Supply Chain Sustainability 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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VERSION HISTORY

Rev.	Date	Reason for Revision	Prepared by	Reviewed by	Approved by
01	06/01/2017	Creation of Sustainability Regulations in the supply chain	Sustainability Department	Digital Projects and Governance Div.; Intervention Operations Div.; Compliance & Prevention Div.; Corporate Legal Div.; Contract Law Div.; Labor Law Div.; Purchasing Processes Div.	Executive Board meetings on 12/05/2017.
02	02/11/2020	Creation of local policy	Sustainability Department	Operations Intervention Manager; Compliance Manager; DPO Manager; Corporate Legal Manager; Manager - Legal Appeals and Government; Labor Law Manager; Purchasing Manager.	Executive Board meetings on 06/10/2020.
03	06/25/2024	General document review Updated the topic “Scope and applicability”	Sustainability Department	Eduardo Cardoso Santos - Compliance Manager; Luiz Mauricio Rocha Pedro - Compliance Manager; Marco Antonio Hirsekorn Junior – Compliance Manager; Claudia Mary De Lima Galdioli Pansiera – Compliance Manager; Karen Scarpel Araujo Forte - DPO Manager; Daniela Valente Junqueira Ayres - Corporate Legal Manager; Bruna Ávila Fernandes Fonseca - Legal Appeals Manager; Eduardo Schneider - Labor Law Manager; Marlon de Azevedo Committee - Labor Relations; Evandro Alves das Chagas - Diversity and Inclusion; Elaine Simionato - Occupational Safety; Ana Leticia Stivanin Senatore - Socio-environmental Manager.	Executive Board meetings on 10/16/2024; Appointments, Salaries and Corporate Governance Committee on 10/21/2024; Board of Directors on 10/31/2024.

04	06/11/2025	General document review Inclusion of antitrust clause	Sustainability Department	Eduardo Cardoso Santos - Compliance Manager; Luiz Mauricio Rocha Pedro - Compliance Manager; Daniela Valente Junqueira Ayres - Corporate Legal Manager; Fernanda Ribeiro Galante Abrahao De Mattos – Legal Manager - Appeals; Otavio Henrique Dias de Leiros – Manager - Intelligence – Legal - Regulatory and Competition.	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

- **Adolescent:** According to Brazil's Statute of the Child and Adolescent (ECA), a person aged between twelve (12) and eighteen (18) is considered an adolescent.
- **Supplier Chain or Supply Chain:** Suppliers in the chain. It includes suppliers that provide services directly to Telefônica's Suppliers ("Primary Suppliers"), as well as suppliers that provide services to Primary Suppliers ("Secondary Suppliers") indirectly, and so on until the final link in the chain.
- **Conflict(s) of Interest:** A situation in which a personal interest (as defined below), whether direct or indirect, of a party involved influences (actual conflict of interest), may influence (potential conflict of interest), or creates the perception of being able to influence (apparent conflict of interest) the professional decisions to be made by the party involved, and this personal interest may conflict with the interests of Telefônica. Thus, a Conflict of Interest may arise from kinship, interest held or membership of management and/or administrative bodies of companies, or any other reason that the party involved considers limits or affects their ability to make objective decisions in the performance of their functions. For the purposes of understanding the definition of Conflict of Interest, personal interest is any type of positive or negative benefit or interest (not only financial or involving wealth) that is: a) specific to the person involved, b) of people related to the person involved, c) of people with whom the person involved has any pending litigation or a clear relationship of enmity ("reverse interest").
- **Personal Data Controller:** Natural or legal person under public or private law, responsible for making decisions regarding the processing of personal data. The person is responsible for making the main decisions regarding the processing of personal data and for defining the purpose of said processing.
- **Child:** According to the Statute of the Child and Adolescent (ECA), a child is a person aged under twelve (12).
- **Right to Digital Disconnection:** The right to digitally disconnect from work is aimed at ensuring that employees can effectively enjoy their rest time outside of working hours, or during leave and vacation.
- **Supplier or Suppliers:** For the purposes of this policy, the term Supplier or Suppliers refers to any company, entity, business partner – such as franchises and other sales channels – or legal entity that supplies any service and/or product to Telefônica (as defined below).
- **Young Apprentice:** According to law, any person aged between fourteen (14) and twenty-four (24), who is enrolled in an apprenticeship course and working as part of their vocational training. The maximum age does not apply to people with disabilities.
- **Conflict Zone Minerals:** Those that meet the following conditions:
  1. These minerals include any of those listed below:
     a. Cassiterite, a metal from which tin is extracted;
     b. Columbite-tantalite, known as coltan, from which tantalum is extracted;
     c. Gold;

d. Wolframite, the metal from which tungsten is extracted, and

2. These minerals have been extracted from the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, Republic of the Congo, South Sudan, Tanzania, Uganda, Zambia, and other countries that may in the future be considered conflict zones.

Minerals extracted from countries considered conflict zones that have received the corresponding certificate (from an independent entity) attesting that their extraction has not stimulated armed conflict and/or human rights abuses in these areas should be excluded from this definition or category.

- **Personal Data Processor:** Natural or legal person under public or private law, who processes personal data on behalf of the Personal Data Controller and in accordance with the purpose defined by them.
- **Child Labor:** Any kind of work performed by children and adolescents below the minimum age permitted by the laws of each country. In Brazil, any form of child labor is strictly prohibited until the age of fourteen (14).

2 PURPOSE

The Company (as defined below) is aware of the importance of its Supply Chain, both due to its global presence and the impact and amounts involved in its business. Hence, the Company promotes, establishes, and maintains high levels of responsibility with regard to its Suppliers, ensuring compliance not only with the quality standards of products and/or services, but also with applicable laws as well as ethical, integrity, social, environmental, and privacy standards in everything related to Telefônica's Supply Chain.

This policy has its origins in the **Responsible Business Principles of Telefônica**, which constitute the framework for the Company's relations with its diverse stakeholders and, more specifically, in **Telefônica's commitment to sustainable action across the Supply Chain**.

This policy was prepared in accordance with international standards, such as **the Business Guiding Principles and the Universal Declaration of Human Rights of the UN (“United Nations”)**, the conventions of the **International Labour Organization (“ILO”), the UN Convention on the Rights of the Child**, the **guidelines of the Organization for Economic Co-operation and Development (“OECD”), the Science Based Targets (SBTi) guide to Setting, Engaging and Achieving Supplier Targets, and the requirements of ISO Standards (“International Standards Organization”).**

This policy not only follows Telefônica's vision of business sustainability, integrity, and risk management, but also the Company's strategic plan, which is considered extremely important. Its purpose includes:

- The establishment of sustainable and mutually beneficial relations with Telefônica Suppliers.
- Compliance with applicable laws and best practices and standards in ethical and responsible behavior, social, environmental and privacy matters, not only by Telefônica and its employees, but also by its Suppliers.

Finally, this policy underscores Telefônica's commitment to the **United Nations Global Compact in terms of corporate social responsibility**, **the Fight against Corruption**, **Sustainable Development Goals** and the protection of **Human Rights** promulgated by the United Nations.

3 APPLICABILITY AND SCOPE

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". This policy **applies to all purchases of goods and services by Telefônica**, regardless of their operation and location.

It also **applies to Telefônica's entire Supply Chain**, covering both direct Suppliers and its own Supply Chain. In this regard, the Supplier will be jointly and severally liable for any noncompliance in their Supply Chain (which includes subcontractors) related to the minimum criteria established in this policy.

4 REFERENCE DOCUMENTS

- Responsible Business Principles of Telefônica Brasil S.A.;
- Environmental Policy of Telefônica Brasil S.A.;
- Anti-Corruption Policy of Telefônica Brasil S.A.;
- Human Rights Policy of Telefônica Brasil S.A.;
- Policy on the Comprehensive Disciplinary Program of Telefônica Brasil S.A.

5 GENERAL WORKING PRINCIPLES

Telefônica is committed to acting with the highest level of rigor, objectivity, transparency and professionalism in its relations with its Suppliers, and specifically to:

- Acting ethically and responsibly, always.
- Honoring the commitments made to Suppliers.
- Using mechanisms that favor reasonable transparency in purchasing management, especially in negotiations with Suppliers and in contracting decisions, always allowing Suppliers to ask questions or clarify any doubts they may have.
- Avoiding any action that could be interpreted as dishonest, including situations of Conflict of Interest or those that generate undue advantages for Telefônica.
- Promoting equal opportunities for Suppliers participating in a purchasing process, basing the selection of Suppliers, awarding the contract and making decisions on objective criteria.
- Encouraging a culture of responsible business among Suppliers, the adoption of mechanisms to prevent corruption and the commitment to ethics and integrity.

- Working in collaboration with Suppliers to ensure compliance with the Minimum Responsible Business Criteria (listed in section 6 of this policy) and collaborate in continuous improvement processes.
- Assessing compliance with the Minimum Responsible Business Criteria through supervision and/or independent verification, which may be based on information provided by the Supplier and/or through on-site audits. Telefônica expects Suppliers to respond to its requests for information appropriately and promptly. Depending on what Telefônica deems most appropriate, responses may be sent directly or through verification platforms that provide Telefônica or its representatives with reasonable access to relevant information about the facilities, employees, processes, etc. of Suppliers to enable said verification.
- Encouraging carbon management and reduction of greenhouse gas emissions at the Suppliers' operations.

Any person, company, or organization wishing to be considered a Telefônica Supplier must undertake to meet the Minimum Responsible Business Criteria and always cascade this obligation down to its employees and subcontractors. As such, any violation of the Minimum Responsible Business Criteria by a Supplier will be considered a breach of contract, giving Telefônica the right to terminate the contractual relationship with the Supplier and demand indemnity or significant compensation for any damages it may suffer due to the Supplier's failure and/or termination of the contract.

However, as an alternative to said termination of contract, Telefônica may reserve the right to require the Supplier to take corrective measures to restore compliance with the Minimum Responsible Business Criteria, in which case Telefônica will be solely responsible for assessing whether such corrective measures are sufficient for this purpose, in terms of content, form, and timeframe.

With regard to their employees and subcontractors, it is the responsibility of Suppliers to communicate and adequately train them regarding the terms of this policy, conduct periodic awareness actions that strengthen the culture of ethics and integrity, engage them in adopting mechanisms to combat corruption, fraud, bribery, money laundering and other illegal activities, as well as establishing procedures and norms that enable them to comply with this policy.

6 MINIMUM RESPONSIBLE BUSINESS CRITERIA

To fulfill its commitment to responsibility throughout the value chain, Telefônica requires Suppliers to comply with and promote the Responsible Business Principles, based on respect for, and the promotion of, Human Rights and three core values—integrity, commitment, and transparency—or their own equivalent principles. This commitment is achieved by meeting the following criteria:

6.1 Respect for Law as the common criterion for all criteria

- **Compliance with Law:** the Supplier must always comply with applicable international or domestic laws. When Telefônica's minimum requirement (included in this policy or in another internal regulation) is higher than the applicable law, this minimum requirement must be met.

6.2 Ethical and Responsible Criteria

- **Anti-Corruption:** Telefônica operates in accordance with (i) the laws in force, especially the Brazilian Anti-Corruption Law; (ii) professional ethics; and (iii) Telefônica's internal regulations, particularly the Anti-Corruption Policy, and does not tolerate any form of corruption, extortion, or bribery. Suppliers must actively and consistently combat any form of influence that is unlawful or unethical in relation to the decisions of Telefônica or other companies and institutions, and must act against corruption within their own company. This entails prohibiting all kinds of bribery, not permitting, facilitating, promising, offering, or giving any benefit or advantage of any kind to anyone for the purpose of influencing decisions of any type (including governmental, administrative, or judicial) or obtaining undue advantages, nor offering or accepting gifts, invitations, or other types of incentives that could reward or influence a business decision.
- **Anti-Competitiveness:** Telefônica believes in free markets and fair competition and hence it strives to make responsible and respectful decisions, complying with antitrust laws and avoiding any practice or conduct that could in any way aim to restrict or distort free market competition. As such, Telefônica requires the same conduct from its Suppliers and believes they must always reject, within their own companies, any anti-competitiveness acts, such as cartels, price-fixing, and any other practices that violate antitrust laws.
- **Conflicts of Interest:** Telefônica believes its relations with Suppliers must be based on loyalty arising from shared interests. As such, Suppliers must establish mechanisms to avoid Conflicts of Interest, ensuring their independence in situations arising within the scope of their relationship with Telefônica, as well as their full compliance with applicable laws. A Conflict of Interest is any situation in which Telefônica's interests and the Supplier's interests conflict, directly or indirectly, as well as the interests of the Supplier's employees and entities linked to them.
- **Human Rights:** As part of Telefônica's commitment to human rights, a management system is in place to ensure that its Suppliers too honor this commitment. This means they must meet the criteria established in the Human Rights Policy and the Minimum Responsible Business Criteria set forth in this policy.

  To ensure that Suppliers comply with these principles, they are required to be aware of Telefônica's internal policies. They are also asked to collaborate with initiatives designed to eliminate, in the sector, the use of minerals whose extraction results in human rights violations and/or whose revenues finance armed conflicts.

  The Company conducts due diligence of Suppliers, based on the United Nations (UN) Guiding Principles for Business and Human Rights, to identify, when applicable, priority issues for Telefônica and its stakeholders, considering their impact, risks and opportunities.

  Telefônica believes these actions are fundamental to ensuring that its Suppliers also share its values and contribute to ensuring and promoting human rights.

6.3 <u>Social Criteria</u>

- **Employment Relationship:** The work done by the Supplier's employees must be based on a recognized employment relationship established in accordance with applicable law. The Supplier must also comply with all its labor and social security obligations to its employees. Abuse of service agreements, recurrent use of subcontracting without Telefônica's consent, or fraudulent contractual relationships to avoid legal obligations will not be permitted. Employees must have an employment contract in their native language. Employees will not be required to pay commissions for recruitment to employers, agents, or other positions during their employment. If any employee is found to have made such payments, the commission must be returned and applicable legal measures will be taken.
- **Working Hours:** The Supplier's working hours must comply with national legislation and reference standards, and the criterion that offers the highest protection to employees shall prevail. Employees will not be required to work more than 44 hours per week on a regular basis, and must have at least one day off during every seven-day period. This day must fall on a Sunday at least once a month. Any overtime required by the employer must be voluntary, not regularly requested, and always paid and/or compensated (in case of comp time) in accordance with the law or collective agreement applicable to the category. According to ILO Agreement 1 and Brazil's Consolidation of Labor Laws, Articles 62 I and II, only positions of trust and employees of contractors are exempt from time clocking. The Supplier must respect the Right to Digital Disconnection during periods of daily and weekly rest, leave, vacation or other absences, as well as respect for personal and family privacy outside the working period determined by law or in the collective agreement.
- **Wages:** The Supplier must pay the minimum wage required by applicable law in each country/state for regular working hours, overtime, and the corresponding overtime pay. In any case, payments must not be made in cash. Employees must receive clear and understandable information in writing about their working conditions regarding wages before the start of their employment relationship and detailed periodic information on their wage for the period corresponding to each wage received by them. Wage deductions as a disciplinary measure are not permitted. All disciplinary measures taken must be formally recorded.
- **Violence and Harassment at the Workplace:** Suppliers must promote an environment of zero tolerance for violence and harassment. Physical abuse or discipline, threats of physical abuse, sexual or other type of harassment, verbal abuse, and other forms of intimidation are prohibited.
- **Forced Labor and Human Trafficking:** Work must not be performed under conditions of slavery, nor must it be involuntary or forced. Employees must not be required to hand over deposits or identity documents to their employers and must be free to leave their jobs upon legally established prior notice. Suppliers must have a policy and process defined to ensure that slave labor or human trafficking occurs nowhere in their Supply Chain or their business. Whenever required by Telefônica, Suppliers must inform the measures taken to ensure that their operations and Supply Chain are free of slavery and human trafficking, as well as the progress of these measures.

- **Child and Youth Labor:** The Supplier must ensure there is no child labor in its operations or its supply chain. Adolescents under 18 who, according to local laws, are eligible for employment, will not work at night or in hazardous conditions. Any measure taken must consider the interests of adolescents, in accordance with ILO Conventions 138 "concerning the minimum age for work" and 182 "about the prohibition of the worst forms of child labor and immediate action for their elimination," and must be consistent with the UN Convention on the Rights of the Child.

- **Freedom of Association and Right to Collective Bargaining:** Employees of the Supplier and its subcontractors will have the right to form and join unions, as well as to bargain collectively in accordance with national law. The employer must establish relationships of collaboration and mutual trust with domestic and international unions in diverse countries. Employee representatives will not be discriminated against and may perform their representation functions at the workplace. If law limits the right to freedom of association and collective bargaining, the employer must consider facilitating, and not impeding, the development of parallel legal means for free and independent association and negotiation.

- **Diversity, Inclusion and Non-Discrimination:** Telefônica aims to be one of the most diverse companies in the country where it operates, having Diversity as a value and strategy among its employees and customers.

  - The Supplier will assemble diverse teams internally and ensure equal opportunities among its employees.

  - The Supplier will be committed to representing society in general and promoting the inclusion of minority groups such as Black people (Black and Brown), indigenous people, *quilombolas*, women, people with disabilities (PwD), LGBTI+ people, refugees, and/or other social groups in the regions where it operates. The Supplier will have a policy of equality and will not discriminate in hiring, compensation, access to training, promotion, termination, or retirement based on gender, gender identity, ethnic origin, caste, color, pregnancy, family status, nationality of origin, religion, age, disability, sex, marital status, sexual orientation, membership of unions or political parties, economic status, or any other circumstance. The Supplier will implement conciliation measures that promote respect for the personal and family life of its employees, respecting any and all types of family structures, facilitating the best balance between this and their labor-related responsibilities according to applicable laws.

  - The Supplier will allow its employees to practice their religion under reasonable conditions considering the work environment.

  - The Supplier must not subject its employees to medical or physical examinations that may be used against them in a discriminatory manner.

- **Health and Safety Conditions:**

  - The Supplier must provide its employees with a safe and healthy work environment in accordance with local, national and international standards, and considering the specific hazards and risks of each activity.

- The Supplier must establish preventive and adequate measures to avoid any work-related injuries and accidents, minimizing the causes of hazards and establishing strict controls and protective measures against the risks inherent to its operations.
- The Supplier must equip employees with tools to perform their functions, besides providing, whenever necessary, all individual or collective protective equipment that guarantees adequate safety conditions for work.
- The Supplier, whenever instructed, must adopt the protection measures, procedures or other occupational safety requirements established by Telefônica.
- The Supplier's employees must receive health and safety training to identify the risks associated with their functions and the work environment, as well as the practices required to minimize them. The Supplier is responsible for providing and exercising management control over all necessary training required by the Regulatory Standards (NRs) according to the risks and functions.
- To the extent possible (considering that some functions are performed outdoors), access to clean sanitary facilities, potable water and, if necessary, healthy facilities for the storage and consumption of food will be provided.
- When accommodation is provided, it must be clean, safe and meet the basic needs of employees.
- Telefônica will designate an executive who will be responsible for health and safety.
- In case of accident or public health problems that impact the Supplier, it will immediately inform Telefônica.
- In addition, the Supplier must have, or be in the process of having, a safety and health policy and procedures that meet the requirements of ISO 45001 or other internationally recognized standards.
- Suppliers contracted or other personnel working at the headquarters of Telefônica must meet all the above provisions, and their employees and independent contractors must also meet Telefônica's health and safety criteria and instructions provided by it.
- Suppliers must establish policies and procedures to manage, minimize, monitor and report the safety, industrial hygiene and occupational accident and illness risks.
- Suppliers must establish and maintain emergency response plans and procedures designed to minimize damage to life, the environment and property.
- The Supplier undertakes to report to Telefônica the indicators related to the safety, health and well-being of its employees and/or subcontractors, through the channels and within the timeframes established by Telefônica.

• **Minerals from conflict-affected and high-risk areas (conflict minerals):** Suppliers must have a clear policy and processes in place to ensure compliance with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Moreover, these policies and procedures will be aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. If Telefônica requests, Suppliers must complete the Conflict Minerals Reporting Template of the Responsible Minerals Initiative or a similar questionnaire approved by Telefônica

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to improve transparency regarding the origin of these minerals in Telefônica's value chain.

6.4 Environmental Criteria

- **Compliance with Law:** The Supplier shall always act in compliance with international, national or local environmental laws, especially with regard to waste, energy, water, emissions, noise, licensing and consumption of resources or hazardous substances.
- **Life Cycle and Preventive Action:** The Supplier must apply the precautionary principle to minimize potential environmental impacts and waste generation from its operations. For this, it must consider the entire life cycle--from raw material extraction, water consumption, production and transportation, to waste management and final disposal--always avoiding environmental contamination. To the extent possible and within the context of its relationship with Telefônica, the Supplier must ensure that it supplies products and services based on eco-design practices that take into account, among other things, energy consumption, incorporation of less polluting materials, such as those from recycling, reuse, and reparability, and avoid planned obsolescence.
- **Environmental Policy:** The Supplier must have a documented and updated environmental policy that includes a commitment to protecting the environment and biodiversity, compliance with applicable laws and continuous improvement.
- **Environmental Compliance:** Whenever requested, the Supplier must submit documentary proof of environmental compliance of its operations, through the platform designated by Telefônica.
- **Environmental Management:** Whenever applicable, the Supplier must have, or be in the process of developing, a documented environmental management system for planning, implementation, and effective control of the most important environmental aspects of its operations. This system must meet the requirements of ISO 14001 or other similar internationally recognized standards.
- **Goals and Targets:** Whenever requested, the Supplier must submit the annual environmental goals and targets related to the environmental aspects of its business: management of waste and emissions, as well as the reduction in the consumption of energy and other natural resources.
- **Climate Change:** The Supplier must take measures to minimize the impact of climate change resulting from its operations across the entire value chain (scopes I, II, and III of its greenhouse gas emissions). Furthermore, the Supplier must, whenever requested:
  - Submit the greenhouse gas inventory, preferably audited by a third party.
  - Submit its greenhouse gas emission reduction targets for scopes I and II, with the reduction targets defined for the next two years.
  - Submit its greenhouse gas emission reduction targets for scope III.
  - Present the energy efficiency and renewable energy initiatives in its operations.
- The emission reduction targets submitted by Suppliers must be science-based and must have been at least submitted to the Science Based Targets Initiative (SBTi) for validation.

To this end, the Supplier must submit an SBTi Commitment Letter or SBTi Approval Letter.

- **Biodiversity Protection:** The Supplier must take measures to reduce impacts on biodiversity, committing to the following actions:
  - Apply the mitigation hierarchy principle (avoid, minimize, restore and compensate) in all stages of production - from planning, implementation, operation and demobilization of its operations;
  - Avoid deforestation associated with its operations and/or in the Upstream and Downstream supply chain;
  - Avoid constructing buildings, warehouses, storage facilities, or any other support structure for core activities in areas protected for their ecological, biological, cultural, and scenic value.

- **Reuse of Materials:** The Supplier must reuse materials and equipment whenever possible to reduce waste generation. Equipment reused at Telefônica's plants must have its data recorded with the corresponding information, accompanied by supporting evidence on the GRETEL (Telefônica Waste Management) platform - Reuse Module, or on another platform that may replace it. The Supplier undertakes to correct any inaccurate data on the platform.

- **Waste Disposal:** The Supplier must have systematic processes and controls for managing waste, especially that arising from its operations with Telefônica, prioritizing reuse and recycling treatments whenever possible with the aim of contributing to the circular economy.

  When the Supplier manages waste derived from its operations with Telefônica, it must not send this waste to landfills, instead prioritizing recycling, whenever technology is available for this treatment.

- Waste management data must be entered into the GRETEL [1] (Telefônica Waste Management) platform or any system that may replace it, by attaching evidence required by law, such as the official Waste Transport Manifest (MTR) and Certificate of Final Destination (CDF), and cannot be transported within Brazil without the MTR or any document that may be required by law, which must be done within two weeks of delivery of the waste to the waste manager, unless expressly authorized by Telefônica. Moreover, the transport invoice, shipping invoice, or corresponding invoice is required pursuant to law and the state of the country where the waste is being moved.

- **Single-Use Plastic:** Suppliers must strive to reduce the use of single-use plastic in their supplies to Telefônica and in their internal operations, whenever possible. Suppliers must also prioritize the elimination of single-use plastic in any product supplied to all the brands linked to Telefônica.

- **Recycled Plastic:** When the use of plastic is essential**,** Suppliers must prioritize the use of recycled plastic, except for the supply of food products.

- **Plastic Packaging:** Suppliers must always strive to reduce and, whenever feasible, eliminate plastic packaging from goods sold to Telefônica.
- **Eco Rating:** Suppliers of mobile terminals to Telefônica must provide the Company with the complete results of the evaluation of each of the terminal models using the Eco Rating methodology presented by Telefônica. Similarly, during the results validation process, Telefônica or its representatives may request documentary or physical evidence to validate the results obtained from said evaluation.
- **Hazardous Substances and Chemicals:** The Supplier must comply with all laws, regulations, and requirements regarding the prohibition or restriction of specific substances. Hazardous chemicals and other materials contained in products, especially those on the Substances of Very High Concern list of the REACH Regulation (European regulation on the Registration, Evaluation, Authorization, and Restriction of Chemicals), must be identified and handled to ensure their safe use, recycling, reuse, and elimination. Their use must be avoided and, if that is not possible, must be minimized always in accordance with said regulation. The Supplier must provide electrical or electronic equipment in line with Brazil's National Solid Waste Policy and all relevant European Union standards, including, but not limited to, RoHS (a European directive that regulates the production, import, and distribution of electronic and electrical equipment, restricting the use of hazardous substances) and REACH, regardless of the country of use. Whenever requested by Telefônica, the Supplier must sign the environmental declaration on electrical or electronic equipment, expressly declaring compliance with said regulations.
- **Consumption of Materials, Resources, and Atmospheric Emissions:** The Supplier must undertake to apply eco-efficiency criteria in its operations with Telefônica, especially in the case of scarce resources, such as water. Also, the Supplier must reduce as much as possible, the emission of polluting gases into the atmosphere.
- **Refrigerant Gases:** The Supplier will not deliver equipment that contains ozone-depleting gases (such as CFCs or HCFCs), nor will it use these gases for refilling, unless expressly authorized by Telefônica. In bids, priority is given to gases that are energy-efficient and hence have a lower Global Warming Potential (GWP). For work related to the maintenance of refrigeration equipment, the Supplier must strive to prevent the atmospheric emission of these gases. Similarly, the Supplier must keep a record of the quantity (in kilograms) of each type of gas refilled, which must be reported to Telefônica in the Service Orders (SO).
- **Environmental Training:** The Supplier must prepare and implement an environmental training plan for personnel performing tasks with significant environmental impact. The plan must focus on controlling the environmental aspects associated with their tasks, as well as on how to respond to environmental emergencies. The contents of the plan may be requested by Telefônica for validation purposes when deemed necessary.

6.5 Privacy Criteria, Confidentiality of Information and Freedom of Expression

The Supplier must inform whether it has a policy or similar document containing privacy principles that reflect its commitment to protecting the personal data entrusted to it, pertaining to customers, shareholders, employees, or suppliers, in accordance with applicable international

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or national laws. As such, it must follow Telefônica's recommendations. The Supplier must sign a personal data processing agreement, listing the commitments it undertakes as a Personal Data Processor, in accordance with applicable data protection regulations.

Specifically, the Supplier, when acting as a Personal Data Processor, undertakes to:

- Process personal data solely according to Telefônica's instructions and guidelines and, under no circumstances, for its own purposes.
- Not use, under any circumstances, the information it has for any purpose other than that for which it was intended.
- Not share personal data with third parties, except with prior and express authorization from Telefônica.
- Disclose to third parties (and ensure that its employees and subcontractors do not disclose) any information or material that could be accessed and which relates to the business relationship with Telefônica, even after its termination.
- Delete or return to Telefônica all personal data at the end of the service agreement, using a procedure with maximum guarantees, without retaining any copy and ensuring that no external person (natural or legal) has knowledge of this information.
- Protect personal information and data with utmost care to ensure confidentiality and integrity. The Supplier must also take technical and organizational security measures regarding the custody, storage, and retention of data, preventing alterations, losses, or unauthorized access, in accordance with Telefônica's security standards and Brazilian laws. If at any time this security is compromised or if the Supplier becomes aware of or suspects any compromise, unauthorized disclosure, or use of personal data without consent, the Supplier must act promptly, diligently, and responsibly and notify Telefônica immediately.
- Without prejudice to the above obligations, if the Supplier acts as the Controller of Personal Data of Telefônica employees, customers and/or users, it must follow procedures that always ensure compliance with its obligations regarding collaboration with competent authorities, while also respecting the rights to privacy and freedom of expression affected.
- Suppliers that design, develop or use artificial intelligence to perform their activities for Telefônica must do so in accordance with the Principles of Artificial Intelligence or equivalent principles.

7 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, at:

https://negocioresponsable.telefonica.com/alta_consulta

8 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. Reports can be made through the following channels:

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

Email: alerta.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.

9 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.

10 ENTRY INTO FORCE

This version of the policy will come into effect after its approval by the Board of Directors of Telefônica Brasil S.A.