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SAGRILAFT POLICY

INTRODUCTION

Taking into account that ERICSSON DE COLOMBIA S.A.S., as of December 31, 2023 and in accordance with External Circular 100-000016 of December 16, 2020, which amended Chapter X of the Basic Legal Circular, is obliged to implement the "Sistema de Autocontrol y Gestión del Riesgo Integral del Riesgo de Lavado de Activos, Financiación del Terrorismo y Financiamiento de la Proliferación de Armas de Destrucción Masiva ("SAGRILAFT")", in accordance with the provisions of the Superintendence of Corporations, hereby presents below its SAGRILAFT policy.

OBJECTIVES

1. To comply with regulations in Colombia regarding the prevention of risks of money laundering, financing of terrorism and financing of the proliferation of weapons of mass destruction, hereinafter ML/FT/FPADM.
2. Establish guidelines that allow EDC to shield itself from materializing possible ML/FT/FPADM risks.
3. Maintain a culture of prevention and management of risks that may affect the reputation of the company or its shareholders.

SCOPE

The SAGRILAFT policy applies to all employees hired directly by EDC. Likewise, it will be made available to our strategic allies, suppliers, contractors, and customers, in order to guide their actions under the guidelines of the SAGRILAFT policy of ERICSSON DE COLOMBIA S.A.S during our contractual relations.

EDC., its Shareholders and its Legal Representatives, have arranged the operational, economic, physical, technological measures and the necessary resources for the implementation of the SAGRILAFT and the adequate development of the audit and compliance tasks of this System, which includes:

1. The approval of the ML/FT/FPADM Policy and its updates.
2. The appointment of a Compliance Officer and his respective alternate.
3. The design of "due diligence" procedures to know its counterparties by obtaining, registering and verifying their information, including sufficient measures to know, the Beneficial Owners of customers and suppliers, as well as the periodic updating of their information.
4. Enhanced "due diligence" measures for counterparties that pose a higher risk.
5. The evaluation of the ML/FT/FPADM Risk by internal/external audits and the establishment of the corresponding action plans.



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6. The establishment of documentary procedures so that the information is allowed to meet criteria of integrity, reliability, availability, compliance, effectiveness, efficiency and confidentiality.
7. Coordination and development of internal training programs.
8. The design of the methodologies for classification, identification, measurement and control of ML/FT/FPADM Risk that will be part of SAGRILAFT.
9. The preparation of the Report of Suspicious Transactions to the UIAF and any other report or report required by the current provisions applicable to ERICSSON DE COLOMBIA S.A.S.

STAGES OF THE SAGRILAFT

ML/FT/FPADM 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.

EDC 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.

DUE DILIGENCE

The Company has adopted measures to obtain prior knowledge of the relationship of customers, suppliers, contractors, shareholders and employees. After the engagement, detection mechanisms will be applied to help identify warning signs of counterparties that, due to their characteristics and transactionality with the company, may generate suspicion of criminal activities.

As part of due diligence, we review counterparts on binding and restrictive lists, such as the UN, the United States of America terrorist list, the European Union list of Terrorist Organizations, the European Union list of Listed Terrorists and the OFAC list, for which we have technological tools.



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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 COMMUNICATION

The company informs the SAGRILAF Policy to employees, directors, members of the Shareholders' Assembly, from the first moment of joining EDC and it will be disclosed to customers and suppliers.

Training sessions are held annually for these counterparts in accordance with the internal programs defined by the Compliance Officer, which are mandatory to attend.

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](#)

REPORTS TO THE UIAF AND CONTROL ENTITIES

The Company will ensure, through the Compliance Officer, that reports of attempted and suspicious transactions are made to the UIAF in accordance with the periodicity established by said entity.

In addition, it will manage the submission of Report 75 regarding the management of SAGRILAF, Report 58 regarding the appointment of the Compliance Officer and any other report that is applicable, as established by the Superintendence of Corporations, in the times indicated by the control entity.

SANCTIONS

It is the responsibility of the Directors and collaborators to ensure strict compliance with the Policy and procedures defined by the Shareholders' Meeting for the Management of ML/FT/FPADM risk. Failure to comply entails the application of sanctions, considering it as



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a serious offense for labor purposes according to the labor contract, the Internal Labor Regulations and/or the policies of EDC.

MISCELANEOUS

This policy will be reviewed regularly to ensure its effectiveness and continued relevance in the fight against ML/FT/FPADM.

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

This document is effective as of the date of its approval.