



TIM WE COLOMBIA LTDA

CODE OF ETHICS AND CONDUCT

TIM WE COLOMBIA LTDA is focused on assuming a real commitment to each of our clients, guaranteeing effective solutions throughout the country and in the regional markets in which we are, following global trends and responding quickly to market changes.

We are aware that we act correctly with honesty and integrity, in such a way as to preserve the reputation of TIM WE COLOMBIA LTDA and the prestige of the value of our brands.

TIM WE COLOMBIA LTDA is part of a TIMWETECH business group, a leading technology company with coverage in more than 60 countries, so we must be aware that each company is seen as part of something larger and its actions can have indirect impacts on other companies, as well as on the Group as a whole.

This implies safeguarding the independence and autonomy of the business without losing sight of the fact that we are part of TIMWETECH; the business group that supports us. This philosophy will allow us to make more appropriate decisions considering both the good of the company and its impact on TIMWETECH.

CODE OF ETHICS AND CONDUCT

This document is a behavior guide and is designed to regulate our performance in different situations that we may encounter in our daily work.

The Code of Ethics and Conduct applies to all employees of TIM WE COLOMBIA LTDA, which includes:

- Board members and officers.
- Trusted employees who carry out activities on behalf of the company.
- Collaborators appointed or hired under any labor modality.

In addition, we expect our suppliers doing business with us and third parties acting on our behalf to adopt similar standards.

WHAT IS EXPECTED OF US:

That we act with integrity, complying with the Code, the legal framework and the current regulations applicable to our work. This commitment is with the company, its employees, shareholders and society.

ADDITIONAL RESPONSIBILITIES OF LEADERS

- Continuously strengthen compliance with the Code with our team.
- Be an example to continue maintaining consistency between words and actions.
- Encourage and ensure participation in training programs related to the understanding of the Code of Ethics and Conduct.
- Recognize and motivate employees to act following the values of TIM WE COLOMBIA LTDA. and the principles contained in the Code.
- Foster an environment of trust and communication so that employees can channel their queries and concerns into an open dialogue.
- When ethical issues come to our attention, we have a special obligation to report these concerns through the appropriate channel.
- Take action against breaches of the Code, preventing similar situations from happening again.

COMMITMENTS TO OUR STAKEHOLDERS

The Code of Ethics and Conduct translates the principles and values of TIM WE COLOMBIA LTDA into practical guidelines that reflect the commitment to different stakeholders.

Commitment to our employees

Diversity, and respect

- We offer an atmosphere of respect to our employees, flatly rejecting any practice that implies violation of their rights as a person, with special emphasis on their labor rights.

- Sexual harassment is not tolerated in TIM WE COLOMBIA LTDA. Sexual harassment is physical or verbal conduct of a sexual nature performed by one or more people who take advantage of a situation, against another or others who reject these behaviors. Both physical acts are considered, as well as sexual advances, gestures and other acts of a similar nature.
- We cultivate and foster team spirit, based on a shared trust, with the assurance that everyone has the personal and professional commitment to do the right thing.
- We promote a policy of moderation and respect for the ideas of others, encouraging dialogue as a tool to achieve our objectives.
- We respect our work environment, and we behave taking care of the reputation and good image of the TIMWETECH group, regardless of the geographical location where our employees carry out their work.
- We encourage the pursuit of professional growth of our employees, promote merit and continuous learning.

Safe and healthy environment

- We promote a culture of occupational health and safety based on risk prevention, whose primary purpose is to safeguard people's lives, health and integrity. We make sure to maintain a safe, healthy and productive work environment for our employees and visitors. We know that there is no goal of production, cost savings or other competitive advantage, which justifies putting at risk the physical integrity and health of any person.
- We care about providing and requiring our visitors the necessary safety and health measures, and we supervise their compliance in our facilities. At the same time, we promote the implementation of these standards, sharing them with our suppliers and customers.
- Under no circumstances do we admit the use of illegal drugs and only accept responsible consumption of alcohol under controlled conditions, during exceptional occasions such as social gatherings related to company festivities, camaraderie or business meetings.
- We take action and promptly report risks or accidents to timely apply the necessary measures.

Commitment to our Shareholders

- Responsible use of delegated authority.
- We value independence of thought and protect the trust placed in us by shareholders and their directors, committing ourselves to act and make the best decisions for the company and stakeholders, with the highest standards of ethical behavior and according to law.
- We respect and comply with the internal regulatory framework - policies, procedures, controls, established in the company, and contribute to its continuous improvement.
- We are committed to protecting the company's reputation, assets and ethical culture, so we take due precautions to prevent risks and sanction irregular acts.
- In situations of risk we consult with the appropriate levels before taking action, avoiding exceeding the authority delegated to us.
- Integrity of financial reports and operational reports.
- We ensure the correct and timely recording of transactions and operational activities, in order to provide adequate information for reporting and decision-making processes.
- We take appropriate measures for the preservation and security of company records.
- We are committed to timely presenting financial, social, environmental or other reports that reflect in an integral and transparent manner the results of the management and situation of the company, in order to preserve the confidence of shareholders and stakeholders.

PROTECTION OF ASSETS AND CONFIDENTIAL INFORMATION

We protect the Company's assets and information. We must be alert to the possibility of damage, loss, alteration, improper use or theft of the assets of TIM WE COLOMBIA LTDA.

The Company's assets include:

Negotiable instruments

- Physical, movable property
- Computer systems and other technologies, automated resources and network access.
- Intellectual property, including "software", developed by collaborators or supplied by third parties.

- We are committed to protecting the value of intellectual property, such as patents, copyrights, designs, trademarks, and trade secrets, so we encourage research and development initiatives. If you have developed, within the framework of your functions in the Company or using its facilities, an industrial design or a patentable invention, this belongs to TIM WE COLOMBIA LTDA, unless an express exception has been provided.
- We also protect the confidential information of our collaborators, clients or third parties, in accordance with laws and professional liability.
- We contribute to maintaining fair and open financial markets, being transparent and timely in the disclosure of relevant information.
- We are committed to preventing insider trading for purposes other than institutional, or for personal or third party gain.
- We keep the material or confidential information of TIM WE COLOMBIA LTDA. protected by property rights, and protect the intellectual capital of companies and third parties, being careful before reproducing, distributing, and displaying information through printed or electronic means, such as: social networks, blogs, websites, and in any other medium, where access is public and open.
- We ensure the correct use of the TIMWETECH Group's email, internet and intranet systems, thus avoiding being used to send and receive discriminatory information, inappropriate messages, chain letters and obscene material.
- In addition, we are consistent in the use of the signs and symbols of identity of our companies, since we understand that they are the reflection of who we are and how we work.

Assets held by third parties

If you have authorized third parties to keep assets in your custody, you have the responsibility to know the security procedures of TIM WE COLOMBIA LTDA and to ensure that such procedures are minimally guaranteed by the third party.

Use of Company assets outside the Company

If you regularly work at home or outside the Company, in accordance with an agreed arrangement, and property is entrusted to your custody, you must keep those assets secure. To do this, you must be aware of and follow the Company's security policies and procedures.

Protection of computer systems

Information, programs and computer systems must be protected against theft or improper use, as well as against loss or alteration, intentional or not. You have a responsibility to protect any information entrusted to you as the owner or over which you have custody or that you use.

This rule applies even when you are disposing of waste or damaged materials. You must at all times comply with established security processes and information protection requirements, including any specific requirements applicable to a system or program you use. The rules you must follow include the following:

- Use only authorized computer programs and software.
- Meet virus protection and backup requirements.
- Protect all means of access identification (e.g. passwords, access codes, ID card), combinations and physical keys in your custody; Do not give, lend, share, or duplicate them without authorization.
- When using vendor or third-party systems and programs, comply with license, confidentiality, and registration requirements that have been approved by the Company.

Failure to comply with these rules could result, for you or for TIM WE COLOMBIA LTD., in a violation of copyright laws and expose you, as well as the Company, to severe penalties. Information, programs and computer systems must be protected against theft or improper use, as well as against loss or alteration, intentional or not.

TRANSPARENCY AND INTEGRITY IN OUR ACTIONS

We protect and use the company's resources and assets responsibly, efficiently and appropriately for the business. Conflicts of interest:

Commercial and financial transactions

We face conflicts of interest in the performance of our duties, understanding that we should not influence to the detriment of TIM WE COLOMBIA LTDA, in any transaction with customers, suppliers, and competitors where we have some type of financial participation or commercial relationship, whether direct or indirect. We must always act with transparency and loyalty for the company and its shareholders.

The right of employees to participate in external activities of a financial or commercial nature, or some other form of business, is recognized and respected, insofar as these activities:

- Are legal and do not confront, interfere or conflict with the interests of the company.
- Interfere in the proper performance of their duties vis-à-vis the company.
- Involve or may cause economic damage or in the image of the company.

It is the duty of all employees of TIM WE COLOMBIA LTDA to declare the truth in case there is a conflict of interest.

CONFLICTS OF INTEREST

Gifts and attention

We undertake not to give or receive gifts and hospitality that are used with the intention of unduly influencing the decisions of the recipient, or go against the legal regulations or policies of TIM WE COLOMBIA LTDA

Procedures with Suppliers

The Company's employees in charge of purchases must attend to the following to prevent conflicts of interest:

- Avoid choosing suppliers with whom they have commercial or kinship ties.
- Avoid receiving gifts in kind or money or any type of personal benefit from suppliers with whom they have entered into business of purchasing goods or contracting services.
- Use synergies with the Head Office, and as far as possible channel purchases and contracting of services with suppliers duly registered there.

Jobs and positions outside the company

The right of employees and their families to work in the different companies in the market is recognized and respected. However, in the case of any company that is a customer, supplier or competitor of TIM WE COLOMBIA LTDA, the compliance committee must be informed, which will evaluate and approve all the mentioned statements.

APPROPRIATE USE OF COMPANY RESOURCES

- We are committed to the responsible and appropriate use of the facilities assigned by the company for travel and representation expenses.
- We report our expenses accurately, completely and reliably, and cooperate openly with the corresponding review processes.
- Responsible representation of the company and strengthening of reputation.
- We act according to the policies on behalf of the company, both internally and externally, contributing responsibly and proactively to the image and reputation of the TIMWETECH group.
- We understand that in our activities we are recognized as representatives of our company and, consequently, we develop with a professional attitude.
- We act with prudence and responsibility when selecting collaborators, suppliers, customers and strategic partners, assessing the level of economic and reputational risk, and applying procedures with due diligence.
- We are committed to requiring that third parties (partners, agents, suppliers, etc.) acting on our behalf in the public and private spheres, understand and comply with the ethical guidelines of the TIMWETECH group, so we monitor their performance.
- Commitment to our customers, suppliers and competition.
- Integrity in all markets where we participate.
- We treat our partners, customers and suppliers with dignity and respect, honoring our promised agreements and commitments.
- We develop relationships with our partners based on trust, truthfulness, mutual respect and maintaining a long-term vision.
- We are committed to maintaining the trust and loyalty of our customers through the delivery of quality products and services, and the transparent disclosure of pertinent information.
- We recognize the importance of our suppliers in achieving our goals. We are truthful, fair and careful in our negotiation, selection and exchange processes.
- We compete actively and honestly, complying with the legal standards and ethical principles that regulate the markets.
- We value and protect other companies' nonpublic information, may ask third parties about our competitors, or we accept competitive intelligence through a third party, as long as it comes from publicly available information and as long as there is no reason to

believe that the third party has a contractual or legal obligation not to disclose such information.

COMPLIANCE WITH LAWS AND REGULATIONS

We comply with the laws, regulations and rules applicable to TIM WE COLOMBIA LTDA.

We report to appropriate internal instances any suspicion of non-compliance or irregular acts by our collaborators or third parties with whom the company relates.

We always act with integrity. It is unacceptable for us to receive or pay bribes, directly or through third parties.

We are committed to preventing money laundering and financing illicit activities.

We support local and international efforts to prevent illegal activities.

SANCTIONS

It is the duty of employees and persons who provide their services to the Company to abide by the rules of this Code.

Faults or any violation of this Code and the others in force within the manuals and instructions of the Commissionist, constitutes a serious breach of the obligations that correspond to each employee as a worker.

In view of the foregoing and in the cases where appropriate, the procedures and sanctions established by law will be applied.

CONSULTATION AND COMMUNICATION

If you have a question or consider that the behavior of a collaborator violates the provisions of the code, it is your obligation to raise this information immediately preventing the issue from becoming a serious problem. We require your help to take knowledge, to evaluate the case and to adopt appropriate measures.

In such cases:

- Talk to your immediate boss.

- Consult with a member of the Compliance Committee.
- Report it through the Integrity Channel.

The Compliance Committee is made up of: the General Manager of TIM WE COLOMBIA LTDA, and the Financial and Administrative Manager.

INTEGRITY CHANNEL

The Integrity Channel is a confidential and private tool through which employees can anonymously and responsibly report their concerns regarding situations that they consider are not in accordance with the provisions of this Code of Ethics and Conduct.

The Integrity Channel should be used exclusively to express concerns related to the violation of the Code, being very clear that it is not a repository of complaints or claims.

The Integrity Channel is available to all employees and is operated by an independent and specialized company, which will receive your information confidentially and anonymously, reporting it to the Compliance Committee of TIM WE COLOMBIA LTDA, or to the Corporate Committee, as appropriate.

TIM WE COLOMBIA LTDA values and appreciates positively the individual commitment of its employees in the fulfillment of this obligation and have the firm intention of keeping free of any type of prejudice the people who report their concerns, which are expected to be in good faith.

TIM WE COLOMBIA LTDA will protect any employee who presents a concern honestly, but it is a violation of the Code to knowingly make a false accusation, or refuse to cooperate with an investigation related to the Code. Honest information does not imply being right when you report a concern, you just have to make sure that the information you provide is accurate.

Access to the Integrity Channel

You can access the integrity channel of TIM WE COLOMBIA LTDA through the following emails: hr_team_site /sandra.leon@timwe.com.

GLOSSARY OF TERMS

Shareholders - Holders of one or more shares of TIM WE COLOMBIA LTDA

Integrity channel - Tool that serves to communicate through various mechanisms (email, website, telephone service, among others) serious and sensitive concerns related to potential irregularities or breaches with the Code of Ethics and Conduct of the company. It is operated by an independent professional company specialized in the field.

Intellectual capital -Capacities, attitudes, skills and knowledge that each manager brings to their organization.

Collaborators - All direct workers belonging to companies.

Compliance Committee - Board in charge of promoting ethical behavior in the company; as well as evaluating and making decisions against breaches of the Code of Ethics and Conduct.

Conflict of interest - A situation in which our interests or personal relationships interfere with or influence the ability to make sound or impartial decisions. The very appearance of a conflict of interest can be harmful to both the individual and the company.

Harassment - Action of systematic and recurrent psychological abuse at work in which a person affects another by producing feelings of fear, terror, contempt or discouragement towards their work, can occur inside or outside the work environment.

Image - It is the set of qualities and defects that consumers or public opinion attribute to a certain company, brand, product, person or organization in general; that is, it is what the person or entity means to society, how it is perceived.

Confidential Information - Restricted access and dissemination information accessible only to those explicitly authorized to know it.

Intellectual property - Set of rights that correspond to the authors and other holders of an idea, a document or a creation of the human intellect.

Gifts and attentions - They are habitual courtesies designed to cultivate good business relationships, the practice of which is accepted as part of the culture of society.

Reputation - It is the opinion that is held about a person, a company or a group of these of our organization.

For TIM WE COLOMBIA LTDA it is a valuable intangible asset achieved thanks to the values and conduct of our founders.

Social responsibility - It is the ethical management of the company through the alignment between the requirements of the public of interest and the needs of the company, maximizing the value for both, in order to achieve sustainable development.

Bribery (corruption) - Intent or act of corrupting someone (public or private official) with money, gifts, or some favor for undue gain. It is a crime when the person who accepts or requests it is an authority or a public official.

ADDITIONAL CONSIDERATIONS

All considerations and cases not provided for in this Code of Ethics and Conduct will be treated or resolved in the Compliance Committee.