

DONATIONS, PATRONAGE AND SPONSORSHIPS POLICY

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I. INTRODUCTION

The Code of Ethics of the MASMOVIL Group (hereinafter "the Group" or "the Company") establishes the principles and guidelines of business conduct under which the Company should be conducted, in order to guarantee that the actions of all its members comply with both current legislation and the strictest ethical principles.

Based on the above and on MASMOVIL's permanent effort to reduce as much as possible the possibilities of committing corrupt practices, the Board of Directors approves this Donations, Patronage and Sponsorship Policy which aims to establish the rules under which the companies belonging to the MASMOVIL Group may, within the framework of the Group's social awareness activities, (i) make contributions, in the form of donations, in favour of certain non-profit making entities, (ii) make donations and contributions to non-profit entities for the performance of general interest activities and (iii) sponsor events or activities.

II. SCOPE OF APPLICATION

This regulation is applicable to all the companies in the MASMOVIL Group at all times, as well as to all the employees and directors of the same.

III. RULES AND PROCEDURE FOR ACTION

For the purposes of this Policy, a contribution made by any company in the MASMOVIL Group to a person or entity, voluntarily and without receiving or expecting any reward, in the form of money, goods or services, is considered a donation. Donations and contributions to non-profit entities for the performance of general interest activities in the terms of Law 49/2002, are considered Patronage. And the contribution made by any company in the MASMOVIL Group (in the form of money, goods or services) in favour of a person or entity to be used for the organization of an event or activity, in exchange for promoting brands, logos or, in general, distinctive signs of the Group in the aforementioned activities or events, is considered a Sponsorship.

Donations, patronage and sponsorships made by any entity integrated in the MASMOVIL Group will comply with the following rules of action:

- Donations and patronages must be formalized in a written document to be signed by the donor and the recipient, with a review by the Legal Department and the Tax Department.
- Sponsorships must be formalized in a written document to be signed by MASMOVIL as sponsor and the organizer of the event or activity as sponsored, which must be reviewed by the Legal Department.
- Both donations and sponsorships must have a legitimate purpose, which, in the case of donations, cannot be to promote the achievement of a business benefit.
- Patronage must be made through donations and contributions to non-profit entities for the performance of general interest activities in the terms of Law 49/2002.
- Neither donations, nor patronages, nor sponsorships may be made directly or indirectly to political parties.

The Investor Relations and ESG Department, as responsible for the Group's social actions, shall be responsible for assessing and, where appropriate, proposing the formalization of any type of donation.

The Marketing Department is responsible for assessing and, if appropriate, proposing the formalization of any type of sponsorship action.

Both the Investor Relations and ESG Department and the Marketing Department may assess and propose the formalization of any type of patronage action.

Before issuing any proposal for a donation, patronage or sponsorship, the Department responsible in accordance with the previous paragraphs (Investor

Relations and ESG or Marketing) must obtain information and justification on the following points:

- Social purposes of the beneficiary or sponsored entity.
- Character of non-profit entity of the beneficiary of the patronage, in the terms of Law 49/2002.
- Identity of the managers of the recipient or sponsored entity and assessment of their qualifications and experience in their field of action.
- Analysis of the possible existence in the beneficiary or sponsored entity (or in its managers) of a history of corruption or practices contrary to the ethical principles assumed by the MASMOVIL Group in its Code of Ethics.
- Detailed information about the specific purposes and activities to which the donation made by the Company will be assigned and, in the case of sponsorships, confirmation that the contributions made by MASMOVIL will be entirely allocated to the organization of the activity or event in question.

In order to carry out these analyses, the Investor Relations and ESG and Marketing departments may seek the support of the Compliance Officer and other departments of the Company if they consider it necessary.

The decision on formalizing donations, patronage or sponsorships shall be taken by the corresponding authorized representative(s), in accordance with the internal approval procedures in force at any given time and the Policy on the Use of Powers.

IV. MONITORING AND REVIEW

The Investor Relations and ESG Department will issue an annual report on the activities regulated in this Policy and will also be responsible for proposing any updates or improvements to it that it deems appropriate.

V. VERSIONS HISTORY

Current versión	<i>2.0</i>	
Changes History	Fecha	Versión
	02/10/2020	<i>1.0</i>
	29/09/2022	<i>2.0</i>