

Internal Information System Management Policy

Fundación Telefónica

Approved by Fundación Telefónica's Board of Trustees at their meeting
on 13 December 2023

1st edition - December 2023

Summary of modifications

Edition	Changes
1.0	Preparation of the policy

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1. Introduction and purpose

Fundación Telefónica is governed, generally speaking, by Telefónica's Business Principles and, specifically and in view of the nature and activity carried out by the foundation, by Fundación Telefónica's **Principles of Action**, which were approved by its Board of Trustees in October 2014. By virtue of these Principles, all employees and trustees of Fundación Telefónica have the responsibility to act with **integrity, transparency and commitment**, in **strict compliance with the law and internal regulations**, as well as the duty to cooperate to prevent any person at Fundación Telefónica from acting improperly or dishonourably, actively promoting the reporting of any possible irregularity or non-compliance.

This policy (hereinafter, the "**Policy**") reaffirms the principles that guide Fundación Telefónica's commitment to the prevention, detection and response to any type of irregular conduct or unlawful or illegal act or contrary to internal regulations. In order to make this commitment effective, it is essential to implement **communication, awareness-raising and sensitisation** mechanisms for all the people who make up the organisation. Only in this way can any suspicion or doubt about a potential irregularity or non-compliance be verified and, if necessary, appropriate measures be taken to remedy its consequences and prevent such an irregularity from recurring in the future.

In this regard, Fundación Telefónica already had an internal reporting channel in place, accessible through its institutional website, whereby any non-compliance with applicable legislation and/or Fundación Telefónica's internal regulations could be informed. Mainly due to criteria of efficiency and optimisation of material and human resources, Fundación Telefónica had been using the Telefónica whistleblowing channel as a means of receiving, managing and processing this type of reports.

On the basis of the foregoing, and in compliance with the provisions of Law 2/2023, of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption (hereinafter, "**Law 2/2023**"), the purpose of this Policy is to define the general principles of the **Internal Information System** (hereinafter, also referred as "**IIS**") that Fundación Telefónica has in place to enable its stakeholders, both internal and external, to report any irregularity or act that is contrary to current law, guaranteeing the protection of reporting persons against possible retaliation.

This Policy is complemented by the management criteria set out in the Internal Information System Management Procedure and other implementing regulations.

2. Scope of application

This Policy applies to all persons who are part of Fundación Telefónica (hereinafter also referred to as the "**Foundation**"), i.e., its **employees, management personnel** and

members of the Board of Trustees. Therefore, all of them **must know, understand and comply** with the provisions contained herein. In addition, the protection measures provided for in this Policy shall apply to all those persons who, in accordance with current legislation, must be covered thereby.

As the body in charge of the representation, governance and administration of Fundación Telefónica, the Board of Trustees is responsible for approving this Policy, thereby fulfilling its function of establishing the rules, setting the necessary instruments and mechanisms for the appropriate and efficient coordination of activities related to complaints and implementing an Internal Information System that encourages active listening and dialogue with the Foundation's stakeholders, thereby complying with the provisions of the Principles of Action, the remaining internal regulations and the applicable legislation.

The **Internal Information System** established has the appropriate mechanisms to guarantee the **confidentiality** of the communications sent through the channels provided, as well as the due **protection** of the reporting person, the reported person and other persons involved in the communication of any conduct that may fall within its scope of application.

In order to publicise the new developments and communication possibilities presented by the Internal Information System, Fundación Telefónica will carry out communication and training activities in accordance with the activity plan of its Compliance function.

3. Duty to report possible irregularities and unlawful acts

All members of the Board of Trustees, management personnel and employees of Fundación Telefónica are **obliged to report any facts** of which they become aware that refer to or affect the scope of the activities carried out by the Foundation or the performance of their professional duties, and which could constitute a **possible irregularity or action contrary** to applicable legislation or the internal regulations of Fundación Telefónica, including its Principles of Action and, in particular, which could constitute a criminal act or an administrative offence, whether serious or very serious, or an alleged breach of European Union Law, in relation to activities subject to this legislation, as well as alleged irregularities in accounting matters.

4. Internal Information System Management

The Board of Trustees of Fundación Telefónica, as the body responsible for implementing the Internal Information System, and in consideration of the criteria of

efficiency, economy and independence, has entrusted the management thereof to the Chief Compliance Officer of its founder (Telefónica, S.A.), who performs his/her duties autonomously and independently, and has the necessary personal and material resources for this purpose, which will be duly notified to the Independent Whistleblower Protection Authority.

5. Access and operation of the whistleblowing channel

Fundación Telefónica's **whistleblowing channel** is the **preferred mechanism** that the Foundation makes available to all employees, managers and trustees, as well as third parties related to the Foundation (in particular, suppliers, volunteers, interns and trainees) so that they can report any information related to Fundación Telefónica that may involve:

- (i) a possible irregularity or act contrary to the **Principles of Action** or any other **internal regulation** applicable to Fundación Telefónica;
- (ii) a potential irregularity relating to **accounting issues**, **audit** matters and/or **internal control** over financial reporting issues; or
- (iii) a possible irregularity or unlawful act, including conduct that may constitute a **serious or very serious criminal or administrative offence**, as well as an **infringement of European Union Law**, in relation to activities subject thereto.

In addition, the whistleblowing channel may be used by any other person who reports information on such irregularities obtained in the context of an employment or statutory relationship that has already ended, or those whose employment relationship has not yet begun, in cases where the information has been obtained during the recruitment or pre-contractual negotiation process.

The foregoing is without prejudice to the possibility that any of the above may address reports to the **Independent Whistleblower Protection Authority** and/or any other competent authority or body.

5.1 Submission of communications or complaints

Communications or complaints may be made in writing or verbally.

The **whistleblowing channel** can be **accessed via**:

- Fundación Telefónica's institutional website, as well as Telefónica's website.
- Fundación Telefónica's intranet.

- The toll-free telephone number provided for this purpose (+34 900107689). In this case, the call will be recorded and kept as an audio recording, in accordance with applicable legislation.
- The e-mail address canaldenuncias_fundacion@telefonica.com.

Likewise, the information relating to a communication or complaint may also be provided at a **face-to-face meeting**, in accordance with the provisions of the Internal Information System Management Procedure.

The reporting person may remain anonymous. In this case, communications or **anonymous complaints** received will be treated in accordance with the guarantees established in this Policy and other implementing regulations.

Any action aimed at preventing an employee from making a report or complaint through the whistleblowing channel will be punished in accordance with the applicable labour and disciplinary rules. In addition, employees who report breaches of Labour Law in the sphere of occupational health and safety shall also benefit from the protection provided for under these specific regulations.

Those reporting communications or complaints through the whistleblowing channel must have reasonable grounds to believe that the information referred to is truthful at the time of the communication. The information system may not be used for purposes other than compliance with the Principles of Action, this Policy and other internal regulations, or the legislation in force.

Complaints made in bad faith (knowing them to be false) will be subject to disciplinary action, in accordance with the provisions of Fundación Telefónica's Collective Bargaining Agreement and other applicable regulations.

5.2 Handling of communications and complaints

All communications received through the whistleblowing channel shall be handled and processed as quickly as possible, considering the circumstances of the facts reported and other concurrent conditions. In any case, and given that Fundación Telefónica has outsourced the management of its IIS to Telefónica, S.A., the management and processing of complaints shall be carried out in accordance with the applicable regulations and in compliance with the provisions of the Telefónica's Internal Information System Management Procedure and its implementing regulations.

In any investigation, the **confidentiality** of the data provided through the whistleblowing channel shall be guaranteed, as well as the **rights** to privacy, to honour, to be heard and to refute any accusation using the means of evidence deemed appropriate for this purpose, and to the presumption of innocence of the persons under investigation.

In the event that a communication or complaint subject to the whistleblowing channel is received through a channel other than the one established or by a person other than those responsible for its management, that person must maintain **absolute confidentiality** regarding the information received and **immediately forward** the communication to the person responsible of the Internal Information System. Failure to comply with said obligation constitutes a **very serious breach** of this Policy. In this regard, training and awareness-raising initiatives will be designed and promoted so that employees know how to act in the event of receiving a communication that they are not responsible for handling.

Under no circumstances may the confidentiality of the whistleblowing channel be seen as an impediment or obstacle that restricts or conditions the possible reporting of the facts to the competent authorities, which shall be carried out in accordance with current legislation.

6. Protection of reporting persons and prohibition of retaliation

The whistleblowing channel is designed and managed to guarantee the **confidentiality** of the identity of the reporting person, of any third party mentioned in the complaint and of the actions carried out in the management and processing of the complaint, as well as the **protection of personal data**, preventing access to the corresponding information by non-authorised staff members.

The identity of the person who reports a potential irregularity through the whistleblowing channel, if revealed, shall be considered confidential information and, therefore, shall not be communicated to the person affected by the complaint or information or to any other third party without his or her consent.

Without prejudice to the abovementioned, the details of the persons making the report, if known, may be provided both to the administrative or judicial authorities, to the extent that they are required by such authorities as a result of any proceedings arising from the subject matter of the complaint or information, and to the persons involved in any subsequent investigation or judicial proceedings instituted by virtue of the investigation. Such transfer of data to administrative or judicial authorities shall always be carried out in full compliance with the legislation on the protection of personal data.

In accordance with the provisions of the applicable regulations, Fundación Telefónica shall not adopt and shall ensure that **no form of retaliation**, whether direct or indirect (including threats and attempts of retaliation), **is adopted** against persons (including employees, management personnel, members of the Board of Trustees or third parties) who have reported, in good faith, any possible irregular conduct or non-compliance through the Internal Information System.

7. Personal data protection

In the management of the whistleblowing channel, the applicable regulations on personal data protection shall be complied with.

8. Publicity

Notwithstanding the **obligation** of all **employees** of Fundación Telefónica to **know and act** in accordance with the provisions of **internal regulations** in the performance of their duties, this Policy and the existence of the whistleblowing channel will be promoted and duly circulated.

In order to achieve greater awareness of its contents, this Policy will be published both on the Fundación Telefónica's intranet (internal communication) and on its institutional website (external communication).

9. Auditing

The Internal Information System shall be subject to review by the Internal Audit Department of Telefónica, S.A., by express agreement of the Board of Trustees of Fundación Telefónica, for the purposes of assessing the correct application of the aspects regulated herein.

10. Entry into force

This Policy shall enter into force upon its approval by the Board of Trustees of Fundación Telefónica.

