



TIM WE COLOMBIA LTDA

ANTI-CORRUPTION POLICY

Introduction

In development of the Compliance Program and the applicable regulations in the fight against Crime Prevention, TIM WE COLOMBIA LTDA is committed to the highest ethical standards in the interrelations with its stakeholders and with compliance with the laws and regulations that are applicable to it.

General Guidelines

The guidelines established in this policy should be understood according to the following definitions:

Conflict of Interest: These are those situations in which the integrity of an action leads Senior Management, Administration and the Collaborator to have to decide between acting for the benefit of the company or for their own benefit.

Public or Political Contribution: Contribution or contribution either to a political campaign or to a person linked to it.

Corruption: Dishonest activity in which a Collaborator or Contractor uses his position to obtain an undue benefit for the Company or in a personal capacity or an undue advantage, for the Company, for himself or for a third party.

Thing of value: It should be understood as "thing of value", any payment in cash or in kind, susceptible to be considered of value such as travel and reimbursement of expenses, scholarships and sponsorships, gifts in kind, donations or contributions, favorable contracts, information and promises of future employment, discounts, leisure activities, among others, regardless of their amount.

Donation: Act of generosity by which a natural or legal person freely disposes of a thing in favor of another who accepts it.

Public Official: " Public official" means any person who acts in an official capacity or under the authority of a government (national, departmental, municipal, both centralized and decentralized) to perform governmental responsibilities, on behalf of the government, agency, department, regulatory authority, or any commercial enterprise owned or controlled by the government.

Sponsorship: Financial support provided in exchange for advertising.

Policy: Guidelines or guidelines documented and communicated, through which the general guidelines aimed at meeting the strategic objectives are drawn.

Gifts and invitations : Corresponds to promotional items that are representative of a business image, as well as invitations to events related to the activity of the ordinary business company, such as breakfasts, lunches, dinners, cocktails, workshops, seminars, trips and in general activities for demonstration of services or products.

Commercial Relationship: It is one where some type of commercial agreement is carried out between two or more parties such as, for example, advice, consulting, provision of services.

Risk: Any event, threat, act or omission that at any time may compromise the achievement of the strategic and corporate objectives of TIM WE COLOMBIA LTDA, It is not limited to negative events or unexpected events; It also includes the absence or waste of opportunities.

REGULATIONS

The following laws and regulations are part of the legal framework of the Prevention Model:

1. Anti-Corruption Statute (Law 1474 of 2011): dictates rules aimed at strengthening the mechanisms for the prevention, investigation and punishment of acts of corruption.
2. Law 1778 of 2016: Contains rules on the liability of legal persons for acts of transnational corruption. Resolution 100-006261 of October 2, 2020 of the Superintendence of Companies: Transparency and Business Ethics Program.

The Anticorruption policy in TIM WE COLOMBIA LTDA, consists of a system of organization, administration and supervision to avoid, prevent and mitigate the risk of commission and / or participation of the company, regarding crimes such as:

- Money Laundering
- Terrorist financing
- Bribe
- Influence peddling

TERRORIST ASSETS AND FINANCIAL DEPARTMENT

In compliance with anti-corruption regulations, we adhere to the laws issued in order to prevent bribery and money laundering and terrorist financing. We comply with the procedures that the regulations have established for the identification of workers, business partners and identification of unusual and suspicious operations.

We oppose and denounce all kinds of terrorist or subversive activities, as well as the financing of these.

TIM WE COLOMBIA LTDA , prohibits all its collaborators and directors, from having commercial relations with companies or persons that may be involved in bribery and money laundering and terrorist financing issues. Likewise, TIM WE COLOMBIA LTDA, promotes in its commercial partners the rejection of any aforementioned activity.

If operations of the aforementioned nature are detected, communicate it to your immediate boss or use the Integrity Channel.

The collaborators of TIM WE COLOMBIA LTDA, must refrain from making statements in the media in matters related to the company, unless they are duly authorized.

We respect freedom of the press and expression. We value the role of the media as shapers of public opinion.

BRIBES

In compliance with anti-corruption regulations, TIM WE COLOMBIA LTDA prohibits its collaborators from paying, promising payment or authorizing the payment of cash, facilitation payments, money or anything of value to an official or public or private servant, national or foreign, and in general, to any person, when the purpose of this is to influence in a corrupt manner any act decision or omission to help TIM WE COLOMBIA LTDA or a third party to gain an inappropriate advantage.

INFLUENCE PEDDLING

Conflict of interest

TIM WE COLOMBIA LTDA, has a Conflict of Interest guideline designed to protect the interests of the company, help the Administration, the Control Bodies and their Collaborators to achieve high ethical and trust levels and prevent them from being faced with situations of Conflict of Interest or in the case of being so, that they are duly attended.

The Administration, Control Bodies and Collaborators of TIM WE COLOMBIA LTDA. are exposed to a situation of Conflicts of interest in situations in which a decision must be made, perform or omit an action due to their functions that is faced with personal interests, so that objectivity and judgment in the development of their work is affected.

Gifts and attentions

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

Public or political contributions

TIM WE COLOMBIA LTDA. prohibits without exception its collaborators to carry out on behalf of the Company, or in their own name with resources of TIM WE COLOMBIA LTDA, or in search of benefits for the Entity, any type of political contribution or support electoral initiatives of any kind, in accordance with current regulations.

DONATIONS

In the event that TIM WE COLOMBIA LTDA. makes donations or sponsorships, in compliance with local and international regulations on anti-corruption matters, it is prohibited to make or give any type of donation to a national or foreign official with the intention of influencing any act or omission with a corrupt purpose to help TIM WE COLOMBIA LTDA obtain an inappropriate advantage.

OTHER – Accounting Record

TIM WE COLOMBIA LTDA., must record in its accounting books all transactions derived from the business in accordance with the International Accounting Standards that are applicable to it.

All accounting transactions incurred with a third party, those derived from sponsorships and donations must be recorded in detail, so that they are easily identifiable.

Training and coaching

Within the process of induction of a new collaborator and at least annually, training and / or updating must be carried out on the Anticorruption policy, the Colombian criminal regulations, which includes:

- The commitment of TIM WE COLOMBIA LTDA. with the prevention of corruption.
- The advantages of an Anti-Corruption program.
- Events or behaviors that may constitute corruption and that must be reported.
- The mechanisms through which a complaint can be made and the guarantee of anonymity.
- The damages of committing corruption, illegal acts or unethical conduct, and the disciplinary sanctions that this implies.

Ethics line

Within the activities of detection, prevention and mitigation of corruption risks, the Ethics Line has been created, which is accessible through email sandra.leon@timwe.com (only for TIM WE COLOMBIA).

Research Processes:

- Define the mechanisms to objectively and exhaustively investigate all corruption events reported through the different mechanisms provided.
- Investigations are confidential until their disclosure, reporting and treatment to the relevant internal and/or external bodies is determined as a result of these investigations.
- The Collaborators who participate in the research process have the obligation to keep the information in total confidentiality.
- When appropriate, the competent authorities will be informed of any event of corruption and undertake and accompany the pertinent judicial actions

Sanctions

TIM WE COLOMBIA LTDA. recognizes that in the event of non-compliance with the policy and other activities arising from it, the entities and persons responsible for its application and compliance must submit to administrative, criminal and pecuniary sanctions, established in local and international laws, as well as the increase in the level of risk of the entity and the strict follow-up and monitoring of the Corporate control bodies.

Policy Officers

The Management of TIM WE COLOMBIA LTDA. is responsible for promoting an anti-corruption culture and ethical behavior, communicating the importance and responsibility of all employees in the process of preventing and reporting corruption events, and guaranteeing the necessary resources to ensure compliance with the objectives of the Anticorruption Policy.

The Company's Management, Control Bodies and Employees are responsible for knowing and understanding the Crime Prevention Policy, knowing and understanding the actions that may constitute corruption or corruption, executing the anti-corruption controls under their charge, reporting incidents and cooperating with the investigations that may arise from there.

TIM WE COLOMBIA LTDA. is responsible for incorporating the guidelines and guidelines established in the Policy to its own anti-corruption programs, through a suitable collaborator and with an attribution of appropriate authority for decision making, for this activity TIM WE COLOMBIA LTDA has appointed the Administrative and Financial Manager of the Region.