


<b>ANTI-CORRUPTION POLICY FOR INTERACTIONS WITH GOVERNMENT OFFICIALS CLARO COLOMBIA</b>		
Belongs to macroprocess: Business Risk Management and Revenue Assurance.	Date: Aug-5-2024	
Classification: Internal Use.	Version: 3	Code GRI-D03

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## Objective

Describe the guidelines required for interaction with government officials.


## Definitions and abbreviations

**Claro:** Trademark under which Comunicación Celular S.A. Comcel S.A., Amov Colombia S.A., Operadora de Pagos Móviles de Colombia S.A.S., Ideas Musicales de Colombia S.A.S. and Hitss Colombia S.A.S. are presented to the market.

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## 1. POLICY STATEMENT

This policy applies to: Comunicación Celular S.A. Comcel S.A., Amov Colombia S.A., Operadora de Pagos Móviles de Colombia S.A.S. Ideas Musicales de Colombia S.A.S. and Hitss Colombia S.A.S. (hereinafter "Claro Colombia" or "the Companies"), which are committed to conduct their business fairly, honorably, with integrity and in compliance with laws and regulations, including all applicable anti-corruption laws.

Claro Colombia is exposed to risk when interacting with government officials who may have the ability to make or influence decisions that affect Claro Colombia's business activities. Therefore, this policy describes the rules by which these interactions must be governed.

The purpose of this policy is to ensure the prevention, detection and control of corrupt practices, with the laws, regulations and codes of ethics applicable to public officials. Likewise, to protect Claro Colombia's reputation from any situation that suggests that we are obtaining something in exchange or to improperly influence or obtain an undue advantage.

## 2. IDENTIFICATION OF GOVERNMENT OFFICIALS

Claro Colombia defines Government Officials as any person who holds an employment, job, position or commission in the legislative, executive or judicial branch of any government, or in any autonomous public body, regardless of whether such person has been appointed or elected; any employee of a state-owned company; any political party; any candidate for a popularly elected office; any official of a public international agency or organization (such as, for example, the World Bank); and any person acting as an official representative of any of the aforementioned persons or entities. It should be noted that in some cases the aforementioned persons are not considered to be public servants under the laws of their respective countries. However, for purposes of compliance with this policy, the definition included in this document shall apply.

## 3. SCOPE


This policy is mandatory for Claro Colombia employees, Suppliers, Agents and other counterparties who interact on behalf of Claro Colombia with Government Officials.

The following groups have specific responsibilities under this Policy:

- The Compliance Officer will oversee compliance with the Policy, as well as responding to any concerns that may arise regarding the Policy.

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Claro Colombia employees must report through the available tools those interactions with Government Officials that are not within the ordinary topics of Management. Interactions with government officials that arise from what is regulated by law do not need to be recorded (for example: Hearing for the awarding of a government agreement). Interactions and reports must follow the guidelines and other processes/policies established by América Móvil. Every six months, the Compliance Officer enters SharePoint and reviews and monitors cases of interaction with Government Officials, to ensure that there is no activity that may be considered suspicious or outside the policies or guidelines established by the company.


- Hospitality, gifts or events offered (on an exceptional basis) to Government Officials must correspond to the amounts authorized in the authorization levels manual and in accordance with América Móvil's policies.

#### 4. **PERMITTED AND NON-PERMITTED ACTIVITIES WITHIN CLARO COLOMBIA WITH GOVERNMENT OFFICIALS**

- Employees of Claro Colombia or any person within the Company who is authorized to act on its behalf, may not give, promise or offer to a national or foreign public servant, directly or indirectly, sums of money, any object of monetary value or any other benefit or utility in exchange for the performance, omission or delay of any act related to the exercise of their duties and in connection with an international business or transaction, for the benefit of the latter or a third party.
- It is prohibited to give any type of donation or contribution, whether in cash or in kind, to any political party or candidate for elected office. Donations to charitable or altruistic institutions must be authorized by the Presidency.
- Claro Colombia and any person within it who is empowered to act on its behalf must refrain from financing any type of political campaign for the Presidency of the Republic, Governorships, Mayorships or any other position in the Public Administration that involves a popular election process, with contributions higher than those established by the laws applicable to the matter.
- It is forbidden to accept gifts, gratuities, invitations to events, hospitality that may generate a commitment, influence decisions or affect the company's business relations.
- All gifts, travel or lodging expenses, entertainment and/or food expenses for any public or private employee, which are not prohibited by law, must comply with the guidelines established by América Móvil. In any case, all employees of Claro Colombia are absolutely

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forbidden to offer directly or indirectly, through a third party or another person, gifts or any kind of gift to a public or private servant.

- It is forbidden to accept any trip paid by a supplier or external entity to events, conferences or symposiums. However, if it is deemed necessary to do so, the employee must ensure compliance with the authorization levels manual and América Móvil's policies/guidelines.
- Claro Colombia personnel are allowed to give certain Merchandising promotional items to public or private servants.
- It is permitted to hold meetings with public officials to discuss legitimate business activities of Claro Colombia. In the case of an Agent or Representative, the meeting must be attended by a Claro Colombia Employee who will be responsible for recording the interaction.
- It is not allowed to hire former government officials for a period of 2 years, to perform on behalf of Claro Colombia the same functions they had been performing as government officials.
- It is not allowed to hire natural persons who have served as public officials in entities that exercise inspection, surveillance or control over the companies that are part of Claro Colombia, for the provision of assistance, representation or advisory services, for a period of 2 years.

Any exception to the provisions of this policy must be approved by the Compliance Officer and the President.

#### 4.1. Meetings with Public Officials


Claro Colombia employees or any person within the Company who is authorized to act on its behalf may hold meetings with public officials to discuss business activities, provided that such meetings are conducted in accordance with applicable laws, including anti-corruption legislation.

The meetings must take place in a location that is not considered luxurious, such as:

- The offices of the public official in the country where the official works;
- At a Claro Colombia office;
- At a third party's offices.

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It is not recommended to hold business breakfasts, lunches or dinners with government officials. However, if it is deemed necessary to do so, the level of hospitality provided by Claro Colombia should conform to the following guidelines:

- That they are legal and ethical according to the laws, regulations and codes of conduct applicable to the government official and the Employee.
- Of modest value, such expenses must correspond to the amounts approved in the manual of authorization levels and in accordance with the policies of América Móvil.
- They should always be offered at Claro Colombia offices or at a suitable location, i.e., one that cannot be considered sumptuous or luxurious.
- All interactions with Government Officials must follow the guidelines or procedures established by América Móvil.

#### 4.2. Hiring government officials or relatives of government officials

Claro Colombia must not hire paid services of government officials. If there is any exception to this prohibition, it must be approved and agreed with the Compliance Officer and the President prior to the hiring.


In accordance with this policy, it is permissible for a government official to provide assistance to Claro Colombia in the form of unpaid services related to his or her official function. However, Claro Colombia will not offer any special or symbolic payment.

When a government official or former government official is interested in becoming an employee of the Company performing functions similar or related to his or her previous functions or with the same government entity, he or she may be hired by Claro Colombia, but performing functions that are not related to his or her previous duties for a period of 2 years.

In the case of the hiring of a relative or person with some degree of affinity to a government official, the suitability of such person to perform the functions must be justified, such functions must not coincide or be related to the position of the government official to whom he/she is related, and the fees to be paid must comply with the principle of "*Fair Market Value*", leaving support for the service rendered. For this purpose, the information in Annex 1 must be completed. Said information must be verified and approved by the Compliance Officer prior to the hiring.

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#### 4.3. Gifts to government officials

In Claro Colombia it is not allowed to give gifts to government officials. However, on an exceptional basis and when not prohibited by law, gifts may be given, provided that:

- Local laws and regulations are complied with.
- The value is modest and minimal (in accordance with the Merchandising Policy).
- The delivery of the gift is transparent and is registered in the tool according to the requirements of Claro Colombia.
- Under no circumstances may Claro Colombia employees or any person within the Company who is authorized to act on its behalf give cash or gift cards to government officials.
- Gifts must be in accordance with the Merchandising policy and must correspond to the amounts authorized in the authorization levels manual and in accordance with the policies of América Móvil.

#### 4.4. Responsibilities and Documentation

Claro Colombia employees who have had any interaction with a government official are responsible for ensuring that the interaction complies with the provisions of this policy, including documentation requirements.

Documentation requirements include the following documents:

- Record of the interaction must follow the guidelines established by América Móvil.
- Invoices of the interaction (if any expenses were incurred).
- Proof of the service performed by the government official or family member.


The Claro Colombia Employee will be responsible for retaining all documentation related to the interaction.

When, in exceptional circumstances, Claro Colombia makes a transfer of value or a payment, gift or invitation to a government official, it will be necessary to record certain information.

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As a good practice, it is suggested to report through the “Authorization Government Officials” Tool, to help the Compliance Officer obtain a list of interactions with government officials.

## 5. SUPERVISION

Supervision and monitoring are necessary to ensure that the provisions of this policy are complied with and that interaction records are maintained, as well as all documentation related to the exceptions approved by the Compliance Officer. These members together with the Ethics and Compliance Committee will have the power to conduct periodic reviews of compliance with the policy.

Likewise, there will be independent controls contracted by Claro Colombia in the form of surprise inspections of processes and practices, when necessary and when requested by the Compliance Officer, Ethics Committee or Presidency.

## 6. QUESTIONS OR REPORTING OF COMPLAINTS

All Claro Colombia employees or any third party who have concerns or situations to be clarified regarding the policy should contact the Compliance Officer or a member of the Ethics Committee or through the Whistleblower Portal <https://denuncias.americamovil.com/>.

Employees or any third party who have knowledge of a possible violation of this policy, the Ethics and Compliance Program or the Claro Colombia Code of Conduct, should report it to the Ethics Committee or anonymously to the Whistleblower Portal <https://denuncias.americamovil.com/>.

Claro Colombia prohibits retaliation against employees who report a possible non-compliance or suspected non-compliance with a Law, regulation, the Codes of Ethics or any of our policies.


All complaints regarding possible non-compliance with this policy will be reviewed by Claro Colombia's Ethics Committee.

If necessary, the Committee will include in the investigation additional employees or external professional experts. The results of the investigations will be documented in a written report and the Claro Colombia Ethics and Compliance Committee will take appropriate action, which will include, if appropriate, individual disciplinary action against the employee and steps to prevent similar incidents in the future.

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## 7. ANNEXES

### Annex 1. Certification of Compliance

I, (Name of consultant), duly authorized representative of (Name of agency), confirm that I, the company I represent and anyone my company or I hire, are fully aware and understand the provisions of the Foreign Corrupt Practices Act ("FCPA"), the Colombian Anti-Transnational Bribery Law 1778, the Anti-Corruption Statute Law 1474 and Claro Colombia's anti-corruption policy and that I, my company and anyone we hire have not violated these laws.

I further confirm that neither I nor the company I represent is a government entity or political party in the country where we would represent the Company and that no officer, director, shareholder, employee or agent of my company is a "government official" as that term is defined below.

"Government official" is defined as:


- Government officials holding legislative, administrative or judicial office in a state, its political subdivisions or local authorities, or a foreign jurisdiction, regardless of whether the individual was appointed or elected.
- Any person exercising a public function for the State, its political subdivisions or local authorities, or a foreign jurisdiction, whether within a public agency, or a State enterprise or entity, whose decision-making power is subject to the will of the State, its political subdivisions or local authorities, or a foreign jurisdiction.

In connection with any statement by the company, neither I, my company, nor any director, shareholder, employee or agent has offered, paid, promised to pay or authorized the payment of money or anything else of value to a government official, or to any other person knowing that all or any part of such money or thing of value would be offered or given directly or indirectly to any government official, political party or any person in general for any of the prohibited purposes listed below:

- Influencing an action or decision of an official, political party, party official or candidate in his or her official capacity;
- Inducing that official, political party or candidate to do or omit to do any action in violation of that party, official or candidate; or

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- Inducing that official, political party or candidate to use his or her influence with the government or government agency.

I confirm that in the event that I or the company I represent is hired to represent the Company, I will immediately report to Claro Colombia's Compliance Officer any activity related to the service that may constitute a violation of the FCPA, Law 1778, Law 1474 or Claro Colombia's anti-corruption policy.

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Signature Legal Representative/ Date

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Name and Title

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Company

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### Version control

Version	Change made	Responsible party for the change	Version change date
0	Initial version	Legal and Corporate Affairs Director - Hilda María Pardo	Mar-21-2017
1	Position names are updated, Hitss and Fusión Telmex - Comcel are included	Legal and Corporate Affairs Director - Hilda María Pardo	Oct-30-2019
2	The policy for reporting interactions with government officials that are not regulated by law is updated. Likewise, gift hospitality in accordance with the authorization levels manual and in accordance with América Móvil's policies	Legal and Corporate Affairs Director - Hilda María Pardo	Jun-28-2021
3	<p>Infracel is eliminated because the company is no longer legally active. The mandatory approval of all expenses by the President is eliminated. These must be in accordance with América Móvil.</p> <p>It is specified that any exception to the delivery or reception procedure must be approved by the Compliance Officer and the President.</p> <p>It is clarified that the record of the interaction must follow what is established by América Móvil and it is left as a good practice to report through the "Authorization of Government Officials" Tool.</p>	Corporate Legal and Sustainability Director- Santiago Pardo Fajardo	Aug-5-2024

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