

TAX POLICY

Document code:	POL-10
Version:	4.0
Effective date:	15/03/2024
Type of security:	Public information

Policy approved by the Board of Director of Lorca Telecom, S.A. at its meeting of March 15th, 2024.

Author
Manuel Sigot
Head of Administration &
Taxes

Reviewed
David Perez Renovales
CFO

Approved
Board
of Directors

The Board of Directors of Lorca Telecom Bidco, S.A. (hereinafter the "Company") in accordance with the provisions of article five of the Regulations of its Board of Directors, is attributed the functions of supervision and control and, in line with best practices, is responsible for approving the Corporate Policies applicable to the Company and the companies of its group (hereinafter "MASMOVIL Group").

Pursuant to article 5.4. t) of the aforementioned Regulations, the Board is responsible for "*determining the Company's tax strategy*", which is the purpose of this document. The tax strategy is implemented, on a day-to-day basis, by the Tax team department which consists of experienced tax professionals.

1. Purpose

The Company's tax strategy consists basically of ensuring compliance with the applicable regulations and proper coordination of the tax practices of the companies in MASMOVIL Group, all within the context of pursuing the corporate interest and supporting a business strategy that averts long-term tax risks and inefficiencies in executing the business decisions.

2. Principles of application

MASMOVIL Group will apply the following guiding principles in its activities:

- a. Encourage the implementation of all those good tax practices that tend to reduce possible significant areas of uncertainty and prevent conduct that could generate such uncertainty.
- b. Facilitate the information and documentation with tax implications requested by the competent Tax Authorities as quickly as possible and with the due scope.
- c. Implement gradual improvements in tax management to allow MASMOVIL Group to abide by the planning and cooperative relationship mechanisms established by the Tax Authorities.
- d. Collaborate with the competent tax authorities in line with principles of transparency, good faith, loyalty, and mutual trust, in detecting fraudulent tax practices in the markets where MASMOVIL Group operates, so as to reduce areas of uncertainty. On a timely basis, where historical issues are identified, then these will be proactively communicated to the respective Tax Authorities if it may represent a tax risk or the loss of a benefit for the group.
- e. Include the following in the Company's public information:
 - Tax policy.
 - Taxes paid both by the Company and its Group companies.
 - Relevant litigation and open tax inspections.
 - Mechanisms or procedures established to comply with current legislation on the prevention of money laundering.

- f. Annually the tax policy is updated to ensure that it reflects recommendations and best practices.
- g. Avoid the use of opaque corporate structures or those considered tax havens for purposes other than MASMOVIL Group's normal business operations.
- h. Not to establish or operate in opaque jurisdictions or those considered tax havens for purposes other than MASMOVIL Group's normal business operations.
- i. Promote compliance with current transfer pricing regulations.
- j. Not to use prices in transactions between related companies as a mechanism to erode tax bases.
- k. MASMOVIL group's engages in tax planning where this is aligned to business and commercial reality. Where a tax rule or regulation may convey a tax advantage, MASMOVIL may use this advantage legitimately as long as this is consistent with the commercial and business policies and the group strategies.
- l. Ensure that the employees of MASMOVIL Group know and understand the obligations of compliance with the tax policy and principles of action in tax matters of the Group.
- m. Establish mechanisms to ensure compliance with applicable internal and external regulations both by Company personnel and, where appropriate, by third parties related to the company. These mechanisms are:
 - The whistleblower channel and its operating charter.
 - Crime prevention, anti-fraud and anti-corruption policy.
 - Internal control system over financial information as a mechanism to prevent and monitor internal fraud in financial information.

3. Obligations of persons with tax-related responsibilities

Members of MASMOVIL Group involved in issues or matters of tax relevance shall:

- a. Follow and fulfill MASMOVIL Group's tax guidelines to the full.
- b. Apply all laws, rules and regulations using technically sound criteria.
- c. Use the utmost professional diligence and judgment to reach well-founded conclusions.
- d. Ensure that all decisions are made at an appropriate level and supported by documentation that highlights the facts, conclusions, and risks involved.
- e. Seek advice or opinions from external advisers of recognized prestige where tax law could be open to interpretation and the significance of the matter requires this before decisions are reached and/or made.
- f. Develop and foster good working relationships with tax authorities, government agencies, and other related third parties in a professional and appropriate manner.

- g. Accomplish all necessary actions with the tax authorities in order to minimize any legal action.
- h. Review tax policies and procedures periodically to ensure they remain current at all times.

Likewise, any MASMOVIL Group employee who detects or discerns any practice that could impact or might give rise to a tax risk or fraudulent action relating to tax may formulate as many queries, complaints, or notifications of noncompliance as he/she sees fit, using the channel established in the Code of Ethics.

The tax practices set forth herein are mandatory for all members of MASMOVIL Group.

Issues of special tax relevance or complexity shall be considered to include, but are not limited to, the following:

- a. Labor issues.
- b. Changes in accounting criteria or estimates that may have tax effects.
- c. Reviews of contracts or tax clauses, price reviews for operations with related parties, tax analysis of restructuring operations, etc.
- d. Analysis of projects for mergers or acquisitions with other companies, performance or review of tax due diligence, and review of fiscal and/or tax aspects that could be included in the contract.
- e. Queries of a tax nature that may arise in any area of the Company.

4. **Control**

MASMOVIL Group, to guarantee its proper compliance with tax obligations, may establish as many internal controls as it deems necessary, as well as provide the necessary support in the matters that this may require.

Likewise, the procedures and manuals approved by the Company's Board of Directors will be implemented as internal control measures.

5. **Version log**

Current version	<i>4.0</i>	
Change history	Date	Version
	<i>22/05/2017</i>	<i>1.0</i>
	<i>29/09/2022</i>	<i>2.0</i>
	<i>03/02/2023</i>	<i>3.0</i>
	<i>15/03/2024</i>	<i>4.0</i>

Appendix - UK specific requirements

The UK tax resident companies in the Masmovil Group regard this tax strategy as meeting their requirements in accordance with UK legislation contained in paragraphs 19(2) and 22(2) of Schedule 19 in Finance Act 2016. This strategy applies to the financial year ending 31 December 2024. It will be reviewed, updated and republished annually.

References to 'tax authorities' include HMRC in the UK along with all other tax and government authorities in the countries in which the Group operates.