant health, water resources, potable water supply systems, wetlands, areas under official protection, and glaciers. Both these new figures and those crimes that, prior to the enactment of the Law, referred to the protection of environmental components, are considered economic crimes and can result in criminal liability for legal entities. Given its productive activity, AES is a company with significant exposure to environmental matters.

The Company is one of the leading energy generation companies in Chile, implementing new renewable generation projects in various parts of the country. Considering its industry, AES is exposed daily to environmental challenges.

Due to AES's constant concern regarding the management of its environmental risks, the Company considers the modifications implemented by the Law in this area to be particularly relevant. In this context, the first and most significant modification of the Law in environmental matters corresponds to the creation of new criminal figures previously mentioned. Indeed, the innovations of the new regulation in this regard are reflected in two distinct orders: **(i)** the creation of a new title in the Penal Code, called "Attacks against the environment"; and **(ii)** the integration of new criminal types in Law 20.417, called the "Law that creates the Ministry of the Environment, the Environmental Evaluation Service, and the Environmental Superintendence."

4.2.1. New Environmental Crimes within the Title of “Attacks against the Environment”¹

The new title incorporated into the Penal Code considers the crimes of evasion, contravention of environmental regulations, extraction of water in violation of distribution and use rules, serious impact on environmental components, and impact on areas under official protection.

The crime of evasion is incorporated through Article 305 of the Penal Code and sanctions those who, being obliged to subject their activity to an environmental impact assessment, knowingly fail to comply with this obligation, constructing or operating a project in which a polluting activity is carried out, understood as: (i) discharging pollutants into water bodies; (ii) extracting water; (iii) discharging or depositing pollutants into the soil or subsoil; (iv) discharging soil or solids into wetlands; (v) extracting components from the soil or subsoil; or (vi) releasing pollutants into the air.

The crime of contravention of environmental regulations and contumacious behavior is incorporated through Article 306 of the Penal Code and sanctions those who, having authorization to discharge, release, or extract any of the elements mentioned in the preceding paragraph, engage in the same polluting behaviors indicated for Article 305 of the Penal Code, as a result of a contravention of: (i) an emission or environmental quality standard; (ii) a prevention plan; (iii) a decontamination or environmental management plan; (iv) an Environmental Qualification Resolution or its approval conditions. This is provided that the company has been administratively sanctioned in at least two different sanctioning procedures for serious or very serious violations concerning the same auditable unit, in the last 10 years, counted from the occurrence of the polluting behavior.

The crime of extraction of water in violation of distribution and use rules is incorporated through Article 307 of the Penal Code and sanctions those who, having authorization to extract continental, surface, or underground waters, proceed to extract them in violation of distribution and use rules, provided that the respective extraction is carried out intentionally in any of the following circumstances: (i) the temporary reduction of the exercise of the respective use rights has been set by the environmental authority, directly or indirectly; or (ii) in an area declared with a prohibition for new water extractions; an area declared a restriction area of the hydrogeological sector, an area declared with depletion of natural water sources, or an area declared as a water scarcity area.

The crime of serious impact on environmental components is incorporated in Article 308 of the Penal Code and sanctions those who, discharging or releasing pollutants or extracting water or soil components, seriously affect maritime or continental waters, soil or subsoil, air, animal or plant health, the existence of water resources, potable water supply, or wetlands. It should be noted that the cited Article 308 considers all the behaviors indicated above, if they are carried out intentionally. However,

¹ New Provisions 305 to 310 of the Chilean Penal Code.

if the behaviors described are not carried out intentionally but negligently, it would still be considered an economic crime as it is sanctioned in that sense under Article 309 of the Penal Code.

The crime of serious impact on areas under official protection is incorporated in Article 310 of the Penal Code and sanctions those who affect the environmental components of protected areas, if it is a virgin region reserve, a national park, a natural monument, national reserves, wetlands, or glaciers.

For the purposes of the crimes established in Articles 308, 309, and 310, the law understands "serious impact" as the adverse change produced in the previously indicated components, provided that the change meets any of the following criteria: (i) has significant spatial extension; (ii) has prolonged effects over time; (iii) is irreparable or difficult to repair; (iv) affects a significant set of species; (v) impacts extinct, endangered, or vulnerable species; (vi) poses a risk of serious harm to human health; or (vii) significantly affects the services or functions of the affected environmental component.

4.2.2. New Environmental Crimes considered within Law No. 20.417²

The new crimes considered by Law No. 20.417 are integrated by two criminal figures that sanction the provision of false information to the environmental authority (in the context of an environmental assessment process and to prove compliance with environmental obligations), a crime of fragmentation either to evade or vary the instrument of entry into the Environmental Impact Assessment System, a crime of disobedience to closure sanctions or measures to halt an activity, and a crime of significant obstruction of environmental oversight activities.

The crime of providing and presenting false or incomplete information to the environmental authority is incorporated in Article 37 bis letters a) and c) of Law 20.417 and sanctions those who: (i) in the context of an environmental assessment process, maliciously present information that hides, mitigates, alters, or diminishes the environmental effects of the project submitted for environmental assessment; or (ii) maliciously present false or incomplete information to the Environmental Superintendence to prove compliance with obligations imposed by any environmental management instrument under the competence of said superintendence.

The crime of fragmentation is incorporated in Article 37 bis letter b) of Law 20.417 and sanctions those who maliciously fragment their projects or activities to evade the environmental impact assessment system.

Then, Article 37 ter, letter b) of Law 20.417, sanctions those who: (i) fail to comply with closure sanctions imposed by the Environmental Superintendence or other measures imposed by said superintendence, or (ii) significantly impede or obstruct the oversight activities of the Environmental Superintendence.

All these behaviors are criminally sanctioned provided they are committed intentionally.

4.2.3. Other relevant Environmental Crimes

² Law that creates the Ministry of the Environment, Environmental Assessment Service, and the Superintendency of the Environment.

In addition to the cases mentioned above, the Law considers other environmental offenses that, although they existed before the new regulations, are now elevated to the status of economic crimes. Among others, the following are considered economic crimes: (i) crimes of fire, management, and propagation of fire (Articles 18, 21, 22, 49, and 50 of the Forest Law); (ii) crimes of contamination of water bodies and impact on hydrobiological resources (Articles 64, 120, 135, and 136 of the General Law on Fisheries and Agriculture); (iii) crimes of hunting wild fauna species (Articles 29, 39, and 31 of the Hunting Law); (iv) crime of impacting national monuments (Article 38 of the National Monuments Law); (v) crime of water usurpation (Articles 459 and 460 of the Penal Code); (vi) crime of illegal handling and trafficking of hazardous waste (Article 44 of Law No. 20.920); (vii) crime of improper propagation of contaminating elements generating risk to animal or plant health or the population's supply (Article 291 of the Penal Code), among others.

All the regulations detailed above, both new crimes and those elevated to the status of economic crimes, are relevant to AES as an energy company, considering that its projects have a potential environmental impact and must comply with the applicable environmental regulations according to the nature and scope of its various projects.

Consequently, the implementation of the CPM must particularly consider the environmental scope, particularly regarding the management, detection, response, and monitoring of potential environmental risks applicable to AES, which must be prevented according to the guidelines of this CPM. The emphasis on these risks must also be followed by AES workers and, in general terms, by all people representing the company's interests before third parties, as it is one of the most sensitive areas that the CPM seeks to prevent.

5. RESPONSIBLE PARTIES

The Responsible Parties will be the individuals responsible for ensuring the adoption, compliance, and continuous implementation of the CPM concerning the risks inherent to their area of competence.

5.1. Means, Power, and Attributions of the Responsible Parties

The CPM ensures that the Compliance Officer and other Responsible Parties are provided with the means and material and immaterial resources, as well as the establishment of obligations and granting of powers to carry out their duties.

Additionally, the Compliance Officer, as the main person responsible for the CPM, will also have:

- (i) Functional autonomy in their role to fulfill the obligations entrusted to them and report on their management to the Board of Directors. For these purposes, they may access and report directly to the Board of Directors and the General Manager to inform them of their findings and account for their management.
- (ii) Resources established in their own and sufficient annual budget to carry out the activities entrusted for the fulfillment of the CPM and perform the necessary audits and improvements.
- (iii) Unrestricted access to all the information necessary for the proper performance of their duties, with the obligation to maintain confidentiality.

(iv) Necessary and adequate physical infrastructure to properly carry out their work and maintain the confidentiality of their findings.

(v) Necessary and sufficient technological infrastructure to carry out their tasks, which must guarantee a high level of physical and logical security of the network in which it operates to safeguard the confidentiality of the information; and,

(vi) A trained, competent, and experienced team for the proper fulfillment of their duties and obligations.

On the other hand, both the Compliance Officer and the other Responsible Parties must:

(i) Ensure the effective implementation of the CPM, its adequacy, and its updating.

(ii) Suggest, develop, and implement, in their respective areas or with the process owners, those policies, procedures, and/or activities they deem necessary to complement the CPM.

(iii) Support the process of periodic evaluations of the CPM carried out by independent third parties and follow up on the recommendations or action plans arising from such process, as appropriate.

(iv) Execute the controls for which they are responsible according to the Risk Matrix, and document and safeguard the evidence related to them; and,

(v) Implement action plans to address the gaps detected in audits or investigations related to the CPM.

5.2. Responsible Parties

5.2.1. Compliance Officer (CO)

The CO is the person specifically designated by the Board of Directors to, together with the General Manager and other Responsible Parties, design, implement, and supervise the CPM. The designation of the Compliance Officer will be made by the Board of Directors and will remain in the office indefinitely, unless otherwise decided.

The CO will have direct access to the Board of Directors and the General Manager to report on the measures and plans implemented and account for their management. Additionally, annually, the AES Board of Directors must approve the budget presented by the CO to have the necessary material means to fulfill their functions.

Their functions, powers, and obligations will fundamentally consist of:

- i. Requesting the AES Board of Directors the means, resources, and powers necessary to fulfill their functions.
- ii. Reporting semi-annually or when circumstances warrant it to the Board of Directors, through reports that should include conclusions and action plans regarding the execution of prevention, detection, response, supervision, and updating activities of the CPM. For the preparation of these reports, they may rely on other Responsible Parties or external third parties.
- iii. Periodically reporting to other Company bodies on metrics related to CPM compliance.

- iv. Requesting the corresponding areas the records or evidence of compliance and execution of the controls under their charge; identifying gaps and coordinating with them action plans to overcome them. For these purposes, they may rely on the management of each Responsible Party.
- v. Reviewing, annually or when circumstances warrant it, the activities or processes of the Company in which the risks of committing Crimes are generated or increased.
- vi. Leading the process of periodic evaluations of the CPM carried out by independent third parties and executing, together with the other Responsible Parties, the follow-up of the recommendations or action plans that arise from such process.
- vii. Executing the controls under their charge and documenting and safeguarding the evidence related to them.
- viii. Receiving and investigating complaints for cases of CPM violations or Crimes committed within the Company.
- ix. Proposing updates to the CPM to the Board of Directors when new crimes are incorporated into the Law or when circumstances require it.
- x. Keeping the CPM Risk Matrix updated.
- xi. Periodically evaluating the effective application of the CPM through internal or external audits to verify CPM compliance and participating in the design and implementation of action plans for detected gaps.
- xii. Designing and implementing, with the support of the Human Resources area, a training and communication program for CPM compliance, aimed at all Company employees.
- xiii. Ensuring that publicly accessible CPM information for Collaborators is updated and that the complaint channel is operational; and,
- xiv. Advising and resolving queries from Collaborators or related areas on any aspect related to crime prevention.

5.2.2. Other Responsible Parties

The Responsible Parties listed below are the individuals who lead each area of the Company that has some relevant associated risk.

Finance. Specific obligations include:

- i. Developing policies, procedures, or protocols related to the administration of financial resources to prevent their use in committing Crimes.
- ii. Developing a system of controls associated with financial resources together with the CO to prevent their use in acts that could constitute any of the Crimes.
- iii. Keeping accounting records and other financial and tax documentation of the Company in accordance with the law, in an integral, complete, and secure manner.

- iv. Keeping a record of all donations or contributions made by the Company and informing the CO about them when requested; and,
- v. Providing the information required by the CO for the performance of their respective functions in relation to the CPM.

Information Technology. Specific obligations include:

- i. Developing policies, procedures, or protocols related to information security, system use, user and password management, and software development.
- ii. Incorporating reviews of processes related to cybersecurity and information technology, including access control to platforms and IT systems used by the Company, into the annual audit plan.
- iii. Receiving and investigating complaints related to information security and/or cybersecurity; and,
- iv. Providing the information required by the CO for the performance of their respective functions in relation to the CPM.

Human Resources. Specific obligations include:

- i. Including compliance clauses of Law No. 20.393 in employment contracts.
- ii. Including in job descriptions the specific obligations that individuals must fulfill in the exercise of their position to prevent the commission of Crimes.
- iii. Including the obligations, prohibitions, and internal sanctions related to the CPM in the Company's Order, Hygiene, and Safety Regulations (RIOHS).
- iv. Including matters related to the CPM and its Crimes in the training and induction programs provided to employees.
- v. Including matters related to the CPM and its Crimes in relevant communication actions.
- vi. Supporting the training and dissemination activities of the CPM, being responsible for maintaining evidence of attendance records and the delivery of communications specifically prepared for this purpose to employees.
- vii. Providing the information required by the CO for the performance of their functions in relation to the CPM; and,
- viii. Advising the CO on procedural and consistency requirements for the issuance of internal regulations necessary to effectively implement the CPM.

Occupational Health and Safety. Specific obligations include:

- i. Supervising compliance with the controls defined for the prevention of occupational accidents that may affect the Company's internal personnel (e.g., provision of Personal Protective Equipment).

- ii. Supporting the development of strategies for continuous monitoring and supervision of controls defined for the prevention of occupational accidents that may affect contractors and subcontractors (e.g., supervision of the proper use of Personal Protective Equipment).
- iii. Ensuring the development of maintenance activities for the Company's equipment and assets, as well as the development of regular operations at AES facilities.

Environment. Specific obligations include:

- i. Ensuring compliance with all applicable environmental laws and regulations for the Company's operations. This includes monitoring sectoral and legal requirements related to the environment.
- ii. Ensuring that the Company has all the necessary permits and licenses to operate legally. This involves obtaining, renewing, and keeping all documents required by the relevant authorities up to date.
- iii. Implementing internal controls to ensure that all Company activities are carried out in an environmentally responsible manner. This necessarily includes managing all risks identified in the Company's risk matrix, as well as other instruments required by the authority and the law.
- iv. Ensuring the establishment of an environmental monitoring system to regularly assess the impact of the Company's operations on the environment. This involves continuous monitoring of emission measurements, water quality, waste management, among other aspects relevant to the operation.
- v. Ensuring the submission of periodic reports with truthful information to the competent authorities. These reports may include data on emissions, discharges, waste management, among other environmental aspects relevant to the operation.
- vi. Supporting and providing information required for the development of periodic internal audits to assess compliance with the Company's environmental policies and procedures.
- vii. Collaborating with environmental, sectoral authorities, and other stakeholders, such as local communities and environmental organizations, to ensure a comprehensive approach to environmental management and prevent potential environmental crimes.
- viii. Providing the information required by the CO for the performance of their functions in relation to the CPM; and,
- ix. Advising the CO on procedural and consistency requirements for the issuance of internal regulations necessary to effectively implement the CPM.

Regulatory Affairs. Specific obligations include:

- i. Ensuring compliance with all applicable environmental and sectoral laws and regulations for the Company's operations. This includes monitoring sectoral and legal requirements related to the business.
- ii. Ensuring that the Company has all the necessary permits and licenses to operate legally. This involves obtaining, renewing, and keeping all documents required by the relevant authorities up to date.

- iii. Ensuring the submission of periodic reports with truthful information to the competent authorities.
- iv. Supporting and providing necessary information for the development of periodic internal audits to assess the management of permits and other sectoral requirements of the Company.
- v. Collaborating with environmental and sectoral authorities, and other stakeholders, such as local communities and organizations, to ensure a comprehensive approach to the Company's management.
- vi. Providing the information required by the CO for the performance of their functions in relation to the CPM; and,
- vii. Advising the CO on procedural and consistency requirements for the issuance of internal regulations necessary to effectively implement the CMP.

Legal Affairs. Specific obligations include:

- i. Advising on the content of compliance clauses of the Law that should be included in contracts with suppliers of goods and services.
- ii. Including compliance with clauses of Law No. 20.393 in service contracts with third parties.
- iii. Providing reports to the EPD related to lawsuits or any legal and/or administrative action in which the Company is a party, if they are related or may be related to anti-corruption laws or the CPM itself, such as laws 20.393 and 21.595.
- iv. Providing the information required by the CO for the performance of their functions in relation to the CPM; and,
- v. Advising the CO on procedural and consistency requirements for the issuance of internal regulations necessary to effectively implement the CPM.

Corporate Affairs and Sustainability. Specific obligations include:

- i. Ensuring the establishment and maintenance of positive relationships with the communities where the Company operates.
- ii. Keeping a record of authorizations and motivations for the provision of financial or in-kind contributions to third parties, such as non-profit organizations, educational institutions, or community projects, so that these contributions are made transparently, ethically, and in line with the Company's values and sustainability objectives.
- iii. Ensuring the maintenance of fluid and transparent communication with the relevant governmental and regulatory authorities. This includes providing truthful, timely, and complete information.
- iv. Ensuring that, in the processes of information disclosure, the information is complete and accurate about the Company's performance, as well as responding promptly and adequately to stakeholders' concerns and questions.
- v. Participating in and ensuring the establishment of risk management policies and procedures, as well as actively seeking opportunities to generate shared value with stakeholders.

- vi. Providing the information required by the CO for the performance of their functions in relation to the CPM; and,
- vii. Advising the CO on procedural and consistency requirements for the issuance of internal regulations necessary to effectively implement the CPM.

5.2.3 Other Key Members for the Proper Compliance of the CPM

Board of Directors. Specific obligations include:

- i. Designating and/or removing the CO from office.
- ii. Providing the necessary means and resources for the Responsible Parties to fulfill their duties.
- iii. Approving the Company's CPM and its future updates.
- iv. Ensuring the correct implementation and effective operation of the CPM.
- v. Receiving the CO's management report and accountability semi-annually.
- vi. Informing the CO of any observed situation related to Crimes; and,
- vii. Instructing the CO or other Responsible Parties to provide informative reports to other Company bodies on metrics related to the CPM.

General Manager. Specific obligations include:

- i. Ensuring the correct implementation and effective operation of the CPM, and its permanent adequacy and updating, together with the Board of Directors.
- ii. Informing the CO of any observed situation related to Crimes.
- iii. Supporting the CO's management by ensuring unrestricted access to the information and people necessary for the development of prevention, detection, response, monitoring, and continuous improvement activities of the CPM.
- iv. Contributing to the dissemination of the CPM by generating and participating in communication, training, and awareness actions, to establish a culture of compliance and integrity starting from the Company's top leader; and,
- v. Instructing mandatory participation in CPM-related training.

Employees. Specific obligations include:

- i. Complying with the provisions of the clauses related to the Law present in the respective contracts they sign.
- ii. In the case of Company employees complying with the RIOHS, as well as the rest of AES's internal regulations.
- iii. Participating in training developed within the framework of crime prevention.

- iv. Informing and consulting or reporting, through the complaint and consultation channel, about situations that could go against current legality and/or the Company's internal policies.

6. ACTIVITIES OF THE CRIME PREVENTION MODEL

The CPM is developed through four types of activities that aim to materialize its operation and execution. These activities are:

6.1. Prevention Activities

The objective of these activities is to prevent non-compliance with the CPM and its related policies and procedures, to prevent the commission of Crimes. These activities consist of:

6.1.1. Training and Communications

For an effective implementation of the CPM, it is essential that all Employees are aware of the scope of the Law, as well as the content and scope of application of the CPM, its controls, and its procedures. To ensure that all Collaborators are properly informed, in addition to the provisions incorporated in their employment contracts, the RIOHS, and the Company's Code of Conduct, the Compliance Officer - together with the Company's Human Resources area - will ensure the following:

- (i) The construction, formalization, and implementation of a mandatory annual training plan regarding the CPM and the Law, either in-person or via remote education through audiovisual means (hereinafter, "e-learning"). The Human Resources area must keep records of the attendees at the training sessions, duly signed by the participants if in-person and/or proof of registration if via e-learning.
- (ii) The training of personnel in entry and exit areas, or those responsible for attending to public officials and inspectors, on how to act in the face of inspections by the authority and who to contact.
- (iii) The inclusion of matters related to the CPM in induction programs for new employees and/or those assuming new positions of responsibility.
- (iv) The implementation of communications and training sessions specifically designed for the Company's suppliers and contractors, disseminating the main aspects and requirements of the CPM; and,
- (v) The dissemination and training regarding the reporting system and its essential characteristics, with special emphasis on the guarantee of confidentiality, confidentiality, and non-retaliation.

6.1.2. Risk Diagnosis and Analysis

The Compliance Officer is responsible for the process of identifying, analyzing, and evaluating the risk of committing Crimes, with the support of the Responsible Parties and external experts in the field. These risks must be reflected in a matrix (hereinafter the "Risk Matrix") that must be reviewed

at least once a year or when significant changes occur in the regulation or in the Company's structure, processes, or business. For the preparation and updating of the Risk Matrix, the methodology used by the Company must be employed. The probabilities of occurrence and impact will be weighed up to determine the level of risk severity, which is called "inherent risk." The described risk diagnosis must be carried out in a risk identification process that requires the participation of various areas of the Company, with whose collaboration the Compliance Officer must prepare, and if necessary, update, the processes in which there may be a risk of committing Crimes. This process will consist of the following stages:

(i) Risk Identification. The determination of the Company's activities and processes exposed to the risk of committing Crimes, as well as the exposed positions, will be carried out through interviews with the employees in charge of the Company's processes that can be reasonably anticipated as risky.

(ii) Risk Assessment. The identified risks must be evaluated for prioritization to identify the processes with the highest exposure and focus the efforts and resources of the Compliance Officer and the Company, using the current risk methodology as a reference.

(iii) Identification and Evaluation of Controls. Once the risks are detected, the existing control activities in the Company aimed at mitigating them must be identified. This will be done through working meetings with participants from various areas and functions within the Company, obtaining control activity and evidence of its existence. Subsequently, its design must be evaluated in relation to the reasonable mitigation of the risk of the Crimes to which they apply. This evaluation must be carried out by the Compliance Officer together with the responsible area or process owner and with the support of the corresponding Responsible Parties. To evaluate the design of each control, the following elements must be considered and analyzed to determine if, together, they reasonably mitigate the materialization of the associated inherent risk:

- Type of control: Preventive/Detective/Corrective.
- Category: Manual/Automatic/Mixed.
- Evidence: Documented/Not documented
- Identification of responsible execution: Yes/No; and,
- Frequency: Scarce/Recurrent/Periodic.

Based on this form of evaluation, the Compliance Officer and the responsible area or process owner must estimate the degree of mitigation of the inherent risk according to the effectiveness of the controls, procedures, and policies, all with the support of the Responsible Parties.

The definitions of the indicated elements, as well as the estimated degree of control mitigation, will be established in the Risk Matrix.

6.1.3. Execution of Preventive Controls

The execution or implementation of the controls associated with the processes and subprocesses identified in the Risk Matrix will correspond to the responsible parties of those processes and subprocesses, with the support of the corresponding Responsible Parties. Therefore, it will be

necessary to clearly identify who these responsible parties are since, additionally, they must report on the effectiveness of the controls or the need for adjustments and improvements.

The effectiveness of the CPM depends mainly, although not exclusively, on the existence of a control environment within the Company. A manifestation of the control environment is the legal and labor instruments that the Company must develop to concretize the CPM in its relationship with the Employees, formally informing them of the obligations they must comply with in accordance with it. This includes, but is not limited to:

- (i) Inclusion of clauses related to compliance with the Law in employment contracts, as well as specific responsibilities in each position.
- (ii) Inclusion of a section or chapter related to compliance with the Law in the Company's RIOHS, which must be received by the Collaborators at the time of hiring or whenever it is modified; and,
- (iii) Inclusion of clauses related to compliance with the Law in contracts with third parties acting on behalf of the Company, whether they do so with or without representation, and with suppliers of goods and services.

6.2. Detection Activities

The objective of detection activities is to timely discover cases that may mean non-compliance or violations of the CPM's policies and procedures, as well as indications of acts that may mean the commission of Crimes.

6.2.1. Audits of Processes and Financial Resources

The Compliance Officer must coordinate periodic reviews of the financial resource management procedures and other Company processes, either by themselves, with the support of an organization member, or through the hiring of external third parties. The Compliance Officer, together with the Company's Administration and Finance, and Accounting and Tax areas, must develop action plans to overcome the detective gaps.

The results of these audits must be incorporated by the Compliance Officer in all the reports that they must make to the Board of Directors and the determined bodies.

6.2.2. Review of Legal Proceedings

The Compliance Officer must prepare and present semi-annual reports to the Board of Directors and the General Manager regarding legal proceedings or any legal and/or administrative action in which the Company is a party, if they are related or may be related to the Law in matters of Compliance, such as Laws 20.393 and 21.595.

6.2.3. Reporting and Inquiry Channel (AES Helpline)

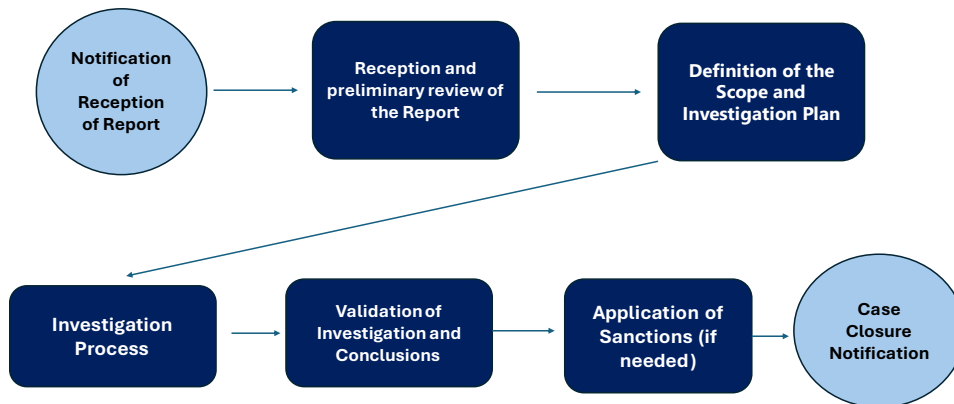
Every Worker of the Company who witnesses or becomes aware of any situation that may mean non-compliance with the Code of Conduct, the Company's internal regulations, or current legislation will have the obligation to report it. Reports will be managed and investigated seriously and in accordance with the provisions of the Internal Order, Hygiene, and Safety Regulations and in accordance with the investigation protocols required by the regulations, protecting the fundamental rights of the employees. The Company will not retaliate against individuals who make reports in good faith. In this way, and in line with the provisions of AES's Anti-Corruption Policy, the Company has various reporting channels, including:

- Direct contact with the Compliance Officer or any other member of the organization, who must channel the information to AES's Compliance and Ethics department.
- Helpline on the website www.aeshelpline.com
- By phone at 800 360 312 and then dial 800 505 7319.

6.2.4. Internal Investigations

The Compliance Officer will be responsible for investigating the report related to the crimes of Law No. 20.393, 21.595, or any similar matters or assigning it to an investigator who will substantiate the case according to a general investigation procedure. The Compliance Officer will receive all inquiries, refer to them, and monitor that they are responded to in a timely manner.

For these purposes, the following process will flow as followed:



6.3. Response Activities

The objective of these activities is to manage the consequences of non-compliance with the CPM, its related policies and procedures, or the possible commission of any of the Crimes. Response activities, therefore, may be aimed at preventing a recurrence of an infraction or non-compliance, on the one hand, and sanctioning the offender, on the other.

Among the response activities, it is possible to distinguish:

6.3.1. Action Plans

The Compliance Officer must review the breached control activities, identify the cause of the failure, and develop action plans together with the affected area and the responsible or process owner, to achieve greater control effectiveness in the future. Additionally, the Compliance Officer must reassess the degree of mitigation of the inherent risk after the breach of control.

6.3.2. Disciplinary or Corrective Measures

Within the limits of labor legislation, the Company may apply disciplinary measures to employees who violate the CPM, its policies and procedures, or are found responsible for committing any of the Crimes, upon conclusion of the corresponding investigation. The sanctions that the Company can apply are:

- (i) Verbal warning.
- (ii) Written warning, in case of recurrence.
- (iii) Written warning, recorded in the employee's file and reported in writing to the Labor Authority.
- (iv) Fine up to a maximum of 25% of the employee's daily salary.
- (v) Termination, in the most serious cases

Additionally, other corrections may be applied, such as mandatory attendance or participation in specially designed training sessions. Sanctions will be applied proportionally to the severity of the proven infraction through the defined investigation procedure, and for their determination, the recurrence of the offender, their previous conduct, as well as their position and/or responsibility must also be considered. In any case, the disciplinary measures to be imposed must always comply with the following:

- (i) They must be contained in the RIOHS (Order, Hygiene, and Safety Regulations) prior to the occurrence of the events; and (ii) They must be applied to all employees who participated in the sanctioned events.

6.3.3. Record of Reports and Sanctions related to the CPM

The Compliance Officer must keep their own record of the reports received related to the Law, their resolution, and the applied sanction, if any.

6.3.4. Reports to Justice

The Compliance Officer, together with the Vice President of Legal Affairs, may evaluate informing any situation they become aware of because of an internally received report to the Courts of Justice, Public Prosecutor's Office, or Police, as they deem appropriate. In this regard, it is necessary to

consider that Law No. 20.393 establishes as a mitigating circumstance of the criminal liability of the legal entity substantial collaboration in clarifying the facts.

For these purposes, it will be understood that the legal entity substantially collaborates when, at any stage of the investigation or judicial procedure, its legal representatives have informed the authority of the punishable act or have provided evidence to establish the investigated facts.

6.4. Monitoring and Updating Activities

The objective of these activities is to supervise and verify the proper functioning of the CPM and the defined control activities. These are:

6.4.1. Monitoring the Crime Prevention Model

(i) The Compliance Officer will develop a monitoring plan for the various aspects of the CPM, which can be carried out directly or through independent third parties and also agree on aspects to be reviewed by internal auditors in their annual plan, which will be communicated to the Board of Directors within their annual work plan for approval. Audits of financial resource management must be part of this plan; and,

(ii) The action plans resulting from the audits must be defined by the Compliance Officer.

6.4.2. Update of the Crime Prevention Model

To update the CPM, the Compliance Officer must consider, among other circumstances, the following:

(i) New regulations applicable to the Company.

(ii) Significant changes in the Company's structure, businesses, or markets in which it operates; and,

(iii) Effectiveness of the action plans implemented in controlling or reducing risks.

Considering the above, the Compliance Officer must review the Risk Matrix, the controls associated with the CPM, and its policies and procedures at least once a year.

6.4.3. Periodic Evaluations of the CPM by Independent Third Parties

The Law establishes that the CPM must be periodically evaluated by an independent third party, to verify its proper adoption and implementation, incorporating the relevant improvements. The Compliance Officer will be responsible for ensuring that the Company has these processes periodically.

Additionally, they must ensure that action plans are generated for all detected gaps before the issuance of the compliance report delivered by the third parties, because of their evaluations.

7. RECORD KEEPING

The Compliance Officer (CO) and each Responsible Party are required to record in the system provided by the Company any documentation that reflects decisions related to the design and implementation of the Crime Prevention Model (CPM). They must also keep records of the follow-up and audit reports issued in relation to the CPM. The destruction of this documentation can only proceed with prior authorization from the Company's Board of Directors, and the reasons for such a request must be justified, with the prior opinion of the CO. The disappearance or destruction of all or part of these records without proper authorization will be considered a serious breach of the duties imposed by the CPM on the Responsible Parties or any person responsible for keeping these records, and it could even constitute one of the Crimes in the catalog.

Additionally, the CO will ensure that a record is kept of all documentation that demonstrates the Company's commitment to the effective implementation of the CPM, such as minutes, internal communications, statements, speeches, and presentations, among others.

8. VERSION CONTROL

Date	Version	Responsible	Review	Approval
September 2024	v.1	Patricia Estrada	María Paz Cerda	Board of Directors