



CLARO'S THIRD-PARTY DUE DILIGENCE ANTICORRUPTION POLICY		
Belongs to macroprocess: Supply Chain Management Policies and Relationship with Third Parties	Date: Aug-23-2023	
Classification: Internal Use.	Version: 4	
		Code <b>SCM-D02</b>

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## Objective

Describe the guidelines to be applied by employees who hire or have a relationship with third parties or any counterparty by means of a guide of procedures that the Companies must follow to initiate and maintain a relationship with a third party through a timely Due Diligence to identify, evaluate and avoid relationships with people or companies that may generate a risk of corruption and/or transnational bribery, reputation, or integrity for the Companies.

This policy is part of Claro's Business Ethics and Transparency Program (PTEE).

## Definitions and abbreviations


- **Claro:** Trademark under which Comunicación Celular S.A. Comcel S.A., Infraestructura Celular Colombiana S.A. E.S.P. Infracel S.A. E.S.P., 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.
- **Counterparties:** They are all natural persons or legal entities with which the Company has commercial, business, contractual or legal relationships of any kind. This includes, among others, distributors, representatives, advisors, business partners, agents, intermediaries, customers, contractors, managers, lobbyists, consultants or suppliers that are part of the Company's value chain.
- **Due Diligence:** It is the periodic and continuous process of review and evaluation of counterparties to identify, prevent, mitigate, control and monitor the 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, managers, employees, contractors and any other counterparty of the Company.

## 1. EXECUTIVE SUMMARY

Claro, comprised of: Comunicación Celular S.A. Comcel S.A, Infraestructura Celular Colombiana S.A E.S.P. Infracel S.A. E.S.P, 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 "the Companies"), engages third parties to perform activities and facilitate its operations. Claro takes the pertinent actions to ensure that the counterparties understand Claro's commitment to comply with laws and regulations, including all applicable anti-corruption laws and to comply with Claro's values and ethical standards in the performance of the Company's activities.

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## 2. SCOPE AND APPLICABILITY


This policy applies to employees of the Companies that hire or have relationships with third parties. Compliance with this policy ensures an adequate selection process of counterparties, i.e. partners, managers, employees, contractors and other third parties that are part of the Company's value chain, as well as the reduction of potential risks of transnational bribery and corruption associated with third parties in the development of operations and activities.

We recognize that, to carry out our operations and activities, we need to interact with third parties of various kinds to contract goods and services. This interaction can sometimes represent assuming risks of various kinds, therefore, the Companies' conviction is to initiate and/or maintain relationships only with third parties that share and implement in their operations and level of business dealings, unrestricted compliance with the Law and adherence to the ethical principles that identify us and therefore, this policy helps and seeks:

- To identify, analyze and evaluate alerts, including, but not limited to: history of ties to acts of corruption, fraud, bribery, transnational bribery, money laundering, bad practices, sanctions, litigation and links to other illegal acts; in the performance of suppliers, potential suppliers, distributors, and third parties in general, prior to the hiring or establishment of any type of relationship or ties.
- To generate benefits both for the Companies and for the commercial relationship with third parties, such as:
  - I. the identification of the existence or non-existence of warning signs regarding antecedents contrary to the ethical principles under which the Company is governed,
  - II. the protection of the Company, its shareholders, employees, administrators, investors and business partners against the existence of any contingency,
  - III. the creation and strengthening of commercial ties based on ethical principles, which may generate long-term relationships.
- It is also important to mention that due diligence is adjusted and incorporated to the flow of the existing process of "Registering, evaluating and enabling Allies and Suppliers", where the existence and suitability of allies and suppliers is evaluated and validated, in order to ensure that they comply with the standards established by the Company to initiate or continue negotiation processes and contracting of goods and/or services. It is also linked to the process called "Supply Chain Management Policies and Relationship with Third Parties" where guidelines are provided in line with the

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definitions defined by América Móvil, the Company's strategic objectives and ensuring compliance with Colombian legislation and regulations.

- From the administration of direct and temporary employees, the standards defined and aligned with the Claro business strategy are found in the general process of “Managing Human Resources” as well as “Attracting, Evaluating and Selecting Direct Candidates”, “Selecting Temporary Candidates” and “Attracting and Selecting Hitss Talent” as the case may be.
- Additionally, the Security and Risk area of the Company periodically performs a review of the employees linked to the Companies and personnel linked to allies.
- The counterparties have the mandatory duty to provide the necessary and sufficient information required to carry out the Due Diligence process, in accordance with paragraph 4 of article 12 of Law 2195/2022.

### 3. DUE DILIGENCE PROCESS

#### 3.1 General Guidelines


All Due Diligence must contain the following elements:

- The determination of the relevant good(s) or service(s) that the Third Party grants or provides to the Company.
- The identification and classification of the Third Party or counterparty according to the level of risk.
- The analysis and evaluation of the Third Party considering the classification of the determined risk level.
- The conclusions and recommendations made by the Compliance Officer and/or the evaluator, based solely on what is set forth in the evaluation file.
- If applicable, the justified decision made by the Area regarding the initiation or continuation of the relationship with the Third Party evaluated, taking into consideration the recommendation of the Compliance Officer and/or the evaluator.

#### 3.2 Initial Counterparty Risk Classification

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The following is the classification defined by Claro for third parties, based on the level of risk they represent for the Companies depending on the counterparty - risk factor and/or type of activity:

### 3.2.1 Risk: High

Counterparty – Risk Factor	Type	Definition
THIRD PARTY PROVIDERS	Suppliers and Contractors	Suppliers and Contractors entered from the Supply Chain Directorate (Purchasing and Procurement).
	Properties	Those in charge of renting or leasing sites for Claro's administrative and infrastructure management.
	Financial Establishments	Third parties with whom we operate to mobilize liquidity, make investments and generally manage Claro's money.
	Allies Sales Channels	Third parties in charge of offering, marketing Claro's products and services.
	Direct interaction with public servants or government entities	Any third party that will have a relationship with or act on behalf of Claro with Public Servants or Government Entities.
	Donations	Companies and / or non-profit entities, public or private organizations that are oriented towards solidarity activities.
Employees	Employees and Collaborators	Are those people who have some kind of working relationship with Claro.
Shareholders and Administrators	Shareholders and Administrators	Those people who hold the ownership of shares in a commercial company. As well as the administrators, such as the legal representative, the liquidator, the agent, the members of boards of directors and those who, according to the bylaws, exercise or hold those functions.

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COUNTRY AND ECONOMIC SECTOR	Counterparties that due to their activity or location have a high risk of corruption and/or transnational bribery.	Counterparty located in countries with high indexes listed in the CORRUPTION PERCEPTION INDEX (CPI) or that are included in DECREE 1966/2014 or the one that takes its place.  Counterparty belonging to the economic sectors identified with higher C/ST Risk, according to the OECD report for the year 2014, including the mining-energy sector, public services, infrastructure works and the pharmaceutical sector.
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### 3.2.2 Risk: Medium

Counterparty – Risk Factor	Type	Definition
PROVIDERS	Public Entities	Multilateral Organizations, Government Entities / Public Utility Companies that offer goods and/or services to the Company.

### 3.2.3 Risk: Low

Counterparty – Risk Factor	Type	Definition
PROVIDERS	Interconnection Services (PRST)	Companies registered with the CRC in charge of interconnection

## 3.3 Warning Signs


Some warning signs that could indicate the need to report or perform a review on the correct application of existing processes or procedures, which are focused on the prevention of C/ST Risk. These warning signs can be found in Annex 2 of the Transparency and Business Ethics Program (PTEE) Manual.

## 4. AGREEMENT REQUIREMENTS AND CERTIFICATIONS

Agreements with third parties must:

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- Be approved by the Corporate Legal and Sustainability Directorate.
- Be recorded in writing.
- Contain anti-bribery and anti-corruption provisions, including compliance with anti-bribery and anti-corruption laws, such as the FCPA, Law 1778 of 2016 and compliance with Claro's values and ethical standards, in accordance with the clauses established by the Compliance Officer submitted to the agreements managers. Agreement renewals and extensions may require new *Due Diligence* at the discretion of the Corporate Legal and Sustainability Directorate.


## 5. REPORTING OF COMPLAINTS

Employees, consultants, contractors and other third parties and counterparties in general who become aware of a possible violation of this policy, the Transparency and Business Ethics Program (PTEE) Manual or Claro's Code of Ethics, may report the violation anonymously, confidentially and without retaliation to the Whistleblower Portal, by going to the following link: <https://denuncias.americamovil.com/>.

Claro prohibits retaliation against employees or third parties who report a potential or suspected violation of a law, regulation, the Code of Ethics or any of the policies.

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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 objective and scope of the document are updated	Legal and Corporate Affairs Director - Hilda María Pardo	Nov-4-2021
3	Adjustments are made to the Manual considering Chapter XIII of the Basic Legal Circular issued by the Superintendence of Corporations; the recommendations made in its visit by the Superintendence of Corporations held on April 25, 2023; as well as the reports made by the Internal Audit and Statutory Auditor.	Compliance Manager - Alejandro Baena Jaramillo	Jun-22-2023
4	Adjustments are made to the "Due Diligence Procedure" and the functions and responsibilities of the "Compliance Officer".	Compliance Manager - Alejandro Baena Jaramillo	Aug-23-2023

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