



<b>CLARO TRANSPARENCY AND BUSINESS ETHICS PROGRAM (PTEE) MANUAL</b>		
Belongs to the process: Manage Risk and Business Continuity	Date: 23-Dec-25	
Classification: Internal Use.	Version: 6	Code <b>GRI117</b>

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## Objective

Describe the necessary steps along with the requirements of the Program and its implementation. Additionally, establish the purpose, responsibilities, supervision and structure of the Program, among others.

This document includes the general policies adopted by Claro, to carry out its business and operations in an ethical, transparent and honest manner; to be able to establish conditions to identify, detect, prevent and mitigate the risks of corruption and transnational bribery risk.


It also establishes specific procedures for the Compliance Officer to implement the Program, in accordance with the provisions of Chapter XIII of the Basic Legal Circular issued by the Superintendence of Corporations.

## Definitions and abbreviations

- **Claro:** Trademark with which Comunicación Celular S.A. is presented and recognized in the market. Comcel S.A., Amov Colombia S.A., Ideas Musicales de Colombia S.A.S. and Hitss Colombia S.A.S., who make up the same business group.
- **Company(s):** Indistinctly, it refers to the following legal person(s): Comunicación Celular S.A., Comcel S.A., Amov Colombia S.A., Ideas Musicales de Colombia S.A.S. and Hitss Colombia S.A.S., who make up the same business group.
- **Counterparties:** They are all natural or legal persons with whom the Company has commercial, business, contractual or legal relations of any kind. This includes, but is not limited to, distributors, representatives, advisors, business partners, agents, intermediaries, customers, contractors, managers, lobbyists, consultants or suppliers that are part of the Company's value chain.
- **Corruption:** In the public sphere, it is the abuse of power for one's own benefit or that of the Company, it occurs when interacting with Public Servants or Government Entities and is known as Public Corruption. In the private sphere, it is the abuse of power to obtain some undue benefit for the Company, personal or for a Third Party and is known as Private Corruption. In general, it will be all conduct aimed at the Company benefiting, or seeking a benefit or interest, or being used as a means in, the commission of crimes against the public administration or public property or in the commission of Transnational Bribery conduct, in

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accordance with the provisions of: the Criminal Code (Law 599 of 2000 for offences against the public administration, embezzlement, extortion, bribery, improper conclusion of contracts, influence peddling, illicit enrichment, prevarication, abuse of authority and other offences, usurpation and abuse of public functions, offences against public servants, improper use of information and influence arising from the exercise of public functions and omission of assets, fraud and the promotion of tax evasion structures), the crimes indicated in Law 1474 of 2011 (article 16 and following), Law 2111 of 2021, in harmony with the amendments of Law 2195 of 2022.

- **Due Diligence:** It is the periodic and continuous process of review and evaluation of counterparties to identify, prevent, mitigate, control and monitor Corruption Risks and Transnational Bribery Risks in the development of the Company's activities, to which it is exposed. This process has no exceptions, therefore, it applies to partners, administrators, employees, contractors and any other counterparty of the Company.
- **Transparency and Business Ethics Program Manual (Program):** It is the document that contains the Compliance Policy and the procedures of the Compliance Officer, whose objective is to identify, detect, prevent, manage and mitigate Corruption Risks and Transnational Bribery Risks, according to the Risk Matrix and the instructions or recommendations provided by the Superintendence of Corporations.
- **Risk Matrix:** It is the tool that allows Claro to identify, evaluate, control, monitor the Corruption Risks and the Transnational Bribery Risks to which the Companies may be exposed.
- **Whistleblowing Portal:** It is the platform through which Employees or Counterparties can anonymously, confidentially and without retaliation, report any violation of the Code of Ethics and/or the Company's policies/procedures, available at <https://denuncias.americamovil.com/>
- **C/ST Risks:** This is the abbreviation to refer to the Risk of Corruption and/or the Risk of Transnational Bribery.
- **Corruption Risks or C Risk:** It is the possibility that, by action or omission, the purposes of the public administration are diverted, or the public assets are affected for a private benefit.

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- **Transnational Bribery Risks or ST Risk:** It is the possibility that a legal person, directly or indirectly, gives, offers or promises to a foreign Public Servant sums of money, objects of pecuniary value or any benefit or utility in exchange for said public servant performing, omitting or delaying any act related to his or her functions and in relation to an international business or transaction.
- **Public Servant (national/foreign):** Is the person who holds a public office or is an employee of a government entity or any other decentralized unit thereof, whether elected or appointed, representing any level of government, national, departmental or municipal; including but not limited to, its legislative bodies, ministries or secretariats, superintendencies, judicial bodies, investigative agencies and bodies. Likewise, any member belonging to a political party or candidate for any popularly elected position. Public Servants are also considered to be officials of public international organizations (World Bank, the United Nations, the International Monetary Fund, among others).
- **Transnational Bribery:** It is any conduct in which an advantage or benefit, sums of money or any object of pecuniary value is offered, promised or granted, directly or indirectly, to a foreign Public Servant, or to a foreign private person in relation to an international business or transaction, in order to obtain or retain an undue business or advantage, or to perform, omit or delay any act related to the exercise of his functions and in relation to an international business or transaction.


## 1. EXECUTIVE SUMMARY

Claro requires its employees to act ethically and comply with applicable laws and regulations. To fulfill this commitment, Claro designed and implemented a Business Transparency and Ethics Program (PTEE).

The Program contemplates, incorporates and reinforces Claro's fundamental values. The goal of the Program is to promote and maintain a culture of acting ethically, obeying the laws, and doing the right thing with respect to Counterparties. The Program is aimed at providing reasonable assurance that compliance management practices are in place in the Company(s) and that the Company(s) comply with all applicable legal and regulatory requirements.

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The Program defines the policies, procedures, and areas of responsibility that the Company(s) apply to fulfill its commitment to conduct Claro's business ethically and in compliance with the law.

The Manual of the Transparency and Business Ethics Program (PTEE) includes the requirements of the Program and its implementation. In addition, the purpose, responsibilities, supervision and structure of the Program are established.

All employees are responsible for acting in compliance with the laws, regulations, and policies of the Company(s). Employees should seek guidance and training as they deem necessary and are responsible for reporting matters related to potential noncompliance or suspected noncompliance.

The structure of the Program is designed to promote consistency of policies and practices across the Company(s), while allowing for variations to reflect business needs. This Manual defines the areas of responsibility within the Program and summarizes the most important ethics and compliance commitments for the Company(s).

The Manual frequently references other compliance documents of the Company(s), such as policies or procedures (See Annex A for details). These documents contain precision, detail or development with respect to the Manual and should therefore be consulted where appropriate.

## 2. OBJECTIVE OF THE TRANSPARENCY AND BUSINESS ETHICS PROGRAM

### 2.1 Claro's values


Claro's commitment to ethics and compliance stems from core values such as: Customer Experience, Innovation, Human Development, Sustainability, Integrity, Efficiency and Collaboration (hereinafter "the Values").

The Companies' Codes of Conduct (hereinafter the "Codes"), including América Móvil's Code of Ethics, provide standards and guidelines of behavior for counterparties, which reflect the Company(s) Values.

The Program serves as a common approach to ethics and compliance and incorporates the Values into business decisions and employee behavior.

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## 2.2 The Transparency and Business Ethics Program (PTEE)

The Program establishes the policies and procedures that the Company(s) apply to comply with the commitment to conduct business ethically and in compliance with the Law, consistent with the values of the Company(s).

- **Objective:** The objective of the Program is to facilitate and maintain a culture where acting ethically, obeying the laws and doing the right thing with respect to the Counterparties is what is lived day by day. The Program is aimed at ensuring that practices are in place to comply with all applicable legal and regulatory requirements for all Company(s).
- **Scope:**

The Program applies to the Company(s) and all of their Counterparties, in any commercial, contractual or business relationship. The Program aims to prevent, detect, manage and mitigate the Risks of Corruption and Transnational Bribery, in accordance with Law 1778 of 2016, Law 1474 of 2011, Law 2195 of 2022 and the other applicable provisions on crimes against the public administration.

The Program was designed and implemented in accordance with the guidelines of Chapter XIII of the Basic Legal Circular of the Superintendence of Corporations and the Compliance Policies adopted by the Companies. Its provisions are mandatory for employees, directors and all Counterparties acting on behalf of or in the name of the Company(s) or who may create exposure to C/ST Risks.

The scope of the Program includes all activities, processes, decisions, interactions with public and private entities, and any action carried out directly by the Company(s) or through third parties that may involve risks of Corruption or Transnational Bribery.


### Corporate Reference Documents and Standards

The Company(s) observes corporate compliance standards adopted by its Parent Company, including international anti-corruption guidelines applicable to América Móvil S.A.B. de C.V. ("AMX"). This reference does not modify the scope or obligations of the PTEE defined under Colombian regulation.

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### 3. EMPLOYEE RESPONSIBILITY

#### 3.1 Act in compliance for all employees

- Employees should be familiar with the Codes and other applicable policies that allow them to act ethically and prevent and manage C/ST Risks.
- Employees should receive appropriate training as necessary in areas that are related to their responsibilities.
- Employees should familiarize themselves with the ethical, legal, and regulatory requirements that apply to their position and the positions of the employees who report to them so that they can properly supervise them or manage their activities.
- Each year, employees must participate, receive or carry out instruction and/or training processes to ensure adequate compliance with the Manual.
- Claro will review the violations of ethics and compliance to take the corresponding disciplinary actions.
- Employees are called upon and required to report instances of interaction with government officials, as described in the "Interaction with Government Officials" Policy.


#### 3.2 Act in compliance for those employees exposed to C/ST Risk

- Employees in charge of the relationship with suppliers, distributors, contractors, partners and other counterparties must become familiar with the ethical, legal and regulatory requirements and risks that may be present in the commercial relationship, so that they can adequately supervise the activities they develop.
- Claro declares its commitment against corruption and has developed, among others, this Manual and an Anti-Corruption Policy, Policy for Interaction with Government Officials, Third Party Due Diligence Policy and Risk Matrix.
- Employees are called upon and required to report instances of interaction with government officials, as outlined in the "Interaction with Government Officials" Policy.

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## 4. SUPERVISION


### 4.1 Board of Directors

- The Board of Directors of each Company or the Shareholders' Assembly in those Companies that do not have such a corporate body, define the level of requirement to transmit values and ethical behavior in the culture of the Companies.
- The Boards of Directors of each Company or the Shareholders' Assembly in those Companies that do not have such a corporate body and the Executive Committee do not tolerate violations of the Code of Ethics. Therefore, they provide the Compliance Officer with the resources for the implementation, compliance and effectiveness of the Transparency and Business Ethics Program within each Company.
- The Boards of Directors of each Company or the Shareholders' Assembly in those Companies that do not have such a corporate body, authorize the Compliance Officer to lead the structuring, compliance and effectiveness of the Program.
- The Boards of Directors of each Company or the Shareholders' Assembly in those Companies that do not have such a corporate body, shall define and approve, when deemed useful and appropriate, independent audits to monitor the effectiveness of the Program.
- The Boards of Directors of each Company or the Shareholders' Assembly in those Companies that do not have such a corporate body, the Executive Committee or the Compliance Officer communicate issues of ethics and compliance. Such communications may be included within meetings, as well as through internal means or communication systems.
- It is the responsibility of the Board of Directors of each Company or the Shareholders' Assembly in those Companies that do not have such a corporate body, to establish and define compliance policies, which includes the instructions that must be given regarding the design, structuring, implementation, execution and verification of actions aimed at the prevention and effective mitigation of any corrupt practice.

The following are actions related to the development of the Program, responsibility of the Board of Directors or the Shareholders' Assembly in those Companies that do not have such a corporate body:

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- Issue and define the Manual of the Transparency and Business Ethics Program (PTEE).
- Define the profile of the Compliance Officer in accordance with this Manual, without prejudice to the provisions of Chapter XIII of the Basic Legal Circular of the Superintendence of Corporations.
- Designate the Compliance Officer.
- Approve the Manual of the Transparency and Business Ethics Program (PTEE).
- Assume a commitment aimed at the prevention of C/ST Risks, so that Claro can carry out its business in an ethical, transparent and honest manner.
- Ensure the supply of the necessary resources (economic, human and technological) so that the Compliance Officer can fulfill his responsibilities.
- Order the pertinent actions against Claro's shareholders, employees and administrators who have management and administration functions, when they violate the provisions of the Program.
- Lead an appropriate communication and pedagogy strategy to ensure the effective dissemination and knowledge of the Compliance Policies and the Manual to Employees, Associates and Contractors (according to the risk factors and risk matrix identified), as well as other relevant stakeholders.


## 4.2 Legal Representative

The functions of the Legal Representative in relation to the Program are the following:

- Present, together with the Compliance Officer before the Board of Directors or the Shareholders' Assembly in those Companies that do not have such a corporate body, the proposal of the Manual of the Transparency and Business Ethics Program (PTEE).
- Ensure that the Program's manual is aligned with the Compliance Policies adopted by the Board of Directors or the Shareholders' Assembly in those Companies that do not have such a corporate body.

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- Provide effective, efficient, and timely support to the Compliance Officer in the design, direction, supervision, and monitoring of the Program.
- Certify to the Superintendence of Corporations compliance with the provisions of the Program's manual, when required by the Superintendence.
- Ensure that all activities related to the implementation of the Program are duly documented to comply with the criteria of integrity, reliability, availability, compliance, effectiveness, efficiency, and confidentiality established by current regulations. The documentary supports must be kept in accordance with the provisions of Article 28 of Law 962 of 2005, or the regulation that modifies or replaces it, which must be for at least ten (10) years.
- It must inform the Superintendence of Corporations in writing, addressed to the Delegation of Economic and Corporate Affairs, within fifteen (15) business days following any modification or designation, of the name, identification number, email and telephone number of the Compliance Officer, in accordance with the specific instructions and requirements established in this manual or those determined by the Superintendence of Corporations
- With the above information, a copy of the extract of the minutes of the Board of Directors or the Shareholders' Assembly in those Companies that do not have such corporate body must be sent, which states the appointment of the Compliance Officer and/or any other document required by the Superintendence of Corporations.
- In case of violating the responsibilities and functions mentioned herein, the legal representative is exposed to possible sanctions, including administrative and disciplinary consequences, in accordance with the processes established by the company.

The following are specific functions of the President or whoever takes his place:

- The President is responsible for conducting oversight and having a reasonable view of the Program.
- The President must report to the corporation on a monthly basis on the status of the Ethics Committee.
- The President's duties with respect to Corruption and Transnational Bribery matters include:

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Promote a culture of ethical conduct and compliance.

Responsible for the performance of the Companies in the obligations of ethics and compliance.

- Have knowledge of the content and operation of the Program.
- Ensure that there is adequate personnel and resources within the Companies to carry out ethics and compliance functions, in accordance with the recommendations of the Compliance Officer and the Superintendence of Corporations.
- Work together with the Compliance Officer to ensure that the Program is implemented, modified where appropriate and considers the particular needs of the Companies.

#### 4.3 Compliance Officer

To be appointed as a Compliance Officer, at least the following requirements must be met:


- Be a natural person.
- Have the ability to make decisions to manage C/ST Risk and have direct communication, depend on and report directly to the Board of Directors or the Shareholders' Assembly in those Companies that do not have such a corporate body.
- Have sufficient knowledge in C/ST Risk management and understand the ordinary course of Claro's activities.
- Have the support of a human and technical work team, according to the C/ST Risk and the size of Claro.
- Be domiciled in Colombia.

The Compliance Officer has the following disqualifications or incompatibilities:

- Not belong to the administration or corporate bodies or internal or external auditing or control bodies (tax auditor or linked to the tax audit company that exercises this function, if

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applicable) or be a legal representative, board member or belong to areas that generate conflicts of interest in the development of their activities.


- When the Compliance Officer is not linked to the Company(s), this natural person may or may not be linked to a legal entity.
- Not serve as a Compliance Officer, principal or alternate, in more than (10) Companies. To serve as the Compliance Officer of more than one Obligated Business, (i) the Compliance Officer must certify; and (ii) the body that appoints the Compliance Officer must verify that the Compliance Officer does not act as such in Companies that compete with each other. When there is a business group or a declared control situation, the Compliance Officer of the parent or controlling company may be the same person for all the companies that make up the group or conglomerate, regardless of the number of companies that make it up.
- In the event that the Compliance Officer presents a real or potential situation of conflict of interest, he/she must report and manage it in a timely manner (immediately) through the channel established by the company for this purpose.

**The following are responsibilities and functions of the Compliance Officer:**

- Present, together with the Legal Representative, before the Board of Directors or the Shareholders' Assembly in those Companies that do not have such a corporate body, the proposal for the Manual of the Transparency and Business Ethics Program (PTEE).
- Present at least once a year to the Board of Directors or the Shareholders' Assembly in those Companies that do not have such a corporate body, reports that include an evaluation and analysis of the efficiency and effectiveness of the Program, as well as proposals for improvement. In addition, the results of the Compliance Officer and Claro's administration in compliance with the Program must be presented.
- Ensure that the Program Manual is aligned with the Compliance Policies adopted by the Board of Directors or the Shareholders' Assembly in those Companies that do not have such a corporate body.
- Ensure compliance with the Program in an effective, efficient and timely manner.

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- Implement and regularly update a Risk Matrix adapted to Claro's specific needs, its Risk Factors and Compliance Policies, to effectively manage C/ST Risks.
- Define, adopt and monitor actions and tools for the detection of C/ST Risk, in line with the Compliance Policy and the Risk Matrix, to prevent C/ST Risk.
- Ensure the implementation and operation of appropriate channels, such as the Whistleblowing Portal, to allow anyone to confidentially and safely report breaches of the Program and potential suspicious corruption-related activity.
- Verify the proper application of the whistleblower protection policy (Non-Retaliation Policies) and, with respect to employees, the workplace harassment prevention policy in accordance with the law. In addition to ensuring the application of the "Protocol of the Operation and Management of Complaints"
- Coordinate the development of internal training programs to improve employee knowledge of the Program.
- Verify compliance with the Due Diligence procedures established by Claro.
- Ensure the proper archiving of documentary supports and other information related to the management and prevention of C/ST Risk, in accordance with the Document Management Policies and/or the Information Security Policies of the Company
- Design the methodologies for classification, identification, measurement and control of C/ST Risk that will be part of the Program.
- Carry out the evaluation of compliance with the Program and the C/ST Risk to which Claro is exposed.
- To fulfill his or her responsibilities, the Compliance Officer functions as an independent and objective party with unrestricted access to the records of the Companies' businesses, files, meetings, and employees.
- The Compliance Officer has the right and responsibility to ensure compliance with the Program, conduct investigations, or other activities related to ethics and compliance, which may be done internally or with external consultants to perform those activities.

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- The Compliance Officer is responsible for determining corporate strategy, oversight and controls as it relates to ethics and compliance.
- The compliance officer reports to and has direct communication with each board of directors. Likewise, it must submit reports on its management addressed to the Boards of Directors of each Company annually on the activities under development, progress of implementation, the findings evidenced and the status of the Program, including information on training, communications and other matters. The Compliance Officer has functional independence and access to the Board of Directors for the proper performance of his functions, in accordance with the provisions of Chapter XIII of the Basic Legal Circular.
- The Compliance Officer shall meet at least monthly or as often as the Ethics Committee meets to review information on the complaints received on the Complaints, Investigations and Disciplinary Actions Portal.
- The Compliance Officer will oversee the progress of the compliance training process for employees and third parties.
- The Compliance Officer will accompany and guide employees and third parties on a permanent basis on the execution of the Program, through meetings and/or cases reported directly to the Complaints Portal.
- Carry out monitoring of the cases reported by employees of interaction with government officials, carry out the analysis of the cases and present results to the Ethics Committee, as described in the procedure "Policy of Interaction with Government Officials".


The Transparency and Business Ethics Program (PTEE) Manual will be reviewed and updated at least every two (2) years, or sooner if there are relevant changes in the applicable regulation, in the risks of Corruption and Transnational Bribery, in the organizational structure or in the activities of the Companies. The update shall be submitted to the Boards of Directors for approval, in accordance with the provisions of paragraph 5.1.1.1. of External Circular 011 of 2021 of the Superintendence of Corporations.

#### 4.4 Statutory Audit

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Auditors have the obligation to report to the competent authorities any act of corruption that they detect in the exercise of their functions.

In compliance with the provisions of Article 207 of the Code of Commerce and other applicable regulations, the Statutory Auditor shall ensure that the Company(s) adopt and adequately comply with the control and surveillance measures related to the prevention, detection and reporting of possible acts of Corruption and Bribery, including Transnational Bribery. In the performance of his/her functions, the Statutory Auditor shall timely inform the administration and the corporate bodies about the irregularities detected and evaluate the reasonableness of the controls implemented within the framework of the PTEE, in accordance with the legal and professional obligations that apply to him/her.

Article 32 of Law 1778 of 2016, which adds numeral 5 of Article 26 of Law 43 of 1990, imposes on statutory auditors the express obligation to report to the criminal, disciplinary and administrative authorities, for the alleged commission of crimes, which they detect in the exercise of their position, even despite professional secrecy.

In addition, they must pay special attention to alerts that may generate suspicion of an act related to a possible act of corruption.


Due to the difference in the functions of the statutory auditor, the legal representative and the Compliance Officer, the statutory auditor or legal representative should not be appointed as the Compliance Officer.

#### 4.5 Directorates

- Directors will integrate the Program into the operations and decisions they make and will also include professionals with knowledge of ethics and compliance in the work teams, when appropriate.
- Directors should work together with the Compliance Officer to support the Compliance Officer in developing compliance strategies, policies, and procedures and to assist in their effectiveness.
- Directors should encourage employees to identify potential failures and opportunities for improvement in ethics and compliance issues.

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- In addition, the Directors are responsible for supporting the Program, fulfilling the following responsibilities:

Include messages about the importance of ethics in business in the presentations to customers, employees, distributors, contractors, partners and other counterparties.

Include ethics and compliance issues as part of the performance review process for employees, distributors, contractors, partners, and other counterparties.

#### 4.6 Management

- The managers of the different directorates of the Company(s) are responsible for ensuring that their employees comply with the Transparency and Business Ethics Program (PTEE).
- The managers of each directorate will collaborate with the Compliance Officer and with his designee, to prevent, detect and respond to legal, policy and ethical breaches, assigning responsibilities and verifying compliance with these.
- The managers of each directorate are responsible for helping to promote a culture of ethical conduct and respect for laws and regulations.

#### 4.7 Leaders (Team, Managers and Upper Ranks)


- The Leaders of each directorate who supervise employees who do not hold managerial positions, have a central role in promoting ethical conduct and a commitment to compliance with the law in their respective areas of authority.
- The Leaders of each directorate are responsible for compliance with the Code of Ethics and the Business Transparency and Ethics Program (PTEE).
- To prevent ethics and compliance issues from arising, Leaders in each directorate should:

Expose cases of corruption and transnational bribery to their superior or the Compliance Officer.

Encourage employees within their areas of responsibility to

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- (i) Adhere to the highest standards of ethics and compliance.
- (ii) Suggest ways that can improve the Program.
- (iii) Report situations that they consider may generate non-compliance issues.

## 5. PROGRAM STRUCTURE

The Program includes the following three (3) phases: prevention, detection and response, and continuous improvement.

**Prevention** includes key standards and activities related to identifying, interpreting and implementing ethics and compliance requirements and ensuring that the employees involved understand their roles and responsibilities.

**Detection and response** includes standards and activities for monitoring, investigating, and reporting on compliance processes, practices, and outcomes, to provide reasonable assurance that operations are conducted in compliance with applicable ethics and compliance requirements. These standards include a process for ensuring proper reporting and remediation of ethics and compliance issues.

**Continuous improvement** includes standards and activities associated with updating policies and finding best practices for managing ethics and compliance requirements.

### 5.1 Employees who lead the Transparency and Business Ethics Program

#### 5.1.1 Ethics Committee


The Company's Ethics Committee (hereinafter, the "Committee") acts as a support and advisory body for the Compliance Officer in the implementation, monitoring and strengthening of the Transparency and Business Ethics Program – PTEE. The Committee contributes to the identification of ethics and compliance initiatives, and makes recommendations for the continuous improvement of the Program.

- The Committee is made up of:

President of the Company

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Corporate Legal and Sustainability Director  
Corporate Chief Financial Officer  
Corporate Human Resources Director  
Executive Director Corporate Market Unit  
Compliance Officer  
Director of Risk Management and Internal Control  
Chief Audit Officer (as a permanent guest)

#### **Functions of the Committee:**

- Provide accompaniment and support to the Compliance Officer in strategic matters of the Program.
- Review and recommend improvements to ethics and compliance policies, procedures, and controls.
- Know the reports and/or information presented by the Compliance Officer on the implementation and execution of the PTEE.
- Monitor trends, risks and good practices in terms of ethics and compliance.


The formal appointment of the members of the Committee will be made by the Company's Management (through the President), in accordance with the current organizational structure. The Compliance Officer will verify that the members of the Committee sign the corresponding confidentiality agreements or commitments and will coordinate the updating of the documentary information associated with the composition of the Committee when changes occur.

Investigations arising from reports received through the Whistleblowing Portal will be managed by the competent areas in accordance with the Company's internal policies. The Committee will be able to know the consolidated results and the measures adopted, to support the improvement of the Program and the promotion of the ethical culture.

The management of the Ethics Committee will be carried out in accordance with the "Operation Protocol for Ethics Committees and Whistleblowing Management of América Móvil" which establishes the general guidelines for the operation of the Committee, as well as for the attention, follow-up and investigation of possible violations of the Code of Ethics

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and/or the Company's policies. The technical guidelines for the operation of the Complaints Portal can be found in the User Manual and Management of the Complaints Portal.

### 5.1.2 Other directorates

Other directorates of the Company(s) have the responsibility to support the Program, regardless of the responsibilities they may have due to their role.

- **Corporate Legal and Sustainability Directorate** provides advice and representation to the Company(s) in legal disputes and administrative proceedings, as well as the interpretation and applicability of bylaws, laws, rules, industry regulation, decisions of control entities, contractual obligations and other legal requirements affecting the operations of the Company(s).

Additionally, it is responsible for making inquiries on restrictive and compliance lists to shareholders, both at the time of the relationship and on an annual basis.

- **The Internal Audit Department** provides an independent function and is responsible for determining whether the internal control established by the Company(s) is functioning properly to prevent or detect any breach of established codes and policies.

Is responsible for determining whether the process for controlling the operations of the Company(s) is properly designed and works effectively.

Provides advice regarding the establishment of internal controls.


In accordance with the annual audit plan, it is responsible for carrying out audits for the identification, evaluation, prioritization and management of C/ST Risks in each of the areas, for the verification of compliance and effectiveness of the Transparency and Business Ethics Program (PTEE) and reporting the results to the Compliance Officer.

- **The Corporate Human Resources Department** oversees employee evaluations, incentives, and disciplinary actions.

Supports the Compliance Officer with ethics and compliance communications through different means including: intranet, knowledge portals, Company(s) magazines, billboards, FAQs, among others.

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Maintain historical records of ethics and compliance communications and training for employees.

Conducts initial and periodic training of the Code of Ethics and other policies that support the Program, to employees and contractors' workers.

Annually requests from the employees of the Companies the certificate of knowledge of the Code of Ethics.

Through the selection area, it is responsible for carrying out background checks and home visits to employees.

Record each training session.

- **The Corporate Finance Department** controls the financial resources and maintains the accounting records of the Company(s).

It is responsible for ensuring that all income and expenditure of the Company(s) is supported by the necessary documentation in accordance with applicable legislation and is duly reflected in the accounting books and records.

Ensure that suppliers, distributors, contractors, partners, and other counterparties of the Company(s) complete and carry out the Supplier Registration Process.


In the event that the Program requires an extraordinary budget, the Company(s) through the Finance Department, will approve an extraordinary budget item, which has immediate approval. The regular budget to meet the functions of the program will depend on and will be responsibility of each Directorate.

It requests from suppliers, distributors, contractors, partners and other counterparties of the Companies the certificate of knowledge of the Code of Ethics before approving the third party as a supplier.

Is responsible for leading and managing the Supply Chain Due Diligence Procedure aimed at providing the company with the necessary elements to identify and evaluate C/ST Risks.

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Due Diligence procedures must be carried out on a regular basis, in accordance with and according to the frequency established by this Directorate, through the periodic review of legal, accounting or financial aspects and also to verify the good credit or reputation of the counterparties.

In accordance with the provisions of Paragraph 1 of Article 9 of Law 2195 of 2022, which adds Article 34-7 to Law 1474 of 2011, in the aspects not foreseen or not specifically regulated in this PTEE Program, it will be articulated with the procedures, methodologies and guidelines of the ML/FT/FPWMD Self-Control and Risk Management System (SAGRILAF), when such articulation is pertinent. This articulation does not imply transfer of responsibilities, substitution of elements of the PTEE or functional duplication between the systems. Its purpose is to ensure methodological coherence in the identification, evaluation and mitigation of risks, preserving the autonomy and nature of each program, and allowing the efficient use of processes, such as, but not limited to, due diligence, registration of third parties and/or knowledge of Counterparties.

## 5.2 C/ST Risk Assessment and Management

### 5.2.1 Risk Manual

The Company(s) has a Risk Management Methodological Manual, whose objective is to establish the stages and standardized criteria for the proper implementation of risk management, through a methodology that allows in an efficient and effective manner to maintain the identification, evaluation, control and monitoring of risks that may affect the fulfillment of the Company's strategic tactical and operational objectives and thus guarantee the prevention of C/ST Risk and the fulfillment of the organizational objectives and the development of business in Claro.


Risk management includes the risks of corruption and transnational bribery (C/ST) and those related risks that may impact the proper functioning of the Company(s).

The update of the risk management matrix must be carried out whenever there are changes in the activity of the Company(s) that affect the degree of Risk of C/ST, or at least every two (2) years or as indicated by the Compliance Officer.

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The Company(s) have established matrices for the prevention of C/ST Risks, which are located on the internal platform; This allows the identification, assessment of risk levels, definition of risk treatment based on controls and thus obtain risk management reports.

In accordance with the provisions of Paragraph 1 of Article 9 of Law 2195 of 2022, which adds Article 34-7 to Law 1474 of 2011, in the aspects not foreseen or not specifically regulated in this PTEE Program, it will be articulated with the procedures, methodologies and guidelines of the ML/FT/FPWMD Self-Control and Risk Management System (SAGRILAF), when such articulation is pertinent. This articulation does not imply transfer of responsibilities, substitution of elements of the PTEE or functional duplication between the systems. Its purpose is to ensure methodological coherence in the identification, evaluation and mitigation of risks, preserving the autonomy and nature of each program, and allowing the efficient use of processes, such as, but not limited to, due diligence, registration of third parties and/or knowledge of Counterparties.


### 5.2.2 Considerations on C/ST Risks

Companies in general and their employees or counterparties are increasingly facing various negative consequences due to the lack of prevention of Corruption and Transnational Bribery, the following risks are found:

- Material Risk refers to the possibility that the Company(s) will be used to carry out acts related to Corruption and/or Transnational Bribery, either by the company itself or by persons linked to it, such as partners, administrators, employees, officers or contractors. This risk comprises three situations: company corruption, corruption through the company and corruption against the company.
- Legal Risk refers to the possibility that the Company(s) or any of its collaborators may face legal consequences as a result of the commission of acts of Corruption and/or Transnational Bribery or related; This risk stems from the legal consequences that can arise when laws and regulations are violated.
- Economic Risk refers to the possibility that the Company(s) will suffer economic losses, with a negative financial impact that may result from the commission of acts such as Corruption and/or Transnational Bribery, including legal costs, fines, compensation and loss of assets.
- Operational Risk refers to the risks associated with non-compliance or defective execution of the processes and procedures established by the Company(s). In addition, it may arise due to

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the existence of inappropriate, insufficient or inadequate procedures, which may facilitate the commission of acts related to Corruption and/or Transnational Bribery.

- Reputational Risk refers to the possibility that the name of the company(s), its brands or its representatives are publicly associated with unlawful acts, it is essential for organizations to protect their reputation, as it can influence the trust of customers, business partners and public opinion in general.
- Country Risk refers to the possibility that adverse events in the country's political, legal, economic or social environment may adversely affect the Company(s)'s operations, its financial results and its ability to meet its obligations and objectives.

### 5.2.3. Emerging Risks – Virtual Assets and Cryptoassets

While the Company(s) do not currently engage in transactions with virtual assets or cryptoassets, the PTEE recognizes that such instruments represent an emerging risk in terms of Corruption and Transnational Bribery, especially due to their potential use to conceal beneficial owners, channel improper payments, or facilitate untraceable transactions. Consequently, the monitoring of the regulatory and technological environment with respect to virtual assets will be part of the periodic risk assessment process of the PTEE, in accordance with the guidelines of Chapter XIII of the Basic Legal Circular and the best practices in risk management.

### 5.2.4 Evaluation of the Program's Risk Management

On an annual basis, the Audit Directorate will carry out the Program's risk assessment to carry out the follow-up to control the progress of the execution of the plans and take the necessary actions for their compliance.


The monitoring focuses on reviewing compliance with the controls established in the C/ST Risk Matrix by carrying out:

- Follow-up to the risk management matrix of each of the impacted processes.
- Follow-up on the actions that must be carried out for the fulfillment of the Program.

The follow-up, review and monitoring of the results of the evaluation are carried out by the Compliance Officer in accordance with the defined functions and responsibilities.

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The Compliance Officer monitors the development, implementation, and completion of risk mitigation plans developed in response to the findings of the ethics and compliance risk assessment, which must be conducted by the Internal Audit Directorate on an annual basis, in order to monitor the progress of the execution of the plans and take the necessary actions for compliance.

### 5.3 Due Diligence Procedures

The Company(s) use third parties or counterparties to carry out part of their activities and to facilitate transactions.

The Company(s) take the necessary actions to ensure that partners, administrators, employees, contractors and any other counterparty of the Company, understand Claro's commitment to comply with the anti-corruption laws applicable in Colombia, such as the Colombian Anti-Transnational Bribery Law 1778 of 2016, Transparency Law 2195 of 2022, Article 16, Article 17, Article 18 of Law 1474 of 2011 and Law 2111 of 2021 and other relevant provisions on the matter of Corruption and Transnational Bribery Risks, and that act in accordance with the values and ethical standards of the Company(s).


Therefore, Claro has defined due diligence procedures for its third parties, which are detailed in the "Third Party Due Diligence Policy" and the "Claro Anti-Corruption Policy" and "América Móvil Third Party Due Diligence Protocol in Anti-Corruption Matters".

Within the Due Diligence process, the following minimum criteria must be met for its performance:

1. Identify the natural person, legal person, structure without legal status or similar with which the legal transaction or state contract is concluded.
2. Identify the final beneficiary(s) and the ownership and control structure of the legal entity, structure without legal personality or similar with which the legal business or state contract is concluded, and take reasonable measures to verify the information reported.
3. Request and obtain information that allows us to know the objective that is intended with the legal business or the state contract.

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- Counterparties have the mandatory duty to provide their necessary and sufficient information that is required to be able to carry out the Due Diligence process, in accordance with paragraph 4 of article 12 of Law 2195 of 2022.
- Conduct due diligence on an ongoing basis of the legal business or state contract, examining the transactions carried out throughout that relationship to ensure that the transactions are consistent with the knowledge of the natural person, legal person, structure without legal status or similar with which the legal business or state contract is conducted, their commercial activity, risk profile, and source of funds.

### Proportionality

The design and implementation of the PTEE responds to proportionality criteria based on the size, nature, structure, jurisdictions and sectors in which the Companies operate. For this reason, the controls and procedures established must be interpreted according to the level of inherent and residual risk, avoiding operational burdens that do not effectively contribute to the mitigation of the risks of Corruption and Transnational Bribery.

### Enhanced Due Diligence for Politically Exposed Persons (PEP)

As part of the Counterparty Due Diligence process, the Company(s) will recognize the need to apply enhanced measures when the Counterparty, its beneficial owner or its directors are identified as Politically Exposed Persons (PEP), in accordance with applicable Colombian regulations. The verification, validation, segmentation and monitoring of PEPs is carried out by the SAGRILAF Compliance Officer, in accordance with the procedures and methodologies established for the management of ML/FT/FPWMD risk.


The PTEE articulates with these procedures and uses the results of the Due Diligence practiced by SAGRILAF as an input for the evaluation and mitigation of the Risks of Corruption and Transnational Bribery, when applicable.

## 5.4 Ethics and Compliance Communications

The Company(s) distributes internal and external ethics and compliance communications to employees, suppliers, distributors, contractors, partners, and other counterparties of the Company(s), through a variety of means, including newsletters, bulletin boards, intranet portal, website, posters, and frequently asked questions.

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The Company(s) conduct surveys of employees and contractors to verify the effectiveness of the Program.

### 5.5 Independent Evaluations

The Boards of Directors or the Shareholders' Assembly in the event that there is no such corporate body, or the Ethics Committee may require compliance audits when it deems appropriate, including specific risks and controls, to identify improvements to the Program.

### 5.6 Dissemination and Training

The Compliance Officer, with the support of Human Management, must periodically develop ethics and compliance training aimed at all employees and suppliers, distributors, contractors, partners and other counterparties, as well as those who, according to the Company(s)'s own considerations or risk assessment, are more exposed to ethical risks or C/ST risks, that include topics such as the Codes, promote an ethical culture, the prevention of the Risk of C/ST and guide:

- The responsibility of employees, suppliers, distributors, contractors and allies to report matters related to ethics.
- The availability of the Whistleblowing Portal, the Non-Retaliation Policy and the principle of confidentiality of information.
- Matters relating to the observance of specific provisions of the Codes, where necessary.
- Dissemination and training must be carried out at least once a year, being duly documented.


These trainings and/or dissemination include at least the following topics:

- Key concepts, Objective and responsibilities stipulated in the PTEE Manual.
- Overview of Policies related to the Manual
  - Anti-Corruption Policy
  - Anti-Corruption Policy on Third Party Due Diligence
  - Anti-Corruption Policy for Interactions with Government Officials

Channels for Whistleblowing and Reporting related acts.

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Conducts established in Article 16 (Private Corruption), Article 17 (Unfair Administration), Article 18 (Improper Use of Privileged Information) of Law 1474 of 2011 and Law 2111 of 2021 (Crimes against Natural Resources and the Environment).

## 5.7 Sanctions

Any breach of the Program or the Code by employees, suppliers, distributors, contractors, partners and other counterparties of the Company(s) will have disciplinary and/or administrative consequences, as the case may be.

### 5.7.1 Employees

- Failure to comply with the Program may lead to sanctions such as: warnings, suspensions and cancellation of the contract in accordance with the provisions of the Internal Work Regulations.
- There may also be criminal and/or civil liability for violations of applicable anti-corruption laws, including, where applicable, the Foreign Corrupt Practices Act ("FCPA"), the Colombian Anti-Transnational Bribery Law 1778 of 2016, Law 1474 of 2011, Law 2111 of 2021, and Law 2195 of 2022 as applicable.

### 5.7.2 Suppliers, Agents and other Counterparties

- The commission of unethical conduct, contrary to the Code of Ethics and/or the Program by suppliers, distributors, contractors, allies and other third parties of the Companies, may entail: investigations, immediate termination of the contract, compensation for the damages caused, as well as possible lawsuits, investigations and complaints before the competent authorities.


## 5.8 Code of Ethics and Certification

The Compliance Officer is responsible for developing and maintaining the Codes for Companies and overseeing investigations of non-compliances identified during the certification process.

### 5.8.2 Code of Ethics and Conduct

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The Code of Ethics and the Code of Conduct apply to all employees of the Company(s) and are the heart of the corporate culture.

The codes define guidelines for situations in which employees must pay special attention to act responsibly.

According to the Claro Information Guide for Third Parties, it is the responsibility of suppliers, distributors, contractors and allies to act in compliance with the laws everywhere and at all times, as well as to live ethical and corporate values.

Claro expects its suppliers, distributors, contractors, partners, and other counterparties to act responsibly and adhere to laws and ethical principles at all times. That is why Claro has issued its own Claro Information Guide for Third Parties, which details the minimum ethical standards that must be met.

## 5.9 Complaint Reporting Channels

### 5.9.1 Whistleblowing Portal


The Company(s) have a Whistleblowing Portal to assist in the detection of situations involving ethical issues and potential violations of the Codes or the Law.

- The Ethics Committee will be responsible for overseeing the management of the Whistleblowing Portal.
- The Whistleblowing Portal: <https://denuncias.americamovil.com/> is available to employees, suppliers, distributors, contractors, partners, customers and other counterparties, 24 hours a day, 7 days a week to report matters related to ethical issues.
- Claro has a "Non-Retaliation Policy" that prohibits retaliation against employees or those who report a possible breach or suspected breach of a law, regulation, Codes of Ethics or policies
  - The Whistleblowing Portal includes a Principle of Confidentiality, according to which the anonymity and identity of the Whistleblower is protected at all times.

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- Claro will respect the confidentiality of the information received where the complainant requests anonymity and is legally allowed to do so. The information provided through the Whistleblowing Portal will be confidential and anonymous if requested.
- The Ethics Committee must review each complaint and determine whether it requires investigation, feedback or other action and must ensure that the complaints received are maintained in appropriate and confidential databases.
- To ensure consistency in the basic approach to assignment and investigation, Claro has implemented a Protocol for the Operation of Ethics and Complaint Management Committees.

The Protocol covers case assignment, investigation protocols, documentation guides, and training in the administration and oversight functions.

The Ethics Committee will assist in the resolution of concerns on issues associated with research. It will also present its recommendations to the Compliance Officer.

- The President, members of the Ethics Committee and the Compliance Officer will maintain an open-door policy to encourage employees, suppliers, distributors, contractors, partners, customers and other counterparties to report matters related to ethical issues or directly ask for advice, through meetings or the Whistleblowing Portal.

### 5.9.2 Reports of complaints of Transnational Bribery to the Superintendence of Corporations and acts of corruption to the Secretariat of Transparency


Claro includes and promotes within its Program and thus it is stated in this section that employees, counterparties and any person can access and report events where they identify facts or events related to:

- Complaint of Transnational Bribery - Superintendence of Corporations at the following link <https://www.supersociedades.gov.co/es/web/asuntos-economicos-societarios/denuncias-soborno-transnacional>
- Acts of Corruption – Secretary of Transparency at the following link

<http://www.secretariatransparencia.gov.co/observatorio-anti-corruption/anti-corruption portal>

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## 5.10 Handling of Program Non-Compliance

The Compliance Officer, after consulting the Ethics Committee, will determine if there is an obligation to report the corrupt act or transnational bribery or other situation, which is identified to an external entity. If so, such a report should be made in a timely manner and the best course of action to move toward compliance should be determined.

- If a specific law, rule, regulation, or other compliance requirement is unclear or ambiguous, appears to be in contravention of other compliance requirements, makes no sense, or appears to be impossible or impractical to comply with:

The apparent problem should be reported to the Compliance Officer, who should consult with the Ethics Committee regarding possible courses of action, to obtain clarification or to question or change the compliance requirement in question.

The Ethics Committee will coordinate with other Directorates, to address the apparent corrupt, bribery or unethical act.

No employee may handle the apparent corrupt, transnational bribery, unethical act by ignoring some compliance requirement or unilaterally interpreting any compliance requirement without the advice of the Ethics Committee or other appropriate compliance personnel.

## 5.11 Management and Retention of Records and/or Evidence


To ensure the proper administration and conservation of the documentation generated by continuous monitoring or as part of the management process of the Transparency and Business Ethics Program, the "Policy for the Selection, Conservation and Elimination of Archival Documents" implemented by Claro must be followed.

It is important to note that the minimum period of conservation of the Program's documents is 10 years, as established in Article 28 of Law 962 of 2005. In addition, documents must be properly maintained and purged once their life cycle is over.

It is essential to guarantee access to the Compliance Officer for proper management of the Program. Only authorized employees will have access to the information generated by the Program, as well as

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those who need to access it in the performance of their functions in the company. This access must be controlled and supervised to ensure the protection of the information and prevent its misuse.

The decisions, analyses and activities carried out within the framework of the PTEE must have the necessary supporting documentation for traceability, auditing and legal defense purposes, in accordance with the Company's document management policies.

### 5.12 Limitation of Operational Liability

The existence and application of the Transparency and Business Ethics Program does not constitute an absolute guarantee of the absence of acts of Corruption or Transnational Bribery. The PTEE is based on a reasonable risk management approach and the adoption of proportionate controls, without implying the total elimination of inherent risk. Consequently, the responsibilities of the Compliance Officer and the other areas of the Company are limited to the fulfillment of the functions established in this Program, without liability being derived for individual or hidden actions of employees or third parties that transcend the scope of reasonable control of the Program.

### 5.13 Independence and Non-Interference

The Compliance Officer shall perform his or her duties with technical independence and without undue interference. No employee, supplier, manager or third party may limit, restrict or hinder the analysis, management or reporting of situations that may constitute risks or possible acts of Corruption or Transnational Bribery. Any attempt at interference must be reported to the Ethics Committee or the Board of Directors, as appropriate.

### 5.14 Principle of Sufficient and Reasonable Evidence

The actions of the PTEE are based on the analysis of available, verifiable and reasonably obtainable information. The Program does not require or imply forensic auditing, thorough inspection, or outright verification, except as determined by internal policies or a competent authority.


## 6. ANNEXES

### Annex 1: Documents that complement, develop and comprise this Program

- Code of Ethics
- Code of Conduct for Employees

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- Information Guide for Third Parties
- Internal Work Regulations of each of Claro's Companies
- Protocol for the Operation of Ethics and Whistleblowing Committees
- Anti-Corruption Policy on Third Party Due Diligence
- Anti-Corruption Policy
- Anti-Corruption Policy for Interactions with Government Officials
- C/ST Risk Matrix
- Policies associated with the Integrity and Compliance Program (PIC) available at <https://www.americamovil.com/Spanish/gobierno-corporativo/Programa-de-Integridad-y-Cumplimiento-PIC/default.aspx>

## Annex 2: Warning Signs Related to the Risk of C/ST


Some warning signs that could indicate the need to report or carry out a review on the correct application of existing processes or procedures, which are focused on the prevention of C/ST Risk are:

In the analysis of accounting records, operations or financial statements:

- Invoices that appear to be false or do not reflect the reality of a transaction or are inflated and contain excess discounts or refunds.
- Operations abroad whose contractual terms are highly sophisticated.
- Payments or financial transactions that do not follow the usual procedures, such as payments to unknown bank accounts or to third parties unrelated to the business.
- Transfer of funds to countries considered as tax havens.
- Operations that do not have a logical, economic or practical explanation.
- Operations that are outside the ordinary course of business.
- Transactions where the identity of the parties or the origin of the funds is unclear.

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- Assets or rights, included in the financial statements, that have no real value or that do not exist.
- Tampering with accounting records, including altering financial statements or recording fictitious transactions to conceal illicit activities.
- Any request for undocumented payments, outside of normal business channels, especially when requesting to keep the request secret.

In the corporate structure or the corporate purpose:

- Complex or international legal structures with no apparent commercial, legal or tax benefits or owning and controlling a legal entity with no commercial purpose, particularly if it is located abroad.
- Legal entities with structures where there are national trusts or foreign trusts, or non-profit foundations.
- Legal entities with "offshore entities" or "offshore bank accounts" structures.
- Non-operating companies under the terms of Law 1955 of 2019 or that due to the development of the business can be considered as "paper" entities, that is, that reasonably do not fulfill any commercial purpose.
- Companies declared as fictitious suppliers by the DIAN.
- Legal entities where the Beneficial Owner is not identified.
- Counterparty seems to have no experience in the industry.
- The Counterparty has links with the government and/or public bodies in the performance of its functions.
- Suspicious behavior by employees or any counterparty, such as a lavish lifestyle that doesn't match their income level, undue pressure to obtain contracts or favors.

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- When the counterparty is uncooperative, evasive or aggressive during the engagement or due diligence process.

In the analysis of transactions, contracts or relationships:

- Frequently resort to consultancy contracts, brokerage contracts and the use of joint ventures.
- Contracts with contractors or state entities that give the appearance of legality that do not reflect precise contractual duties and obligations.
- Contracts with Contractors that provide services to a single client.
- Unusual gains or losses on contracts with Contractors or state entities or significant changes without business justification.
- Contracts that contain variable remuneration that is unreasonable or that contains cash payments.
- Payments to related parties (Associates, Employees, Subordinate Companies, branches, among others) without apparent justification.
- Undisclosed conflicts of interest can lead to biased decisions and corrupt practices.
- Exchanging gifts or providing excessive hospitality may indicate attempts to influence business decisions or public officials.

The characteristics to identify a Medium and High Risk Third Party are established below, as well as the signals perceived as Warning Signs of possible acts of Corruption or a situation of Transnational Bribery in accordance with the provisions of the ANNEX E - Warning Signs of the Third Party Due Diligence Protocol of América Móvil.


Likewise, the warning level that each scenario represents and how to act when identified is indicated.

### **Low Risk Level or Green Warning Signs**

#### Features to identify a Low-Risk Third Party

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- Not a Public Servant.
- No relationship with Public Servants.
- It will not have a relationship with Public Servants or Government Entities for the fulfillment of the Contract.
- Will not act on behalf of the Company.
- Has an Integrity Policy in which unrestricted compliance with the applicable regulatory framework and international best practices is observed.
- Will not make use of subcontracting personnel to provide the good and/or service.
- The good or service is related to administrative activities or inputs of the Company, for example: supply of stationery, cleaning products, office maintenance, etc. As long as it does not constitute outsourcing.
- The Third Party will provide or market goods or services less than or equal to USD \$10,000.00 (ten thousand US dollars) or its equivalent in local currency, and that are not recurring (recurring meaning more than 2 purchases per year).

#### Suggested recommendation

Issue authorization  
Not develop a risk treatment plan

#### **Medium Risk Level or Yellow Warning Signs**


Due to the nature of the services provided and anti-corruption controls:

- The Third Party's home country and the country where the services will be performed is not considered High Risk.
- The Third Party has been operating for 5 years or more.

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- The Third Party has a website that includes a Code of Ethics and anti-corruption policies.
- According to the results of the *screening* and what was stated by the Third Party, it has not been subject to investigations regarding practices of corruption, fraud, bribery or money laundering.

The nature of the Third Party belongs to the following categories:

- Environmental consulting
- Business advisory consulting
- Sales or marketing consultants
- Tax consulting or representation before tax authorities
- Visa management
- Accounting services
- Security services

Due to the nature of the interaction with Public Servants or Government Entities:


- The Third Party's interactions with Public Servants or Government Entities are generally administrative in nature (approval of permits, sales permits, applications, and tax payments).

Due to the fee/payment structure:

- Payment for the goods or services to be provided will have little or no impact on the Third Party's revenue.
- The proposed payments cover a small portion of the Company's operating expenses.
- The payment is proportional to the services rendered.
- The consideration is in the form of a fixed or agreed price and that price is proportional to the services provided.
- The payments have been determined on the basis of a public tender or are comparable to open market prices.
- Request that payments be made to foreign accounts or establishments.

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- Is a family member of a Public Servant or has family members of Public Servants on the payroll.
- Is a former Public Servant who operates with the Government Entity where he previously worked.
- Requests that all payments be in cash or cash equivalents.
- Lack of documentation or inconsistencies in documentation.
- Does not know or show interest in the local laws and regulations that govern the region.

#### Suggested recommendation

- ✓ Establish an adequate Risk Treatment Plan, and endorsed by the Compliance Officer, which may include, among other elements:
  - Include "Compliance" clauses in the respective contract;
  - Accept audit processes;
  - Responsible for management
  - Deliverables with periodicity

**\*Important note.** The Risk Treatment Plan must be developed on a case-by-case basis, taking into account the specific elements.

### **High Risk Level or Red Warning Signs**


#### **Features for Identifying a High-Risk Third Party**

Due to the nature of the services to be provided and anti-corruption controls:

- The Third Party's country of origin and/or the country where the services will be performed are considered High Risk.
- The Third Party has been operating for less than 5 years.

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- The Third Party does not have a website.
- The Third Party does not have a Code of Ethics or anti-corruption policies.
- According to the results of the *screening* and what was stated by the Third Party, it has been subject to investigations regarding practices of corruption, fraud, bribery or money laundering.


The nature of the Third Party belongs to the following categories:

- Lawyers
- Marketers of service cards, credit cards, prepaid cards and all those that constitute instruments for storing monetary value and that are not issued or marketed by Financial Institutions.
- Real estate developers or builders or intermediaries in the transfer of real estate.
- Intermediaries in tenders or contracts with the Government.
- Trading or distribution of precious metals, new or used vehicles
- Provision of services for the transfer or custody of money or securities.
- Recipients of donations, non-governmental organizations, parties or political organizations.
- Customs or commercial agents.
- Tax and legal advice.
- Managers for obtaining licenses or permits.
- Lobbyists.

Due to the nature of the interaction with Public Servants or Government Entities:

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- The Third Party provides services that include relationships with Public Servants for commercial purposes. Some examples may include:
- Obtaining land use or building permits
- Environmental consultancies
- Tax consultancies or representation before tax authorities
- Tenders and Government Contracts
- Obtaining a license or authorization to operate as a regulated entity
- The Third Party is controlled by the Government
- The Third Party provides services that are associated with relations with the Government
- The Third Party has family members, ties and/or economic interests with Public Servants or with the Government.


By fee/pay structure:

- The amounts paid by the Company for the goods or services provided generate a significant percentage of the total revenue of the Third Party.
- The consideration for the contracted services includes fees, "performance fees", commissions or significant bonuses.
- The Company will reimburse the Third Party for travel expenses or other expenses.
- The Third Party requests that the payment of the services provided and/or goods acquired be made in bank accounts abroad, specifically, in countries considered as tax havens.
- The Third Party will not provide copies of written receipts for the expenses claimed.

Due to the use of Third Parties in external services:

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- The Third Party regularly uses external service providers, consultants, joint ventures, subcontractors and other Third Parties to provide services on behalf of the Company that require interaction with Public Servants.
- The Third Party rarely or occasionally uses outside service providers, consultants, joint ventures, subcontractors, or other Third Parties to provide services on behalf of the Company, but these subcontractors have significant contact with Public Servants.

### **Red Warning Signs**


- Findings related to fraud and/or corruption in searches in public sources.
- Having as a practice to pay or promise Public Servants something of value in exchange for a routine government action.
- The Third Party is the subject of allegations in the media about improper payments.
- Refusal to disclose the names of the owners, partners or officers and attorneys-in-fact.
- Refusal to commit, in writing, to compliance with the laws against Corruption and Transnational Bribery.
- Holding companies that do not allow the shareholders or owners of the company to be clearly identified, without a logical explanation.
- Is insolvent or has significant financial difficulties.

### **Suggested Recommendation**

- ✓ Establish an adequate Risk Treatment Plan, and endorsed by the Compliance Officer, which may include, among other elements:
  - Include "Compliance" clauses in the respective contract;
  - Accept audit processes;
  - Responsible for management;
  - Deliverables with periodicity

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**Important Note.** The Risk Treatment Plan must be developed on a case-by-case basis, taking into account the specific elements.

In the event of putting the Company, any of its Subsidiaries or their personnel at risk, do not initiate or continue the employment relationship.

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### **ANNEX 3: Cash Handling Procedure**

Due to the nature of AMOV COLOMBIA S.A.'s operations, cash is not handled. In the case of the operations of IDEAS MUSICALES DE COLOMBIA S.A.S and HITSS COLOMBIA S.A.S, no cash is handled in the business with their counterparties.

For COMCEL, cash is handled in the following cases:

- Collection in windows: For the concepts authorized and established in the "SICACOM User Manual".
- In the "Manual for Generating and Consolidating Cash Operations Report" it is indicated that transactions that exceed Ten Million Colombian Pesos in cash must be reported.
- The "Managing Petty Cash" process and the "Finance Management Policy" are used as a reference.


### **Version Control**

<b>Version</b>	<b>Change made</b>	<b>Responsible for change</b>	<b>Date of change of version</b>
0	Initial version	Corporate Director Legal & Corporate Affairs -Hilda María Pardo	21-Mar-2017
1	The position names are updated, including Hitss and Fusión Telmex – Comcel. March 3, 2020. The members of the Ethics and Compliance Committee are updated. No approval certificate required	Corporate Director Legal & Corporate Affairs -Hilda María Pardo	30-Oct-2019

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Belongs to the process: Manage Risk and Business Continuity	Date: 23-Dec-25	
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2	In numeral 5.1.2 Ethics and compliance Committee, the designation of the people who will make up the committee to manage and investigate the complaints received from the complaints line is clarified In numeral 5.2.3 Other directorates: The approval of the budget (extraordinary and ordinary) for the anti-corruption program is clarified In numeral 5.2 Evaluation and management of ethics and compliance risks, it is clarified that the steps for the identification, assessment, prioritization and management of risks are defined in the Risk Management Methodology Manual and detail the actions for monitoring and follow-up	Corporate Director Legal & Corporate Affairs -Hilda María Pardo	5-Mar-2021
3	The wording is adjusted. "Grupo Carso" is eliminated, the regulatory references issued by the Superintendence of Corporations are updated. The Compliance Officer's responsibility for the submission of the annual management report to the Board of Directors (different from the Quarterly Report to the Audit Committee) is updated. The periodicity of the Compliance Officer's meetings with the Ethics Committee is updated. The composition of the Ethics Committee is modified (including the President, Legal & Corporate Affairs Director separate from the Compliance Officer). The name of some positions is adjusted according to the structure and corporate name of the Directors.	Corporate Director Legal & Corporate Affairs -Hilda María Pardo	11-Mar-2022
4	Adjustments to the Manual are made taking into account Chapter XIII of the Basic Legal Circular issued by the Superintendence of Corporations; the recommendations made during its visit by the Superintendence of Corporations on April 25, 2023; as well as the reports made by Internal Audit and Statutory Auditor.	Compliance Manager- Alejandro Baena Jaramillo	22-Jun-2023

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5	Adjustments are made to the "Due Diligence Procedure", and the roles and responsibilities of the "Compliance Officer"	Compliance Manager- Alejandro Baena Jaramillo	23-Aug-2023
6	<p>The Manual is reviewed and updated:</p> <ul style="list-style-type: none"> <li>(i) Adjustment in the definitions and other sections, eliminating the absorbed and/or liquidated companies (Infracel S.A. E.S.P. &amp; Operadora de Pagos Móviles S.A.S.),</li> <li>(ii) Modification of the scope by specifying regulatory references and compliance with international guidelines,</li> <li>(iii) Strengthening the responsibilities and functions of the Compliance Officer by reinforcing functional independence and eliminating quarterly reports as the Audit Committee disappeared under the Bylaws,</li> <li>(iv) Inclusion of the update of the Manual at least every two (2) years and its corresponding approval by the Board of Directors,</li> <li>(v) Adjustment in the functions of the Statutory Auditor including the provisions of Article 207 of the Code of Civil Procedure (duty to inform irregularities detected),</li> <li>(vi) Modification of the role, composition and functions of the Ethics Committee in line with the structure of the Committee (elimination of the Director of Technology, Director of Strategic Planning and Innovation and inclusion of the Director of Risk Management and Internal Control, among other clarifications,</li> </ul>	Manager Judicial Petitions, Transparency and Business Ethics - Alejandro Baena Jaramillo	23-Dec-2025

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	<ul style="list-style-type: none"> <li>(vii) Adjustment in the regulatory referral and the drafting of the articulation with SAGRILAFI,</li> <li>(viii) New number of emerging risks in relation to virtual assets and cryptoassets,</li> <li>(ix) Addition of the proportionality criterion in the Due Diligence section, the need to apply due diligence to PEPs as well as a review of regulatory compliance with applicable Colombian legislation by eliminating FCPA,</li> <li>(x) Addition of the section administration and conservation of records and evidence, in line with the Company's document management policy,</li> <li>(xi) Inclusion of the following sections: Limitation of Strict Liability, Independence and Non-Interference, Principle of Sufficient and Reasonable Evidence.</li> </ul>		
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