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PTEE - ANTI-CORRUPTION AND ANTI-BRIBERY POLICY ERICSSON DE COLOMBIA S.A.S

INTRODUCTION

ERICSSON DE COLOMBIA S.A.S. (EDC), in accordance with the parameters defined by the Superintendence of Corporations in External Circular 100-000012 of 2021, is obliged to establish a Business Transparency and Ethics Program (PTEE). At EDC, we firmly believe that business ethics and integrity are essential pillars for the development of our operations. For this reason, the Shareholders, its Legal Representatives and its employees, are committed to the eradication of corruption and transnational bribery (C/ST).

OBJECTIVES

1. To comply with regulations in Colombia in the area of prevention of the risks of corruption and transnational bribery (C/ST).
2. Establish and maintain a culture of compliance, as well as guidelines for the appropriate behavior of all EDC employees in the development of its operations and in the relationship with customers, suppliers, contractors, employees and shareholders.

SCOPE

We are governed by principles and values translated in clear guidelines and local established procedures such as the Transparency and Business Ethics Program (PTTE), as well as in global directives of our parent company (the Company) aimed at the prevention of corrupt practices in the operation, as well as the implementation of mechanisms to anticipate, mitigate and prevent inappropriate conduct in the fight against corruption. These principles act as a guide for the appropriate behavior of all employees of the Company, as well as its customers, suppliers, contractors and associates.

MAIN POLICIES

The integrity of Ericsson de Colombia is unquestionable; Therefore, we have a zero-tolerance policy towards any form of corruption and financial irregularities. We expect our business partners to foster a culture of integrity based on transparency, compliance, and ethical business practices. In this regard, we highlight the following guidelines to comply with our policy:

- a. Our conduct is guided by our corporate values "Professionalism, Respect, Perseverance and Integrity".
- b. We comply with all applicable anti-corruption and anti-bribery laws and regulations in all jurisdictions in which we operate.
- c. We identify, assess, control and monitor the risks of corruption and transnational bribery that we face.



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- d. We reject any kind of gifts or gratuities that may unduly influence our business decisions or compromise our integrity.
- e. The payment of commissions is only authorized for commercial charges, provided that these are within the parameters established by the Company, after validation and corresponding authorization.
- f. We do not make financial contributions or donations to political parties, candidates or political entities.
- g. We verify that all expenses related to entertainment, food, lodging and travel are duly justified and linked to legitimate business activities of EDC.
- h. Sponsorships and donations are made as long as they comply with applicable policies and meet the specific objective of the Ericsson group.
- i. We conduct audits to verify the accuracy of accounting records and ensure transparency in EDC's financial and asset transactions, preventing any concealment of direct or indirect payments associated with corrupt practices.
- j. EDC will not carry out any type of transactions with customers or suppliers in virtual assets. The company will implement intensified due diligence measures with those counterparties that handle virtual assets and may expose the company to a greater degree to C/ST risks.

STAGES OF THE PTEE

C/ST risk management is carried out under the coordination of the Compliance Officer, together with the process leaders. The methodology used to manage risks ensures:

- a. Identify
- b. Measure
- c. Control
- d. Monitor the risks and controls defined in the sessions convened for such work.

ERICSSON DE COLOMBIA S.A.S has a risk matrix under the parameters defined by the Superintendence of Corporations and the ISO 31000 methodological benchmark.

Annually, it will be ensured that the residual risks are at the acceptance level established by EDC.

We will manage risks in accordance with established risk factors, mainly counterparties, products/services, distribution channels and jurisdictions. This work will define the segmentation by each counterparty, in order to identify possible high-risk third parties that may impact EDC.



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DUE DILIGENCE

We have procedures for knowing customers, suppliers, shareholders and employees prior to their relationship with EDC. Due diligence procedures include validating the reputation of these counterparties on binding lists and administrative, criminal, and disciplinary sanctions through the use of technological tools, identifying corruption and bribery risks based on the activity carried out, among others.

As part of the knowledge of counterparts, there will be stricter controls for the engagement of Politically Exposed Persons (PEPs).

If deemed necessary, the Compliance Officer may conduct intensified due diligence on any transaction or counterparty that raises a red flag.

The engagement of legal entity counterparts includes the identification of the final beneficiary (natural person), to whom consultation in binding and restrictive lists is applied as well as to individuals.

TRAINING AND COMMUNICATIONS

We provide regular training on the Company's anti-corruption and anti-bribery policies and procedures to our employees to ensure compliance.

We promote an environment where employees feel safe and comfortable to report any irregularities or concerns related to C/ST.

WHISTLEBLOWING CHANNEL

We provide a confidential whistleblowing channel for employees, as well as suppliers, customers and business partners (and their employees) through:

Ericsson's Compliance Line, operated by an independent third party and available 24/7, 365 days a year. It allows reports to be made in 188 countries and in more than 77 languages, which can be accessed by telephone in Colombia through the number 018009440692, through the respective Access Code in the Compliance Line link when selecting the country.

Via WEB via the link Reporting Compliance Concerns - [Compliance line - Ericsson](#)

Similarly, reports can be made to the Superintendence of Corporations:

<https://www.supersociedades.gov.co/denuncias>

Or if you prefer, you can report to the Anti-Corruption Portal of Colombia (PACO) – Secretariat of Transparency:

<https://portal.paco.gov.co/index.php?pagina=denuncie>



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SANCTIONS

Violations of this policy by any EDC employee may result in disciplinary action, including termination of employment, as well as legal action as appropriate. For EDC clients and/or suppliers, the contractual relationship may be terminated, and legal actions may be taken.

MISCELANEOUS

This policy will be reviewed periodically to ensure its effectiveness and continued relevance in the fight against C/ST.

For additional information about this policy, please contact the appropriate Ericsson representative assigned to your account or the contact numbers on this page.

This document is effective from the date of its approval.