



Stakeholder Engagement Policy

Telefônica Brasil S.A.

Telefônica Brasil S.A.

Approved by the Board of Directors of Telefônica Brasil S.A. at a meeting held on October 14, 2025.

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PUBLIC

VERSION HISTORY

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01	04/30/2025	Creation of the Stakeholder Engagement Policy.	Matheus Lucinski – Sustainability Department.	Digital Projects and Governance Manager; Eduardo Cardoso Santos – Compliance Manager; Luiz Maurício Rocha Pedro – Compliance Manager; Daniela Valente Junqueira Ayres – Corporate Legal Manager; Fernanda Ribeiro Galante Abrahao De Mattos – Legal Manager - Appeals; Helber Spagnoli – Legal Manager - Labor; Deise Silveira – Corporate Communications Manager; Marcelo Desiro – Purchasing Governance Manager; Assunta Vieira de Campos – Institutional Relations Manager; Tatiana Cardoso Anicet – Investor Relations.	Executive Board meetings on 09/17/2025; Appointments, Salaries and Corporate Governance Committee on 10/14/2025; Board of Directors on 10/14/2025.

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1 DEFINITIONS

- **Supplier Chain or Supply Chain:** Suppliers who serve Telefônica (as defined below), including primary suppliers (who supply Telefônica directly) and secondary suppliers (who supply primary suppliers), thus forming a network of commercial relations.
- **Communities:** A specific social group that significantly affects or may be affected by Telefônica and which shares common opinions and values, apart from continuous interaction. It can be defined by geographic, political, social, resource limits, or any other aspect of vulnerability. Examples: community leaders, neighborhood associations, families of employees, traditional communities, indigenous peoples, etc.
- **Stakeholder Engagement:** Continuous and dynamic process of communication, collaboration, training and interaction with Stakeholders in order to understand their expectations, needs and concerns, besides building relationships of trust to integrate these perceptions into Telefônica's governance and management practices.
- **Supplier or Suppliers:** Any legal person or entity that supplies products or services to Telefônica, or that is part of its supply chain, providing services directly or indirectly to Telefônica's suppliers.
- **Stakeholders:** All individuals, groups, or entities that have an interest in or are impacted by Telefônica's operations. These include employees, customers, suppliers, strategic partners, shareholders, regulatory bodies, civil society organizations, and any other party that influences or is influenced by Telefônica's operations.
- **Responsible Business Principles (RBP):** Code of ethics of Telefônica Brasil S.A., which comprises the practices, values, and principles designed to ensure that Telefônica's operations are conducted ethically, responsibly, and sustainably. The RBP encompasses stakeholder relations and aims to minimize negative impacts while maximizing social and environmental benefits.
- **Transparency:** Principle that ensures that Telefônica shares material information in a clear, accessible and timely manner with its Stakeholders, always seeking trust and clarity in its actions and decisions.

2 PURPOSE

This document defines and guides Telefônica on the responsible business guidelines that govern its relations with its key Stakeholders. These guidelines follow market best practices and, through transparent relations and effective dialogue, we can establish trustful relationships that encourage collaborative actions.

Telefônica Brasil S.A. is aware of the importance of managing Stakeholder Engagement as it aligns expectations, mitigates risks, and strengthens its reputation, which is crucial to its strategy of long-term sustainability, value generation and innovation, and establishing strategic alliances that benefit all. It is an important support tool for Telefônica in achieving its business objectives.

This policy seeks to follow market best practices and underscores Telefônica's commitment to society as a whole and the environment. This commitment is derived from and is expressed in

the Responsible Business Principles (RBP) of Telefônica Brasil S.A. and influences its approach in its internal policies, management systems, contractual relations, business offerings, partnerships, and institutional projects, among others.

3 SCOPE AND APPLICABILITY

This policy mandatorily applies to Telefônica Brasil S.A. (“Company”) and all its subsidiaries, with the following characteristics: companies in which Telefônica Brasil S.A. holds, directly or indirectly, the majority of shares, interest or voting rights, or in whose management body or board of directors it has appointed, or has the power to appoint, the majority of its members, and effectively exercises control (“Subsidiaries”). For the purposes of this document, “Company” and “Subsidiaries” are collectively referred to as “Telefônica”.

The guidelines and definitions contained in this policy are based on Telefônica's principles and values and are consolidated in its business strategy – including its code of ethics, key internal standards and double materiality analyses – as well as its activities, which include and relate to these Stakeholders.

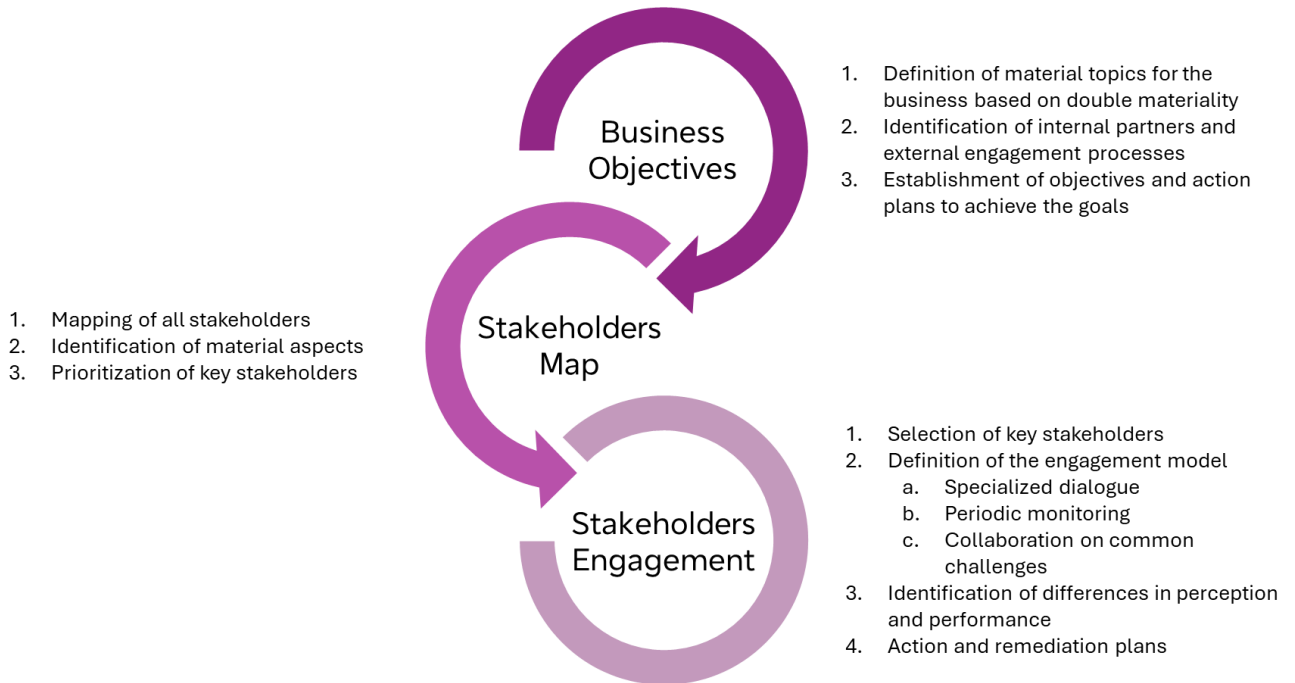
These engagement guidelines involve constant dialogue and consultations, as well as a process of continuous improvement, which contribute to the changes and bring valuable lessons to Telefônica. This entire process enables us to define Telefônica’s short-, medium-, and long-term business goals, and monitor its ability to meet Stakeholder expectations.

4 REFERENCE DOCUMENTS

- Responsible Business Principles of Telefônica Brasil S.A.;
- Anti-Corruption Policy of Telefônica Brasil S.A.;
- Human Rights Policy of Telefônica Brasil S.A.;
- Corporate Communication Regulations of Telefônica Brasil S.A.;
- Regulation on Communication of Information to the Markets of Telefônica Brasil S.A.;
- Policy on the Internal Information System (Whistleblower Channel) of Telefônica Brasil S.A.;
- Supply Chain Sustainability Policy of Telefônica Brasil S.A.

5 GENERAL WORKING PRINCIPLES

5.1 STAKEHOLDER ENGAGEMENT



Telefônica undertakes to establish and maintain a continuous process of engagement with its key stakeholders, based on transparency and effective dialogue, with the goal of building mutually trustful relationships. These relationships are essential for identifying the most significant issues facing stakeholders and for identifying the evolving trends in sustainability.

The relevance of these topics is integral to the process of assessing the impacts, risks, and opportunities, using the double materiality methodology. The double materiality process involves shareholders, investors, employees, customers, suppliers, associations, NGOs, and industry regulators through qualitative interviews and other research mechanisms.

This continuous engagement guides the definition of short-, medium- and long-term business goals, besides helping to monitor Telefônica's capacity to meet the expectations of its Stakeholders.

Stakeholder Management is based on the following principles:

- **Collaboration:** foster cooperation with Stakeholders to mature and advance Telefônica's purpose of "Digitalizing to Get Closer" and contribute to the Sustainable Development Goals (SDGs) of the UN 2030 Agenda.
- **Consensus:** creation of shared value by participating in working groups established by industry or sustainability organizations, taking into account the views and expectations of local communities.

- Continuous improvement: regularly review Telefônica's communication mechanisms and channels for dialogue with Stakeholders to make engagement as easy, effective and collaborative as possible, according to the needs of each moment.
- Transparency: share true, relevant, complete, clear and useful information.

Stakeholders are identified and regularly reviewed in a process involving various areas. After identification, Stakeholders are classified and prioritized according to Telefônica's business model. Based on this prioritization, the company devises the relationship strategy and tools for dialogue with each stakeholder group, as well as all the communication channels necessary for direct dialogue with all Stakeholders. Telefônica also holds periodic consultations with Stakeholders to:

- Report the most critical social, environmental and governance issues for Telefônica.
- Obtain information on sustainability trends around the world and identify best practices in this field that may be of interest to Telefônica.
- Obtain information about its sustainability performance from the individual perspective and experience of each panel member.
- Provide advice on improvements to Telefônica's sustainability strategy, as well as the issues addressed by its policies and initiatives, among others.
- Validate Telefônica's double materiality process and matrix.

5.2 ENGAGEMENT METHODS

Telefônica uses various engagement methods to interact with its Stakeholders, ensuring that all opinions are heard and their expectations are met in a transparent and collaborative manner. The methods adopted, their goals, and examples of their application are described below:

1. Report/Disclose

Description: Telefônica's one-way communication to Stakeholders aimed at keeping them informed of practices or new developments that could affect them.

Goal: To keep Stakeholders informed regularly and in an accessible manner, through newsletters, letters, reports, presentations, videos, interviews and publications in the press and on Telefônica's digital channels, and other communication channels.

Key Objective: Transparency. The sharing of information is designed to build trust and demonstrate Telefônica's willingness to engage with its Stakeholders.

2. Consult

Description : Telefônica seeks the opinions of Stakeholders to identify trends, assess impacts, determine risks and support decision-making.

Goal: To measure and evaluate the perceptions of Stakeholders using surveys, focus groups, public meetings, workshops and discussion forums, among others.

Key objective: Transparency and listening. Value Stakeholders' comments and perspectives, creating an environment of trust.

3. Participate/Engage in Dialogue

Description: A bidirectional and/or multilateral process in which Stakeholders play a significant role in decision-making. The conclusions may be implemented or referenced within Telefônica's hierarchy.

Goal: To promote in-depth debate and active engagement through Advisory Boards, working groups, interviews and surveys.

Key objective: Transparency, listening, collaboration and constructive debate in pursuit of a common goal.

4. Collaborate

Description: Collaboration between Telefônica and its Stakeholders in areas of mutual interest to pursue joint results.

Goal: To establish active partnerships, such as joint committees, joint ventures, and alliances that promote effective cooperation.

Key Objective: Transparency, listening, collaboration and building positive relationships based on a common goal.

5. Engage

Description: Provide Stakeholders with access to Telefônica's formal channels to contribute to good corporate governance and its internal processes, where applicable.

Goal: To share relevant information that may be disclosed to Stakeholders in accordance with governance processes already defined by Telefônica, and any contributions from the Stakeholders may be reported to the Board of Directors of Telefônica Brasil S.A., if applicable.

Key Objective: Effective engagement of Telefônica with Stakeholders to ensure a more inclusive governance process.

5.3 KEY STAKEHOLDERS

Telefônica provides individuals and organizations with accessible and secure networks and services so that everyone can use them, *inter alia*, to express themselves, share, and collaborate. To this end, Telefônica has identified fifteen key Stakeholder groups:

- **Customers:** Customers of all Telefônica brands, both individuals and legal entities, together with all their representative bodies. Through its business model, Telefônica helps its customers decarbonize their operations by leveraging digital transformation and connectivity as key elements to drive sustainability.
- **Employees:** Current and/or former employees of Telefônica, as well as associations and unions representing employee interests. We create a work environment that promotes diversity, as well as personal and professional development. We facilitate work-life balance by implementing remote work models and training our employees on new tools and technologies.
- **Suppliers and strategic partners:** Key companies for the provision of services, as well as Suppliers and entities and associations representing the interests of the Supply Chain. Telefônica's goal is to align its Supplier network with the Responsible Business Principles, thus creating a more sustainable environment in the industry.
- **Shareholders and investors:** Institutional investors and individuals who invest in Telefônica and/or analyze their profitability and sustainability. The Company ensures the trust of its investors, meeting their main requirements by publishing a more extensive and comprehensive set of key performance indicators (KPIs).
- **Opinion makers, communication services and channels:** Press and communication agencies, branding, advertising and digital influencers.
- **Society:** Local, regional and national communities, as well as special groups, non-governmental organizations (NGOs), companies, sustainability organizations and institutions, business and consulting associations, think tanks, business schools and universities, among other groups, analyzed and evaluated in a more comprehensive and more generalized manner.
- **Local communities:** Communities at social risk, indigenous peoples, traditional communities and other groups nearby Telefônica's operations are important stakeholders. The most vulnerable communities are those located near the facilities. Telefônica ensures that all its network infrastructure processes comply with law and prevents any type of violation.
- **Research agencies:** Entities responsible for monitoring and evaluating the performance of companies, markets or specific sectors, generating data and reports to support strategic and regulatory decisions.
- **Associations and NGOs:** Organizations that represent collective or social interest groups, dedicated to specific causes, such as human rights, the environment or social welfare, and influencing public and business policies.

- Board of directors of Telefônica Brasil S.A.: Decision-making body consisting of internal or external members, which guides the strategic guidelines and ensures that Telefônica complies with legal and ethical practices.
- Government entities: Entities responsible for creating and implementing public policies, regulating markets and social areas, and for monitoring business practices, directly influencing the business environment.
- Financial institutions: Banks, investment funds, credit unions and other entities that offer financial services, including credit, investments and insurance, which are essential for financing and sustainability of businesses.
- Consumer protection agencies: Institutions that guarantee consumer rights, oversee business practices, offer complaint channels and implement actions to improve consumption conditions.
- Regulatory bodies: Agencies or entities responsible for regulating and supervising specific sectors of the economy, making sure that companies comply with the rules and laws that ensure order and transparency in the markets.
- Business partners: Companies or individuals with which the organization establishes collaboration agreements to achieve common goals, such as product development, market expansion or resource sharing.

6 CHANNEL FOR QUERIES ON RESPONSIBLE BUSINESS PRINCIPLES

Channel available to all Stakeholders, including Suppliers and their employees, to query any aspect related to the Responsible Business Principles of Telefônica Brasil S.A., at:

https://negocioresponsable.telefonica.com/alta_consulta

7 WHISTLEBLOWER CHANNEL

The Whistleblower Channel receives reports of alleged misconduct or acts that violate any policy, work instruction, regulation, rule and procedure, or any other non-compliance with law related to issues such as legal, regulatory or contractual non-compliance, harassment, discrimination, labor conflicts, non-compliance with the “Vivo Diversity” manifesto, conflicts of interest, suspected cases of corruption (as per Federal Law 12,846/2013), favoritism, privacy and information security, internal controls and financial reporting, among others, through the following channels:

Online form: <https://canaldedenuncias.telefonica.com/#/>

Email: alert.vivo.br@telefonica.com

Telephone: 0800 650 1515

The Whistleblower Channel is accessible to employees, customers, suppliers, and the general public. All complaints received are confidential and investigated by the Inspection Department, and whistleblowers can choose to remain anonymous.

8 CONCLUSION

Non-compliance with this policy constitutes an infraction, and appropriate measures may be taken in accordance with the Policy on the Comprehensive Discipline Program, as well as applicable labor and civil laws.

The Internal Audit Department may carry out as many analyses and checks as it deems necessary to verify the correct application of the aspects contained in this document.

9 ENTRY INTO FORCE AND REVISIONS

This policy will come into effect after its approval by the Board of Directors of Telefônica Brasil S.A. and will be reviewed biannually or if updates are required.