

# SUSTAINABILITY, ENVIROMENTAL AND ENERGY MANAGEMENT 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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Consejo de Administración

The Board of Directors of LORCA TELECOM BIDCO, S.A. (the “Company”) has the non-delegable power to determine the general policies and strategies of the Company.

Accordingly, the Board of Directors of the Company is responsible for designing, evaluating and continuously reviewing the corporate policies that define the guidelines that govern the Company's actions. The Board, aware that the creation of value in a sustainable manner is one of the main pillars of value creation, has approved this Sustainability, Environment and Energy Management Policy.

## **I. PURPOSE**

The fulfilment of the social interest, as defined in the Company's Articles of Association, requires the assumption of sustainability policies that favour the *"sustainable operation of [the Company's] corporate purpose"*.

One of the clearest expressions of social responsibility is the sustainability of its business model, making decisions in the present without compromising the ability of future generations to meet their own needs.

This Policy sets out the basic principles of action with regards to sustainability and the environment for all the companies in the MASMOVIL group (the “Group”), which form a framework of reference for the establishment of sustainable development objectives, as well as for the establishment and review of environmental objectives and goals and those that contribute to the continuous improvement of its energy performance. Likewise, this Policy is appropriate to the purpose and context of the Organization, as well as to the nature, magnitude and environmental impacts of its activities, products and services and is also committed to the efficient use of energy with the aim of preserving natural resources, reducing atmospheric emissions and contributing to mitigating the effects of climate change.

## **II. BASIC PRINCIPLES FOR ACTION ON SUSTAINABILITY**

It is in the Company's interest to develop a sustainability plan that will cut across all areas of the Company and identifies sustainability challenges, based on various premises including the analysis of the risk map and the expectations of our customers, our employees, our investors, our suppliers, the regulator, the general public, as well as the Company's own strategy.

The projects of the Sustainability Plan must include targets on ethical behaviour, customer focus, environmental impact and climate change, energy performance sustainable management of the supply chain, digital trust, diversity and talent management and sustainable innovation. As part of the sustainability plan, they must also embrace the development of commitments to transparency and integrity and the monitoring of the processes implemented to guarantee the Company's ethics and responsible conduct.

The creation of value for shareholders, customers and suppliers, taking care of corporate profitability as one of the bases for the future sustainability of the Company and the Group.

The promotion of the social dimension of the Group's activities, starting with service to the communities where it carries out its activities by promoting digitalisation.

### **III. BASIC PRINCIPLES OF ACTION IN ENVIRONMENTAL MATTERS**

The Company has an interest in promoting best practices with respect to the environment in order to ensure pollution prevention, minimisation of impact and energy efficiency, all based on the following principles and commitments:

- Inclusion of environmental considerations, energy efficiency programs and best practices in business decisions and processes as an integrated telecommunications operator, as well as compliance with legislation and other requirements that may be applicable in environmental and energy terms, optimising technology and process design and adopting, whenever possible, future applicable standards, particularly in the field of electrical and electronic equipment and electromagnetic fields.
- Conducting, whenever feasible and before starting any activity or relevant process, a study to assess its impact on the environment as well as the energy consumption of our operations and facilities.

- Examination of any significant effect on the environment of the Group's various activities, including those related to the responsible use of energy.
- Adoption of the necessary measures to prevent and eliminate any pollution or accidental emissions into the natural environment.
- Adoption of the necessary measures to minimise, assess and recycle waste, as far as possible, ensuring appropriate management where no other alternatives exist.
- Adoption of the necessary measures to save resources including, where possible, their reuse.
- Adoption of the necessary measures to save energy and water
- Supporting the procurement of environmentally sustainable and energy efficient products and services. Supporting design activities that consider the improvement of energy performance.
- The support of design activities that consider the improvement of energy performance
- The establishment of programmes where objectives and goals are set to continuously improve environmental and energy performance and the interaction of our products, services, offices, technical centres and communications infrastructure with the environmental and energy aspects affected by the activity, as well as the periodic review of these.
- The prevention of pollution, the reduction of environmental impacts and the efficient use of resources in the deployment, adaptation and maintenance of the communications network, offices and technical centres, as well as in the provision of services.
- Training and awareness of environmental and responsible energy use among employees, so as to ensure that their work is carried out with the utmost respect for the environment, also promoting respect for energy use with a direct effect on the environment among key suppliers.

All this will be carried out within a framework of improving environmental performance by:

- Setting environmental and energy objectives and targets.
- Applying the technical, human and economic means, as well as the availability of information, necessary to achieve the objectives and targets set.
- An assessment of the degree of compliance with such objectives and targets.

#### IV. IMPLEMENTATION AND UPDATING

The Company will promote a plan for the implementation of human rights which will form part of the social responsibility plan by promoting the principles set out in this Sustainability, Environment and Energy Management Policy and, where appropriate, to undertake future updates of its content.

The Company shall be kept permanently informed of new legislation on sustainability, environmental and energy management issues, making any necessary adaptations to this Policy and the Company's activities, in compliance with the legislation applicable at any given time.

This Policy shall be reviewed annually by the Board of Directors and shall be communicated to all personnel working for or on behalf of the Company.

#### V. VERSION LOG

<b>Current Version</b>	<i>3.0</i>	
<b>Changes History</b>	<b>Fecha</b>	<b>Versión</b>
	2018	<i>1.0</i>
	02/10/2020	<i>2.0</i>
	29/09/2022	<i>3.0</i>