

## MONEY LAUNDERING PREVENTION POLICY

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*Policy approved by the Board of Director of Lorca Telecom, S.A. at its meeting of September 29<sup>th</sup>, 2022.*

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The Board of Directors of LORCA TELECOM BIDCO, S.A. (hereinafter, the "Company") has the non-delegable power to determine the Company's general policies and strategies. In accordance with the foregoing, the Board of Directors is the competent body to design the Money Laundering Prevention Policy to be applied to the Company and the companies of its Group (hereinafter referred to as MASMOVIL Group).

## 1. SCOPE

This Policy is applicable to all companies of the MASMOVIL Group, as well as to its directors, employees, and collaborators, suppliers, customers and any other party involved.

All references in this document to "money laundering" shall be understood to refer also to the financing of terrorism.

Money laundering shall be understood to mean:

- a. The conversion or transfer of assets, knowing that such assets are derived from a criminal activity or event or from participation in such activity, for the purpose of concealing or disguising the illicit origin of the assets, or of assisting persons involved in such activity to evade the legal consequences of their act;
- b. The concealment or disguise of the true nature, source, location, disposition, movement, or ownership of assets or rights over assets, knowing that they are derived from criminal activity or from participation in such activity;
- c. The acquisition, possession, or use of assets, knowing, at the time of receipt thereof, that they are derived from criminal activity or from participation in such activity;
- d. Participation in any of the actions referred to in letters a), b) and c), association to commit such actions, attempts to perpetrate them, or aiding, abetting, or advising someone to carry them out or facilitating their execution.

This shall constitute money laundering even when the conduct described in the preceding letters is carried out by the person or persons who committed the criminal activity that generated the assets.

## 2. PRINCIPLES

MASMOVIL Group is aware of the importance and impact of the prevention of money laundering and the financing of terrorism, which is why it is committed to cooperating with the authorities.

In this regard, it is expressly committed to the following principles:

- a. Implementation of adequate performance standards and control and communication systems to prevent its business units from being used for money laundering.
- b. Prohibition upon any operation with assets with the knowledge that they have arisen from a criminal activity.
- c. Prohibition upon transactions with assets of illicit origin, whenever there is knowledge of the commission or prior participation in any criminal activity.
- d. Not to conceal or cover up criminal acts, and to facilitate collaboration to the authorities for investigation of the nature, origin, location, disposition, or real ownership of criminal assets.
- e. Compliance with current regulations:
  - MASMOVIL Group is committed to regulatory compliance and, specifically, to the legislation on the prevention and suppression of money laundering and financing of terrorism, engaging all its managers and employees in this commitment, as well as third parties with which it interacts.
  - MASMOVIL Group ensures the effectiveness of its commitment to regulatory compliance with specific technical, legal, and organizational measures.
  - MASMOVIL Group adopts appropriate measures with managers, employees, and third parties, before initiating any employment, professional, or commercial relationship and during the same, in order to guarantee awareness, understanding, and observance of this policy.
- f. Risk assessment and review

MASMOVIL Group's Compliance Officer will periodically evaluate the risks of money laundering and financing of terrorism, and this work will be reviewed by the Audit and

Control Committee. In turn, the Internal Audit area will review, at planned intervals, the internal control measures adopted and implemented.

### 3. CONTROL MEASURES

MASMOVIL Group will promote the following measures:

- a. Appropriate internal control measures, and control and communication bodies, with written approval of appropriate policies and procedures for due diligence, information, document retention, internal control, risk assessment, and management, compliance assurance, and communication, to prevent and deter operations related to money laundering and financing of terrorism.
- b. Employee training.
- c. Founding its internal control procedures on a prior risk analysis, and reviewing this periodically.
- d. Performing and documenting a specific risk analysis prior to the launch of a new product, the provision of a new service, a new distribution channel, or the use of a new technology, and implementing appropriate risk management measures.
- e. Expressly notify the Group's Compliance Officer, at the email address [compliance@masmovil.com](mailto:compliance@masmovil.com), of any matter or transaction carried out by MASMOVIL Group that has any of the following characteristics:
  - There are indications or certainty that it is related to money laundering and financing of terrorism;
  - It appears inconsistent with the nature, volume of activity, or operating background, provided that in the prior analysis of the operation no financial, professional, or business justification for these operations can be discerned.
- f. Suspicious transactions shall not be executed. When abstention is not possible or could hinder investigation, the operation may be executed, with an immediate report setting out the reasons for the execution, in addition to the sections on reporting suspicious operations.

#### 4. VERSION LOG

<b>Current version</b>	2.0	
<b>Change history</b>	<b>Date</b>	<b>Version</b>
	22/05/2017	1.0
	29/09/2022	2.0