

TAX CONDUCT GUIDELINES POLICY

Approved by the Statutory Executive Board of Telefónica Brasil S.A., in a meeting held on June 22, 2022.

1. PURPOSE

This Policy sets out the *Tax Conduct Guidelines* of Telefónica Brasil S/A and its subsidiaries and controlled companies (hereinafter collectively referred to as "Telefónica" or "Company"). The principles and rules of conduct outlined herein guide our conduct and aim at ensuring the payment of taxes appropriately, in accordance with the constitutional and infra-constitutional legal system.

The *Tax Conduct Guidelines* were set out in line with our *Responsible Business Principles* and reaffirm our commitment to ethical, long-term management that promotes more ethical, fairer, and sustainable social and environmental development.

2. SCOPE OF APPLICATION

The *Tax Conduct Guidelines* shall govern activities in tax matters and shall be observed by Telefónica Brasil S/A and all its subsidiaries and controlled companies. Its principles and precepts of action shall apply to the entire operation, including new products and services, partnerships, business plans, investments in other countries, and acquisition of companies.

3. TAX CONDUCT GUIDELINES

The *Tax Conduct Guidelines*, in line with the *Principles of Responsible Business*, comprise the following principles and precepts of action:

- Compliance with tax obligations that are duly set out and in line with the constitutional and infra-constitutional legal system, required by all federal entities (the federal government, States, Federal District, and Municipalities). These obligations include, among others:
 - a) Payment of own taxes and those withheld from third parties, which are duly established and in line with the constitutional and infra-constitutional legal system;
 - b) Compliance with ancillary obligations and provision of tax information requested by the tax authorities, in accordance with the constitutional and infra-constitutional legal system;
- Appropriate documentation with a clear explanation of the tax positions adopted. For situations in which the laws are unclear or subject to interpretation, a reasonable interpretation of the law shall be made by applying the criteria expressed by doctrine and former court decisions, and, where appropriate, the opinion of third-party experts shall be consulted. Continued monitoring of these criteria ensures that the position adopted by Telefónica is sound;
- Efficiency in the management of tax litigation, through the adoption of administrative and/or judicial measures, duly substantiated, for the recovery of taxes unduly paid to the tax authorities and/or for the defense against collections in disagreement with the constitutional and infra-constitutional legal system;

- Efficient tax control and management procedures and optimization of the use of technology to ensure the quality, veracity, accuracy, and suitability of the tax data included in returns to the tax authorities and other reports;
- Commitment that every tax position observes the constitutional and infra-constitutional legal system;
- Commitment not to use tax structures without economic, financial, operational, or commercial substance. When making decisions, an exhaustive analysis of tax aspects will always be carried out. If there are several alternatives to achieve the same objective, the most efficient alternative from a tax viewpoint will be chosen, observing the economic, financial, operational, or commercial substance;
- Commitment not to use artificial structures that may jeopardize the transparency of the Company's activities vis-à-vis the tax authorities or any other stakeholders;
- Commitment neither to transfer amounts to countries and international jurisdictions defined in the laws as low tax, so that to cause the artificial displacement of tax bases, nor to use such locations, commonly referred to as "tax havens", with the primary purpose of reducing taxes;
- Commitment to comply with transfer pricing rules in transactions with related parties, which shall be carried out on an arm's length basis;
- Effort and commitment to adapt tax policy to the new digital economy environment, so that the tax burden is distributed equally throughout the digital value chain and does not hinder investments in telecommunications infrastructure, thus contributing to a fair and inclusive digital transition in line with the provisions of our *Digital Pact*;
- Relationship with tax authorities based on the principles of mutual respect, transparency, trust, and dialogue;
- Participation in various forums aimed at promoting and developing tax initiatives to foment business and improve the tax system;
- Transparency and clarity in our financial reports, to facilitate understanding of our tax affairs.

The *Tax Conduct Guidelines* aim at ensuring the confidence of internal and external stakeholders that tax issues are properly identified, managed, and considered in both tax returns and financial statements.

4. REVIEW AND SUPERVISION

The Tax Conduct Guidelines shall be reviewed annually by the Company to ensure compliance with their purpose over time, oversee their correct application, and assess their effectiveness as well as the degree of compliance in their application.

5. DISSEMINATION

Once approved by the Company, the Tax Conduct Guidelines shall be made available to all Telefônica employees via the Intranet, along with the other Telefônica Policies. Thus, the entire Company will be aware of the Tax Conduct Guidelines and undertakes to comply with them.

In addition, all people outside Telefônica, whether or not they have a direct relationship with us, as well as stakeholders (suppliers, customers, etc.) may access the Tax Conduct Guidelines on the Telefônica Brasil S/A corporate website.

6. EFFECTIVENESS

This Policy shall take effect from the date of approval at REDIR.