Queries Channel Management Regulations

Telefónica, S.A.

Telefónica, S.A.
Approved by the Global Sustainability Office

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Change control

Edition	Date	Modifications
1.0	February 2019	Original document
2.0	September 2023	Update of the glossary, name of the Channel, description of the platform and procedure for processing queries.

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1. Introduction, purpose and scope of application

In line with the commitment to our stakeholders as explained in our Responsible Business Principles, the purpose of this document is to describe the functioning of our Queries Channel as regards the procedure for receiving, processing and registering queries received from any person or stakeholder on any subject related to the Telefónica Group's Responsible Business Principles, which are its code of ethics and conduct.

This procedure is applicable to all the companies that make up the Telefónica Group. For these purposes, the Telefónica Group (or "Group") is understood to be Telefónica, S.A., and those companies in which Telefónica, S.A., holds, directly or indirectly, the majority of the shares, holdings or voting rights in their share capital or on whose governing or administrative body it has appointed or has the power to appoint a majority of its members, in such a way that it effectively controls the company.

Through its status as parent company of the Group, Telefónica, S.A., is responsible for establishing the basis, tools and mechanisms necessary for adequate and efficient coordination between this Company and all the other companies that make up the Group. All the foregoing does not affect or impair the autonomous decision-making capacity of each of these companies in accordance with their own corporate interests and the fiduciary duties that the members of their management bodies have towards their shareholders.

The management of queries received will be carried out in accordance with section 6.

2. Related documents

- Telefónica's Responsible Business Principles
- Telefónica's Internal Information System Management Policy
- Telefónica's Internal Information System Management Procedure
- Global Human Rights Policy

3. Glossary

- **Queries Channel** – The Queries Channel (hereinafter, the "Channel") is the means of communication made available to any stakeholder or individual on the institutional websites of Telefónica Group companies for the purpose of making any queries related to the Company's Responsible Business Principles.

- **Queries** – For the purposes of these regulations, this term shall be understood to refer to any query received through the Telefónica Group's Queries Channel regarding the Responsible Business Principles.

  This excludes any queries regarding advertising messages, job applications, commercial claims, etc., which will be dealt with through the corresponding dedicated channel.

- **Communication Channel –** This is the means of communication made available to interested parties to check the status of the query made, to provide new information where appropriate, to contact the team in charge of responding to it and receive information on the resolution of the query.

4. Principles that govern the processing of queries

All queries will be handled in accordance with the following principles:

- **Confidentiality:** All queries are managed with strict confidentiality.

- **Diligent response:** All queries are handled with due diligence and respect. Every querying party will be answered within a reasonable period of time in accordance with the nature of the query and with the legislation in force.

- **Privacy and Security:** The Queries Channel complies with the data protection and security measures and guarantees applicable to a query mailbox of this nature.

5. Queries Channel

The Queries Channel is a secure database, owned by Telefónica, S.A., containing a record of the queries received through a form that is accessible, public and, where necessary, anonymous. The channel is available on Telefónica's institutional websites, through the following link:

[Telefónica - Canal de Consultas (telefonica.com)](telefonica.com)

Anyone who wishes to make a query should click on the "Web Form" link and will be redirected to the query form. Queries can be made anonymously if required. The fields to be filled in to make a query are as follows:

- **Language:** Drop-down with a list of the languages in which the form is available. When the user selects a language, the form is reloaded and the fields are displayed in the selected language. The Channel is available in several languages to facilitate understanding with regard to our different stakeholder groups.

- **Anonymous or non-anonymous query:** Required field. Drop-down with two query options: identifiable or anonymous.

- **Country to which the query refers:** Required field. Drop-down with the available countries to select from.

- **Topic of the query:** Required field. Drop-down with the available subject matters to select from.

- **Text of the query:** Required field. Text field to enter the query's content.

- **Relationship with Telefónica:** Optional field. Drop-down with the available relationships to select from.

- **File:** Non-required field. It is possible to attach a file related to the query if necessary.
- **Captcha:** Required field. In order to be able to submit a query, the captcha must be completed correctly.

If the user has chosen to make an identifiable query, the new mandatory fields to be filled in are as follows:

- **Name:** Required field. Name of the querying party.
- **Last name:** Required field. Surname(s) of the querying party.
- **Phone:** Required field. Telephone number of the querying party.
- **Email:** Required field. Email address of the querying party.
- **Acceptance of the Privacy Policy:** Required field. Option through which users state they have read and accept the Privacy Policy

After having filled in the form, the user must click on the "Send" button. Doing so registers the new query and displays a screen informing the user that the query has been successfully registered, with details on how to check its status by using the query identifier and password provided. The password must be changed when first accessing the Communication Channel for queries.
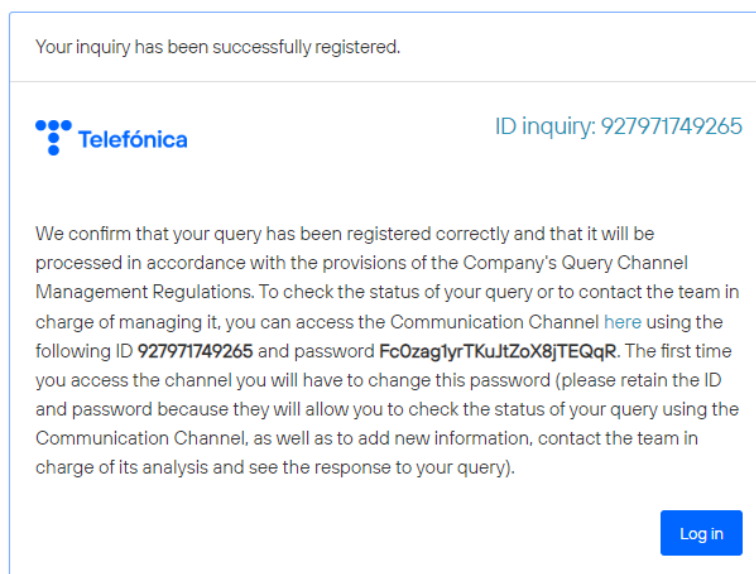
Through this new screen, by clicking on the link or on the "Log in" button, the user can track the query's status. The user will be provided with an identifier (ID) and a password so that he or she can check the status of the query made, using the Communication Channel, as well as add new information, contact the team in charge of responding and find out the outcome of the query. In order to be able to log in via the Communication Mechanism with regard to the query, **the user must make a record of his or her ID and password.**

following ID **927971749265** and password **FcOzag1yrTKuJtZoX8jTEQqR**. The first time you access the channel you will have to change this password (please retain the ID and password because they will allow you to check the status of your query using the Communication Channel, as well as to add new information, contact the team in charge of its analysis and see the response to your query).

The persons authorised to access this channel are members of the Global Sustainability Area of Telefónica, S.A. Queries are recorded in order of receipt, with the aim of monitoring all those received and detecting any erasure of information in accordance with current legislation.

6. Query processing procedure

The processing of queries received through the channel may give rise to the following scenarios:

6.1 The message received is considered irrelevant, as it is not a query related to the Responsible Business Principles or is inappropriate.

In this case, the response sent to the interested party is a predefined standard message which, depending on the circumstances, (i) informs the person who has sent the query of the other Telefónica channel which is to be used (e.g. for a commercial query) or (ii) informs said party that the Queries Channel does not handle this type of request or query (in the case of advertising messages and other inappropriate communications).

6.2 The query is relevant as it relates to the Responsible Business Principles.

Depending on the query's subject matter and the affected Group company to which the query refers, the Global Sustainability Area follows the corresponding procedure described below in order to respond to it:

6.2.1 If the query is to be processed at a global level:

- The query is referred to the relevant department at the global level.
- The corresponding global department is responsible for resolving the query raised and for drafting a response to the querying party within a reasonable period of time, taking into account the nature of the query and doing so in accordance with the legislation in force.
- The corresponding global department sends the Global Sustainability Area the response, which must be justified.
- Through the Channel's platform designed specifically for this purpose, the Global Sustainability Area will then inform the querying party of the response, based on the information provided by the corresponding global department. All communications exchanged between the Queries Channel and the querying party are displayed in the "Communications and documents" box on said platform.
- The Global Sustainability Area is responsible for registering and archiving the query file, establishing a deletion period of two years from the moment the

query is registered.

6.2.2 If the query is to be processed at the country level:

- It is referred to the sustainability area in each country, which in turn forwards it to the appropriate department for the country in question. The relevant country department is responsible for resolving the query and for drafting a response to the querying party with a response within a reasonable period of time, taking into account the nature of each query and doing so in accordance with the legislation in force.
- The relevant country department sends the Sustainability Area at country level the response, which must be justified.
- The Sustainability Area at country level informs the Global Sustainability Area of the response to the query.
- The Global Sustainability Area will then inform the querying party of the response, based on the information provided by the Sustainability Area at country level.
- The Global Sustainability Area is responsible for registering and archiving the query file.

If, as a result of processing the query, the Local Sustainability Area or the Global Sustainability Area comes to the conclusion that the query is inappropriate or irrelevant, the interested party will be informed through a suitably reasoned reply.

All actions and steps taken concerning the open query file will be recorded as they happen in the Queries Channel database.

7. Personal data protection

The personal data that may be contained in the queries received through the Queries Channel will be processed in accordance with the applicable in accordance with the applicable legislation in force on privacy and protection of personal data, the Global Privacy Policy of the Telefónica Group and the Rule on Personal Data Protection Governance Model available on **the Telefónica Group's corporate rules web.**

8. Changes and updates to the regulations

These regulations are reviewed and updated by the Telefónica Group's Global Sustainability Office.

9. Internal Audit

The Internal Audit Directorate may carry out as many analyses and verifications as it deems appropriate to verify the correct application of the aspects contained in these regulations, including the observance and compliance with the procedure included therein.

In addition, it may be submitted to external audit, in coordination with the Internal Audit Directorate, and whenever necessary in order to respond to the different external reporting requirements to which the Telefónica Group complies.

10. Entry into force

These regulations come into force upon approval by the Global Sustainability Office and its publication on the corporate rules web page, the date when the previously valid regulations shall be repealed.

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