



# ESG DATA 2024

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This is a notebook of indicators of Telefonica Brazil (Vivo), considering its performance in environmental, social and governance aspects. The objective of this document is to present in a consolidated and transparent way to your stakeholders the management of the company's ESG indicators, aiming to connect the main information in response to the demands of ratings agencies, corporate sustainability indexes, frameworks, in addition to reaffirming the positioning and commitment to ESG best practices.

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## REFERENCES

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To facilitate access to policies and other important documents for the management of Telefonica Brazil (Vivo), this page consolidates the main policies and websites for quick access and consultation of its stakeholders.

SITES	LINKS
Investor Relations	<a href="https://ri.telefonica.com.br/em">https://ri.telefonica.com.br/em</a>
Institutional	<a href="https://www.telefonica.com.br/">https://www.telefonica.com.br/</a>
Futuro Vivo	<a href="https://vivo.com.br/a-vivo/sustentabilidade">https://vivo.com.br/a-vivo/sustentabilidade</a>
Privacy Center	<a href="https://www.vivo.com.br/a-vivo/informacoes-aos-clientes/centro-de-privacidade">https://www.vivo.com.br/a-vivo/informacoes-aos-clientes/centro-de-privacidade</a>



## CERTIFICATIONS & OTHERS

CERTIFICATIONS	STATUS
ISO50001	Successfully implemented
ISO14001	Successfully implemented
ISO27001	Successfully implemented Digital Security #VivoSegura program processes: Vulnerability Management (GVUL), Managed Detection and Response (MDR), Application Security (AppSec) and Data Protection Monitoring
ISO45001	Successfully implemented
DSC1000	Successfully implemented
ISO26000	Successfully implemented

INDICES/RANKINGS/RATINGS		SCALE	DATA
CDP	A (Leadership Score in Climate Change)	D- to A	2025
S&P Global ESG Score (CSA)	88 (Yearbook Member - Top 10%)	0 to 100	As of February 2025
Dow Jones Best-In-Class World Index	The only Brazilian telecommunications company in the index, delivering the 6th best sector performance in the world.		As of February 2025
Corporate Sustainability Index (ISE)	Constituent / 91,95 points	0 to 100	As of May 2025
MSCI	A	CCC to AAA	As of June 2024
FTSE	4.9	0 to 5	As of June 2025
Sustainalytics	15.5 (Low Risk)	0 to 40+   The lower the better	As of April 2025
Moody's ESG	ESG Score: 62 (Advanced)*	0 to 100	As of October 2021
ISS ESG Corporate Rating	ESG Rating: B- (Prime)	D- to A+	As of January 2025
ISS ESG Quality Score	Environment: 3 Social: 1 Governance: 3	1 to 10   The lower the better	E and S: January 2025 G: March 2025
Refinitiv Global Diversity & Inclusion Index	Successfully listed	-	2025
Teva Women in Leadership Index	Successfully listed	-	2025
Corporate Sustainability Index (ISE B3)	Successfully listed	-	2025
Carbon Efficient Index (ICO2 B3)	Successfully listed	-	2025
FTSE4Good Indexes	Successfully listed	-	2025



# 1. GOVERNANCE

## 1.1 BOARD ADDITIONAL INFORMATION

**Shareholder approval required for changes in bylaw:** Corporate law requires that amendments to the bylaws be approved by the Shareholders' Meeting (Article 122, item I, and Article 135). TBRA's Bylaws (Article 7) ratify this rule by providing that General Shareholders' Meetings will be held when required by applicable law. Therefore, all matters submitted to TBRA's Shareholders' Meeting are previously submitted by the Board of Directors.

**CEO succession plan:** Telefônica Brasil ensures the continuity of the Company's management, ensuring that the succession of its key leaders is carried out in an orderly manner. As part of this process, the Company follows a global successor mapping program called Management Review, which considers the assessment of profiles and career expectations, identification of potential, and mapping of successors for executive positions within the organization, including the CEO. This process is conducted annually, and the identified professionals are constantly monitored by the Company.

**Limitation to directors' liabilities:** Director liability: The Company's internal documents (Bylaw and Internal Regulations of the Board of Directors) do not establish any limitations on the liability of its directors. Telefônica Brasil's bylaw define the liabilities of the Board of Directors (Article 15). Brazilian corporate law contains express rules for holding directors and officers accountable – Article 158 of the Corporations Law)

**Criteria of Independence:** The Company reports, through its Reference Form (CVM), the members of its Board of Directors who are considered independent. The total number of independent directors is disclosed in Form 20-F, filed with the SEC. Currently, of the 12 (twelve) members of the Board of Directors, 10 (ten) are classified as independent, in accordance with the criteria established by CVM Resolution No. 80/2022. In addition to the items marked in the question, the full list of criteria adopted by the company according to CVM Resolution No. 80/2022: "Art. 6. The qualification of an independent director must consider their relationship with: I – the company, its controlling shareholder, and its directors; and II – controlled, affiliated, or jointly controlled companies. § 1. For the purposes of verifying the qualification of an independent director, the following are not considered independent directors: I – is a controlling shareholder of the company; II – has their voting rights at board meetings bound by a shareholders' agreement concerning matters related to the company; III – is a spouse, partner, or relative, in a direct or collateral line, up to the second degree of kinship of the controlling shareholder, of a director of the company, or of a director of the controlling shareholder; and IV – is or has been, in the last 3 (three) years, an employee or director of the company or its controlling shareholder. § 2. For the purposes of verifying the qualification of an independent director, the situations described below must be analyzed in accordance with In order to verify whether they imply a loss of independence of the independent director due to the characteristics, magnitude, and extent of the relationship: I – has a kinship relationship up to the second degree with a controlling shareholder, company director, or director of the controlling shareholder; II – is or has been, in the last 3 (three) years, an employee or director of affiliated, controlled, or jointly controlled companies; III – has commercial relationships, including the provision of services or supplies of inputs in general, with the company, its controlling shareholder, or affiliated, controlled, or jointly controlled companies; IV – holds a position with decision-making power in the conduct of the activities of a company or entity that has commercial relationships with the company or its controlling shareholder; V – receives other remuneration from the company, its controlling shareholder, affiliated, controlled, or jointly controlled companies other than that related to serving as a member of the board of directors or committees of the company, its controlling shareholder, or its affiliated, controlled, or jointly controlled companies, except for cash earnings arising from participation in the company's capital stock and benefits arising from supplementary pension plans; and VI – founded the company and has significant influence over it."

## 1.2 RISKS

**Regular risk management education for all non-executive directors:** In addition to the risk training provided to board members, the company also offers training on Responsible Business Principles, which covers all of the company's most relevant commitments and topics in comprehensive terms of ESG impacts, risks, and opportunities.

**Incorporation of risk criteria in the development of products and services:** The main impacts and risks linked to the company's products and services are managed through specific tools that allow the assessment and mitigation of their effects in the initial phases of development of these products and services, namely: Privacy-by-design (focused on data privacy criteria), Security-by-design (focused on digital security criteria) and Responsible Design (focused on ESG and sustainability criteria).

## 1.3 CONTRIBUTIONS

Indicators	Metric	2024
Lobbying, interest representation or similar	R\$	0
Local, regional or national political campaigns / organizations / candidates	R\$	0
Trade associations or tax-exempt groups	R\$	11'177'025.57
Other	R\$	0
Total	R\$	11'177'025.57

## 1.4 SUSTAINABILITY GOVERNANCE

Board Oversight (liked directly to Board of Directors)	Quality and Sustainability Committee
Executive Oversight (liked directly to Board of CEO)	Sustainability Committee
Executive responsibility	
VP of Communication and Sustainability (one-level of CEO)	Marina Daineze
Director of Sustainability (two-level of CEO)	Joanes Ribas

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## 1.5 SUPPLY CHAIN MANAGEMENT

**Overview (supplier ESG program):** In accordance with the Internal Regulations of The Board of Directors And its Technical and Consulting Committees Of Telefônica Brasil S.A., the board of directors is responsible for, among other duties: "(ii) periodically examine, analyze and monitor the Responsible Business Plan, as well as the Company's sustainability indexes, recommending eventual actions when opportunities are identified." (page 16). Sustainability in the value chain is one of the pillars of the Responsible Business Principles (Responsible Business Principles, page 14, topic: Responsible Management of The Supply Chain - <https://www.telefonica.com/en/wp-content/uploads/sites/5/2021/03/OurBusinessPrinciples.pdf>). Furthermore, Supply Chain Sustainability Policy Telefônica Group is approved by the Board of Directors of Telefônica S.A. Sustainable supply chain management is part of the Responsible Business Plan, monitored by the Sustainability and Quality Committee (Board of Directors committee), which oversees its implementation and the achievement of goals.

### Methodology for suppliers screening:

- Country-specific risk:** The IntegrityNext, our monitoring tool implemented to monitor high-risk suppliers in terms of sustainability, utilizes quantitative data from internationally recognized sources to evaluate the risk level associated with each risk area in each country. Leading institutions and well-known NGOs regularly publish indicators that assess a country's performance across various dimensions of sustainability, including environment, social, and governance. IntegrityNext uses 25 different indicators to evaluate 13 risk areas for each country.
- Sector-specific risk:** The IntegrityNext, our monitoring tool implemented to monitor high-risk suppliers in terms of sustainability, uses qualitative data from internationally recognized sources to assess the risk level associated with each risk area in each industry. Based on this qualitative data, IntegrityNext assigns risk ratings from 1-5 (very high risk, high risk, medium risk, low risk, very low risk) to industries using indicators. IntegrityNext uses a variety of environmental and social indicators to assess the industry risk of a supplier. A risk area may consist of different industry indicators.
- Commodity-specific risk:** All suppliers monitored by IntegrityNext must complete an assessment confirming that the products they manufacture, contract to manufacture, or sell do not contain minerals from conflict zones. Additionally, our Supply Chain Sustainability Policy includes a clause stating that the supplier must have a clear policy and processes in place to ensure compliance with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Furthermore, the Policy and procedures will be aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High-risk Areas. If requested by Telefônica, the Supplier must complete the Conflict Minerals Reporting Template from the Responsible Minerals Initiative or a similar questionnaire approved by Telefônica, aimed at enhancing transparency regarding the sourcing of such minerals in Telefônica's value chain.

**ESG benchmarks against peers:** Both the Plural Partner Program and the IntegrityNext tool provide peer comparison information for participating suppliers. In the Plural Partner Program, consolidated information is presented at supplier awareness and development events, while in IntegrityNext, reports contain contextual and sectoral information that allows for peer comparison.

**Technical support programs:** The Plural Partner Program offers several initiatives to provide technical support to suppliers, ranging from providing manuals and similar documents, informative emails, and workshops to promote their development on key ESG topics. Furthermore, for carbon-intensive suppliers, the company has a specific development program (Vivo Net Zero), which provides consulting services (paid by Telefônica Brasil) to support these suppliers at different stages of their compliance journey, such as preparing an inventory, defining action plans and goals, and more.

**Supplier on-site assessments (3rd party assessment):** Every year, independent third-party audits are conducted with selected suppliers who operate in the allocated labor services within the company's operations. These audits follow homogeneous sustainability criteria at the regional level aimed at verifying compliance with the minimum business criteria included in our Supply Chain Sustainability Policy (ethical aspects, labor obligations, health and safety at work, environment, and/or data security and protection), as well as their extension among their own suppliers. In 2024 and 2025, the third-party audits was conducted by Achilles South Europe S.L.U.

**Suppliers exclusion:** When overall management is assessed and a supplier scores poorly on social and environmental issues, said supplier can be considered unacceptable and classified as high risk. In this case, suppliers are preventively blocked on the procurement platform. This prevents new contracts from being made with them and bars them from taking part in bidding processes. In order to be unblocked, suppliers need to formally commit to creating an action plan to improve in the areas and indicators in which they underperformed.

Furthermore, the company has contractual clauses that determine that failure to comply with the minimum ESG criteria established in our policies will result in termination of the contract with the supplier.

### 3.4. Sustainability Conditions.

3.4.1. CONTRACTOR declares that it is aware of and in compliance with the following documents:

a. Comply with CONTRACTOR's Supply Chain Sustainability Policy, available at the website below, and incorporate the Sustainable Development Goals (SDGs) into its management, available at <http://www.estrategiaods.org.br/>;

Sustainability Policy Link: <https://www.telefonica.com.br/content/dam/others-sites/telefonica/telefonica-com-br/homepage/pdf/sustentabilidade/principais-politicas/politica-de-sustentabilidade-na-cadeia-de-fornecimento.pdf>

b. Adopt fair and ethical conduct, respecting the Responsible Business Principles available at the following website address, to which the CONTRACTED PARTY hereby declares knowledge and adherence: Telefônica Responsible Business Principles ([telefonica.com.br](https://www.telefonica.com.br))

c. Comply with the CONTRACTING PARTY's Human Rights Policy, available at the following website address, and incorporate practices to promote Human Rights into its management: <https://www.telefonica.com.br/content/dam/others-sites/telefonica/telefonica-com-br/homepage/pdf/sustentabilidade/principais-politicas/politica-global-direitos-humanos.pdf>

3.4.6. Failure to comply with any of the provisions of Clause 3.4 of this Agreement may result in termination of the agreement or, at the discretion of the CONTRACTING PARTY, the submission by the CONTRACTED PARTY of an action plan detailing corrective measures, to be approved by the CONTRACTING PARTY.

### KPIs for Supplier Assessment and/or Development

		2024
Total number of unique suppliers assessed	number	132
Total number of suppliers supported in corrective action plan implementation	number	39
Total number of suppliers in capacity building programs	number	24

## 1.6 CYBERSECURITY & PRIVACY

Rights provided to individuals regarding the control of their data		2024
Opt-in consent required	Text	Yes
Data update or correction	Text	Yes
Data access and consultation	Text	Yes
Suspension of contact permission (Opt-out option)	Text	Yes
Data deletion	Text	Yes

100% of users whose customer data is used for secondary purposes (improving the entity's products or service offerings).

Number of law enforcement requests for customer information		2024
Telephone and telematic interceptions	Number	270,516
Metadata	Number	4.465,502
Website Blocking	Number	31.655
Service Suspension	Number	14.941

*Note: 96% of requests are addressed in accordance with the guidelines and restrictions contained in current legislation and regulations. Unfulfilled requests are for a variety of reasons, such as requests for lines from other operators that the operator does not manage, technical impossibility, among others.*

Information Security Practices		2024
Board Member responsible by Digital Strategy Review	Text	Solange Sobral Targa
Access Control / Least Privilege Principle	Text	Yes
Encryption and de-identification techniques	Text	Yes
Vulnerability / Cyberattacks Tests	Text	Yes
ISO 27001 Certification	Text	Yes
Security-related business continuity plans		Yes
Security vulnerability analysis		Yes
Internal audits of the IT infrastructure/information security management systems		Yes
report incidents' process for employees		Yes
Information security training		Yes
Supplier security assessments	Text	Yes

## 1.7 IMPACT EVALUATION

In our most recent study, aligned with the business operations conducted throughout 2024, we estimated that our activities generated a positive impact of approximately R\$131.5 billion in Brazil. This result underscores the crucial role of connectivity and digital transformation in advancing both society and sustainable economic growth. It also reflects our commitment to driving sustainability within the telecommunications industry and demonstrates our contribution to the United Nations 2030 Agenda for Sustainable Development. Through the analysis of our externalities—integrated into the company’s dual materiality assessment—we gain deeper insight into our effects on society and the environment, which informs continuous improvements in product innovation and decision-making. In this way, the impacts we create for people and nature are embedded in our corporate strategy, business model, and governance. Our ultimate goal is to enhance the economic, human, social, and environmental value delivered to our investors, financiers, and all stakeholders with whom we engage.

The measurement and evaluation of impact—also known as impact valuation—is an evolving discipline aimed at quantifying and assessing how companies affect society. Our analysis is based on identifying the most significant externalities of our operations and assigning them a monetary value. This approach enables all impacts to be expressed in a consistent metric, facilitating comparison, prioritization, and management of results. To ensure robustness, we have adopted methodologies and guidelines from recognized institutions such as Harvard Business School, the Value Balancing Alliance, the World Business Council for Sustainable Development (WBCSD), and the Capitals Coalition. These institutions provide internationally recognized frameworks that support companies in reliably quantifying their societal and environmental impacts.

In total, we have analyzed and measured 25 distinct impact areas, whose results are summarized according to the four capitals defined by the Capitals Coalition. The aggregated outcomes reflect the comprehensive value we generate across natural, social, human, and financial dimensions.

Impact evaluation		2024
Human capital	R\$Billion	22,7
Financial capital	R\$Billion	99,9
Natural Capital	R\$Billion	0,7
Social capital (digital inclusion)	R\$Billion	8,2

*Disclaimer: The information above summarizes the results of Vivo's internal impact measurement study for 2024. The analysis applies established frameworks from the Value Balancing Alliance, WBCSD, Harvard Business School, and Capitals Coalition. While the overall results are disclosed, the detailed methodologies and calculations for each of the 25 impact areas remain internal. The monetized impact reflects an estimated value creation for society and the environment, not a financial or accounting measure.*



## 2. SOCIAL

### 2.1 HUMAN CAPITAL

Employees		2021	2022	2023	2024
eNPS (Employee satisfaction)	points	84	84	88	85
Covered aspects in the satisfaction employee survey					
Job satisfaction	Text	Yes	Yes	Yes	Yes
Purpose	Text	Yes	Yes	Yes	Yes
Happiness	Text	Yes	Yes	Yes	Yes
Stress	Text	Yes	Yes	Yes	Yes
Employees eligible to participate in the survey	Number	-	-	29,534	29,576
% of employees who responded to the survey	Percentage			93%	92%

Collective Agreement		2021	2022	2023	2024
Collective Agreement Negotiation - Frequency	Text	Annually	Annually	Annually	Annually
Strikes and lockouts	Text	No	No	No	No

#### Labor Practices Commitment and Programs

Vivo is committed to local legislation and best market practices. Its compensation process is based on internal studies that include market benchmarking, gender pay gap studies, and monitoring, among others. Furthermore, we are committed to Ambition 2030 in the Fair Wage initiative. We have principles that address work-life balance, as well as disconnection practices. The company has a limit of two additional hours of time banked and controls overtime, working hours, paid annual leave, among other aspects, carried out through physical and/or digital means that allow employees, managers, and the company to monitor this process and ensure proper management and payments to employees. Voluntary or involuntary dismissal programs are monitored and negotiated with the respective workers' associations and their collective agreements, whose communication deadlines are established through this process. The relationship with these associations is ongoing, and collective agreements are established annually that address salary increases, working conditions, benefits, and other issues. Vivo also offers training, qualifications, and structured workshops (internal and external) aligned with relevant topics on the future of work, including the development of soft and hard skills focused on digital transformation, innovation, artificial intelligence, sustainability, and more.

Policy or commitment aspects (include in external or internal policies, regulations or procedures)					2024
Paying a living wage					
Avoiding or reducing overtime or excessive working hours					Yes
Setting maximum working hours					Yes
Equal remuneration for men and women					Yes
Paying workers for annual leave					Yes
Minimum consultation or notice periods before mass terminations					Yes

		2021	2022	2023	2024
Training Hours Total	Number	3.400.659	2.902.843	2.094.238	2,154,572
Average hours of training and development	Number	86,1	72,5	51,2	57,7
Total amount invested in training	Monetary BRL	40,543,163.22	R\$ 44,196,905.69	RS 49.983.213,79	65,225,845.01
Average investment in training for employees	Monetary BRL	1'026.31	R\$ 1,103.93	R\$ 1.221,04	1,746.39

Data segregation levels for internal management					Status
Gender	Text				Yes
Age group	Text				Yes
Management level	Text				Yes
Race	Text				Yes
Type of training	Text				Yes

Training: Management Approach			2024
Degree programs or certifications for employees	Text		Yes
Leadership training	Text		Yes
Leadership training on bullying or harassment <sup>1</sup>	Text		Yes
Leadership training on Diversity <sup>2</sup>	Text		Yes

<sup>1</sup> The harassment course is mandatory for all Vivo's leadership.

<sup>2</sup> Senior and middle management participate in specific Diversity training to know in depth the company's diversity strategy and learn how to act effectively in their areas.

Employee Training *			2024
Support for degree programs or certifications	Text		Yes
Leadership training and skills development	Text		Yes
Process for identifying training needs	Text		Yes

\*Practices described are applicable to eligible (full-time and part-time) employees.

Type of Performance Appraisal			2024
Management by objectives			Yes

To support team management and guide individual and professional development plans, Vivo conducts an annual Performance Assessment. Applied to 100% of employees and managers, aligning organizational objectives with departmental challenges, the process bridges the gap between leaders and team members and fosters productivity, efficiency, and professional development.

Multidimensional performance appraisal (e.g. 360 degree feedback)			Yes
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We implemented the new evaluation model for the company's executive group, which includes multiple evaluators, as in the 360 format:

- Primary Evaluator: Employee's immediate manager; and
- Functional Evaluator: Individuals involved in projects, with direct interaction with the evaluated employee, such as peers, team members or customer areas.

Team-based performance appraisal			Yes
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Through the Success Factors Platform, it is possible to send and request continuous feedback to the immediate manager, team peers, or individuals who were in the same project. Additionally, throughout the year, we encouraged feedback among employees through the Eu+Vivo Program, where it is possible to send acknowledgments based on our cultural guidelines: MAKE IT HAPPEN WITH ACCOUNTABILITY, OPENNESS, DIGITAL ATTITUDE, and CURIOSITY.

Agile conversations			Yes
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With the implementation of the new Performance model for the company's executives, the check-in function is in effect, allowing for recurring feedback, enabling the closure of actions at the end of each project or delivery, with an indication of successes and areas for improvement. This functionality is available to multiple evaluators, not just the manager. In order to integrate the code of conduct as an attribute present in the performance evaluation since 2020, the highest concepts in the performance evaluation can only be attributed to employees who have completed the mandatory courses, including the course related to the Code of Conduct, called Principle Responsible Business as another mechanism that guarantees the effective implementation of our code of conduct. In our internal labor regulations list a series of duties on the part of employees that are subject to disciplinary measures based to our Code of Conduct that can culminate in even termination of contract. Besides it is stated that employees can be penalized (with suspension/warning) that as a result of the suspension and their remuneration is impacted due to the period they were out of the company.

Employee Benefits*			2024
Salary supplement in case of sick leave	Text		Yes

\*Detailed list of benefits available in the 2023 Integrated Report, pages 132 and 133. Link: <https://ri.telefonica.com.br/en/esg/sustainability-reports/>

Diversity			2024
Individuals by gender in C-level positions			2024
Men	Number		6
Women	Number		3
Total	Number		9

Compensation			2024
Variable Compensation linked to ESG KPIs (Emissions Reduction, NPS and Gender Diversity) - CEO	Text		Yes
Variable Compensation linked to ESG KPIs (Emissions Reduction, NPS and Gender Diversity) - C-Level	Text		
Variable Compensation linked to ESG KPIs (Emissions Reduction, NPS and Gender Diversity) - All Executives	Text		
Variable Compensation linked to ESG KPIs (Emissions Reduction, NPS and Gender Diversity) - All Employees	Text		Yes
Employee stock ownership plan <sup>1</sup>	Text		Yes

For short-term incentives, the profit-sharing program (PLR) is linked to strategic planning that takes into account financial and non-financial performance indicators, with 20% of the variable pay being linked to ESG indicators. Additionally, since 2022, we approved that 50% of the Long-Term Performance Plan be referenced in Vivo shares (VIVT3) with cash settlement, maintaining 50% in deliveries of Telefónica Group shares. The incentive is conditional on achievement of the goals established for the plan, which includes the indicators relating to Total Shareholder Return (TSR), Free Cash Flow, the neutralization and reduction of CO2 emissions and diversity.

**ESG Indicator (Compensation)****Achievement 2024**

Customer Experienc (NPS)	Text	Yes
Reduction of GHG emissions	Text	Yes
Diversity (Women in director positions)	Text	Partial

## Human Capital Return on Investment

		2021	2022	2023	2024
Total Gross operating revenue	Monetary Units	44'032'613'000	48'041'162'000	52'100'151'000	55'845'048'000
Total Operating Expenses	Monetary Units	21'465'307'000	22'560'582'000	24'580'681'000	24'508'293'000
Total employee-related expenses	Monetary Units	4'111'674'000	5'653'090'000	6'181'499'000	6'556'767'000
Resulting HC ROI (a - (b-c)) / c		6.48859	5.50737	5.45191	5.7793
Total Employees	Number	32'551	32,915	33.206	33'094

## Health & Safety - Certification Our occupational health and safety program is ISO 45001 certified, so we have an OHS management system that covers the following elements:

		2024
OHS risk and hazard assessments to identify what could cause harm in the workplace	Text	Yes
Prioritization and integration of action plans with quantified targets to address those risks	Text	Yes
Integration of actions to prepare for and respond to emergency situations	Text	Yes
Evaluation of progress in reducing/preventing health issues/risks against targets	Text	Yes
Internal inspections	Text	Yes
External health and safety audits	Text	Annually
Procedures to investigate work-related injuries, ill health, diseases and incidents	Text	Yes
OHS training provided to employees and/or other relevant parties to raise awareness and reduce operational health & safety ii	Text	Yes
OHS criteria introduced in procurement and contractual requirements	Text	Yes

## 2.2 CUSTOMER SATISFATION

		2021	2022	2023	2024
Year-on-year NPS (Net Promoter Score) evolution	Number	+2	+2	+2	+2
Customer satisfaction - mobile services (Anatel survey)	Number	7.56	7.49	7,76	7.74
% of revenues generated online	%				30
% of digital contacts with Vivo (App Vivo)	%				87

## 2.3 HUMAN RIGHTS AND ETHICS

### Human Rights: Management Approach

Telefonica Brazil (Vivo) carries out its activities with respect to human rights with all its stakeholders, in accordance with global human rights principles, such as the United Nations Global Compact (UNGC), ILO Declaration on Fundamental Principles and Rights at Work, among others. Its commitment to human rights is established in the Global Human Rights Policy, which covers all its own operations, suppliers and partners and deals with the general principles that will have minimum requirements and that define a framework for the Telefonica Group, which can be developed in more detail in each of the operators that are part of the group. In any case, in every group, commitments such as preventing human trafficking, forced labor, child labor, discrimination and respecting freedom of association, the right to collective bargaining, equal remuneration and respect for other rights such as privacy, security, freedom of expression, responsible use of products/ services, child protection, diversity, inclusion, health and safety, anti-corruption, are highlighted. environment, community rights.

### Human Rights Assessment and Mitigation

We define improvement and mitigation plans based on the results of the Human Rights risk matrix and based on the compliance analysis of ISO 26001, our main guideline for the Corporate Social Responsibility Management System, evaluated by a third party. As a result, we continuously update our main policies, processes, and management systems. This process covers 100% of our operations in Brazil. Given the constant actions taken to reduce the probability of a potential negative impact, in 2024, no cases of human rights violations occurred, so no remediation plan was necessary.

### Total operational sites where have been assessed human rights risks

		2024
Own Operations <sup>1</sup>	Percentage	100%
Contractors and Tier I Suppliers <sup>2</sup>	Percentage	100%
Joint Ventures <sup>3</sup>	Percentage	100%
<b>Total operational sites where risks have been identified</b>		
Own Operations	Percentage	2,51%
Contractors and Tier I Suppliers	Percentage	11,2%
Joint Ventures	Percentage	0%
<b>Operational sites where have human rights risks with mitigation actions taken</b>		
Own Operations	Percentage	100%
Contractors and Tier I Suppliers	Percentage	100%
Joint Ventures	Percentage	0%

<sup>1</sup> 100% of Telefonía's business (i.e.1.836 sites in 2024) is assessed through annual human rights risk assessments, as we consider all sites with installed people may have human rights risks and 100% of them have been developed action plans

<sup>2</sup> 100% of suppliers are analyzed for human rights in our internal risk analysis annually.

<sup>3</sup> In joint ventures, we conducted an assessment for 100% of active Joint Ventures and employees hired on the payroll. As mitigation actions, we systematically carry out the training on Responsible Business Principles that apply to our employees, business partners and suppliers and we provide the Responsible Business Channel for any manifestations or the need for complaints, where we will implement remediation actions when necessary. For joint ventures, we assume the possibility of risk in companies that have employees on their staff.

**Human Rights Mitigation & Remediation****2024**

Sites with mitigation plans	Number	1836
All high risk activities with mitigation plan and remediation process implemented <sup>1</sup>	Percentage	100%

<sup>1</sup> As mitigation plans are implemented, recommendations from impact assessments are implemented in relevant areas of the company, training is carried out for employees in human rights. In addition, through the reporting channels, reporting mechanisms are constantly reviewed and disclosed allowing employees and other affected parties to anonymously report and report any suspected human rights abuses, all reports are investigated and corrective measures are implemented when necessary to deal with reported violations. In the supply chain, if a deviation from Telefónica's Human Rights commitments is detected, the following measures are taken: Request for immediate clarification of the occurrence; - Communication on Telefónica's policies and position on its actions in relation to Human Rights; - Conducting an audit to verify compliance with the Minimum Criteria for Responsible Business established in the Telefónica Group's Supply Chain Sustainability Policy; - In the event of non-negotiation with the supplier and/or recurrence of the case, the contract may be repeated immediately.

**Ethics: Management Approach****2024**

Ethics and Anti-Corruption Certifications	Text	DSC 10.000
Ethics training - Responsible Business Principles (including whistleblower channel)		
Ethics and Anti-Corruption Audits	Text	Yes
Ethics and Anti-Corruption Audit frequency	Text	Anually

In our internal labor regulations list a series of duties on the part of employees that are subject to disciplinary measures based to our Code of Conduct that can culminate in even termination of contract. Besides it is stated that employees can be penalized (with suspension/warning) that as a result of the suspension and their remuneration is impacted due to the period they were out of the company.

In order to integrate the code of conduct as an attribute present in the performance evaluation since 2020, the highest concepts in the performance evaluation can only be attributed to employees who have completed the mandatory courses, including the course related to the Code of Conduct, called Principle Responsible Business as another mechanism that guarantees the effective implementation of our code of conduct.



### 3. ENVIRONMENTAL

Telefônica Brasil believes in the power of digitalization to offer people new opportunities and positively transform society. Our Environmental Policy is approved by the Board of Directors and has a triple purpose: to support risk management and environmental compliance; minimize the impact of our activity on the environment; and, finally, maximizing technology's ability to address the environmental challenges facing society. In addition to ensuring compliance with legislation and other environmental requirements, we are committed to continuously protecting the environment and reducing our environmental footprint, through the preservation of biodiversity and ecosystems, and not deforestation, as an axis for the improvement of our Natural Capital. We are also committed to promoting efficient water management by reducing our water footprint, in addition to maximizing the opportunities offered by the circular economy, promoting the eco-design of our products and services, minimizing the impact of our waste, promoting reuse and recycling and reducing the generation of hazardous waste.

These commitments also extend to our value chain. Any person, company or organization that wants to be considered a Telefônica Brasil supplier must undertake to comply with the Minimum Criteria for Responsible Business and at all times ensure that its subcontractors comply with this obligation. From an environmental point of view, among many other points, the suppliers should have a documented environmental policy, which includes a commitment to environmental protection, biodiversity, compliance with applicable laws and continuous improvement. All these guidelines translate into our Supply Chain Sustainability Policy. We also have an Energy Management Policy, approved by the Board of Directors, which guides the company in terms of energy efficiency and the pursuit of reducing emissions, contributing to our goal of becoming a net zero company by 2035.

The document containing Telefônica Brasil's Responsible Business Principles and the policies mentioned above can be found on our website: <https://www.telefonica.com.br/a-telefonica/vivosustentavel/principais-politicas>

In order to monitor our environmental performance and promote continuous improvement in our processes, we establish annual indicators related to the possible impacts of our operations, as well as targets related to them. To manage the possible environmental risks and impacts of our operation, we follow the guidelines of the Environmental Management System (EMS), certified under the international ISO 14.001 standard.

#### 3.1 ECO-EFFICIENCY

<b>Data Center Energy Usage</b>		<b>2022</b>	<b>2023</b>	<b>2024</b>
Total energy used in data centers	MWh	73898	68740	65861,000
Percentage of renewable energy	%	100	100	100

<b>Water Efficiency Management Programs</b>		<b>2024</b>
Targets to reduce water use		1% reduction by 2035 based on 2025 consumption

<b>End of Life Cycle E-waste</b>		<b>2022</b>	<b>2023</b>	<b>2024</b>
Total weight of WEEE collected from takeback programs	Tonnes	665.5	573.5	647,000
Percentage of takeback WEEE reused / resold / recycled	%	100	100	100
Percentage of takeback WEEE disposed / landfilled	%	0	0	0

<b>Sustainable Revenues</b>		<b>2022</b>	<b>2023</b>	<b>2024</b>
Sustainable revenues (Ecosmart label)	R\$	1'631'700'000	2'300'000'000	2'690'000'000
Percentage of sustainable revenues	%	3.39	4.41	4.81

The Ecosmart seal is a product or service with external certification for proven environmental benefits for: Climate change mitigation/Climate change adaptation, Sustainable use and protection of water resources, Transition to a circular economy and Pollution prevention and control. In addition to this separation of specific recipes for its certified product line, the company also has a separation according to the European taxonomy presented in item 1.2 of this document.

*Popular plans have a cost or margin of approximately -16.3% and -24.2%, lower than the average of other plans.*

#### 3.2 SUSTAINABILITY TAXONOMY (European approach)

<b>Taxonomy-Eligible</b>	<b>2024 (R\$)</b>	<b>2024 (%)</b>
Total figures (Revenue)	55'845'000	100
Total figures (Capital Expenditure)	13'965'000	100

Total figures (Operational Expenditure)	4'693'000	100
Total of which is Taxonomy-Eligible (Revenue)	1'842'885	3.3
Total of which is Taxonomy-Eligible (Capital Expenditure)	321'195	2.3
Total of which is Taxonomy-Eligible (Operational Expenditure)	112'632	2.4
Total of which is Taxonomy-Aligned (Revenue)	3'127'320	5.6
Total of which is Taxonomy-Aligned (Capital Expenditure)	2'262'330	16.2
Total of which is Taxonomy-Aligned (Operational Expenditure)	0	0
Total of which is not Taxonomy Eligible (Revenue)	54'002'115	96.7
Total of which is not Taxonomy Eligible (Capital Expenditure)	13'643'805	97.7
Total of which is not Taxonomy Eligible (Operational Expenditure)	4'580'368	97.6

The ICT sector is one of the six sectors listed in the taxonomy because of its contribution to climate mitigation and adaptation. The **main Taxonomy-eligible economic activities**: (a) Activities that can make a substantial contribution to climate change mitigation: Activity 8.1. Data processing, hosting and related activities and Activity 8.2. Data-driven solutions for GHG emissions reductions; (b) Activities that can make a substantial contribution to climate change adaptation: Activity 8.3. Programming and broadcasting activities. **Secondary activities**: Activity 5.5. Product as a Service (Equipment Rental at Customer's Site), Activity 6.5. Transport by motorbikes, passenger cars and light commercial vehicles, Activity 7.3. Installation, maintenance and repair of energy efficiency equipment, Activity 7.5. Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings and Activity 7.7. Acquisition and ownership of buildings.

## 3.3 CLIMATE AND BIODIVERSITY STRATEGY

### The path to decarbonization

In order to assess our impact and set mitigation strategies, since 2010 we monitor CO<sub>2</sub> emissions generated in our operations according to The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard, ISO 14064 and Brazil GHG Protocol Program. Since 2012, our GHG inventory is qualified in the gold category – the best rating in the Brazilian platform that confirms external assurance on the disclosed data.

On a monthly basis, we keep track of our Scope 1 and 2 greenhouse gas emissions from more than 36 thousand sites around Brazil. On a quarterly basis, emissions results are sent to the Board of Executive Officers to monitor compliance with the annual emission reduction target, which has an impact of 5% on all employee and executive bonus. Scope 3 emissions are calculated and reported annually, for which we also have short- and long-term reduction targets.

Telefônica Brasil aims to become a Net-zero Company by 2035. This means reducing scope 1, 2, and 3 emissions to a consistent residual level aligned with the 1.5°C scenario and neutralizing residual emissions. Our decarbonization journey considers short-term (2025), medium-term (2030), and long-term (2040) objectives, validated by the SBTi initiative at the Group level. By advancing our goal to become a Net-zero company in five years, we have set a medium to long-term target (2035). This target connects our medium and long-term objectives, which have been validated by science. In doing so, we seek to demonstrate our ongoing progress and our ability to adapt to changes in the technological, economic, and regulatory environment, ensuring that we are on the right path to achieve our long-term goals.

- Achieve net zero emissions by 2035, which considers:
  - Reduce Scope 1 and 2 emissions in 90% by 2030\*\* and at least maintain the 90% of reduction by 2035, compared to 2015.
  - Reduce Scope 3 emissions in 39% by 2025, 56% by 2030 and 90% by 2035, compared to 2016.
  - Neutralizing and offsetting residual emissions from Scopes 1 and 2 and starting from 2035, neutralizing residual emissions from Scopes 1, 2 and 3.
- Continue using electricity 100% generated from renewable sources, fostering the development with long-term power purchase agreements and self-generation.
- Reduce energy consumption per unit of traffic (MWh/ PB) by 95% by 2030, compared to 2015.
- Contribute to our customers avoiding CO<sub>2</sub> emissions through connectivity and Eco Smart solutions.

\*The targets validated by the SBTi are the objectives of Scopes 1, 2 and 3 up to 2030 and 2040, at the Telefônica Group level, including the emissions of Telefônica Brasil.

\*\*In 2023, we reached the target set for 2030, achieving a 90% reduction in our emissions, compared to 2015 and in 2024 the company maintained the level achieved

To guide the company in its commitment to reach zero net emissions by 2035, Telefônica Brasil developed a Climate Action Plan, explaining how we align our business model with the most ambitious scientific climate recommendations. The Plan is structured into three main models, aligned with the business and with the emission scopes: Operational, Value Chain, and Commercial Models. In addition, it includes cross-cutting pillars in the Economic and Governance Models, which guide and enable the Company's transition toward a low-carbon economy. The plan can be accessed on our Investor Relations website: [https://ri.telefonica.com.br/pt/esg/relatorios-de-sustentabilidade#tipo\\_46](https://ri.telefonica.com.br/pt/esg/relatorios-de-sustentabilidade#tipo_46)

Aware of our responsibility to promote movements against climate change, our CEO signed the following public commitments, initiatives of the Brazilian Business Council for Sustainable Development (CEBDS):

- Climate Neutrality ([https://cebds.org/wp-content/uploads/2023/06/CARTA\\_NEUTRALIDADE\\_ING\\_2022.pdf](https://cebds.org/wp-content/uploads/2023/06/CARTA_NEUTRALIDADE_ING_2022.pdf))
- Business Leaders for The Climate ([https://cebds.org/wp-content/uploads/2023/06/CARTA\\_Empresarios-Clima\\_ING-3.pdf](https://cebds.org/wp-content/uploads/2023/06/CARTA_Empresarios-Clima_ING-3.pdf))
- Position of the Brazilian Business Sector on the Urgency of Creating a Regulated Carbon Market in Brazil ([https://cebds.org/wp-content/uploads/2024/06/CEBDS\\_2024\\_Mercado\\_Carbono.pdf](https://cebds.org/wp-content/uploads/2024/06/CEBDS_2024_Mercado_Carbono.pdf))
- Brazilian Business Commitment to Biodiversity. This letter specifically was sign by our Vice President of Institutional Relations and Sustainability (<https://cebds.org/ibnbio/o-compromisso/>)

These letters bring the importance of effective action to combat climate change, also highlighting the importance of protecting Brazilian forests (avoiding deforestation) and biodiversity.

We also are signatories of the Global Compact since 2010, and our actions are in line with the UN Sustainable Development Goal 13 (take urgent action to combat climate change and its impacts) and 15 (protect, restore, and promote sustainable use of terrestrial ecosystems). In 2023, Telefônica Brasil signed six commitments with the 2030 Ambition

## Biodiversity Impact Assessment and Commitments

As mentioned in Section 3 of this document on our Environmental Policy and Supply Chain Sustainability Policy, we are committed to protecting biodiversity and ecosystems, leveraging digitalization to prevent biodiversity loss, and sharing these commitments with our value chain.

### Biodiversity Impact Assessment

As mentioned in Section 3 of this document on our Environmental Policy and Supply Chain Sustainability Policy, we are committed to protecting biodiversity and ecosystems, leveraging digitalization to prevent biodiversity loss, and sharing these commitments with our value chain.

In 2019, Telefónica Brasil conducted its first biodiversity impact assessment. This analysis focused on quantifying the company's impacts on high-quality ecosystems and protected species in the different areas where we operate. The analysis used methodologies from the Natural Capital Protocol and the Biological Diversity Protocol and considered information from the IUCN Red List of Threatened Species. A specific location-based approach (using GIS) was used to measure and quantify the risk and impacts on biodiversity from our facilities in Brazil. The results of this first assessment show that most of our facilities are located in areas with "low" or "very low" biodiversity value.

In 2023, we conducted a new study using map analysis with the methodology of overlaying conservation unit layers, biomes, water resources, and Google hybrid base. This allowed us to observe the number of structures and their location. The analysis was again conducted using the QGIS tool, with conservation unit information obtained from the official website of the Ministry of the Environment and water resources layers from the National Water Agency database. The results showed that the main biodiversity impact lies within our value chain, where 5% of the Base Radio Stations (ERBs) managed by third parties are within conservation units (97% of which are for sustainable use). According to the studies, the main direct impacts (own operations) of Telefónica Brasil on biodiversity are of low significance, as only 0.27% of the total park consists of its own ERBs in conservation units.

In addition to this study, in 2024, the Telefónica Group conducted an analysis of dependency, impacts, risks, and opportunities related to nature, covering all countries where it operates (including Telefónica Brasil). The results of this biodiversity assessment showed that the main impacts of Telefónica occur in its value chain, reinforcing the results obtained from Telefónica Brasil's assessment.

- Upstream: The impacts are related to land use change, water consumption, climate change, and inconveniences in various biodiversity components.
- Direct operations: The main pressures are climate change and land use changes due to energy consumption by telecommunications networks and land occupation (construction of base stations and cable laying).
- Downstream: The most relevant pressures are associated with environmental pollution.

The evaluations noted that the downstream value chain impact is low but present. This part of the chain includes the decommissioning of structures and equipment, waste management, logistics, and our customers.

### Scope of Studies

The scope of the studies included the assessment of impact on the value chain (upstream and downstream) and the company's direct operations.

### Identified Risks

The main identified risks were:

- Fire risk due to atmospheric discharges and/or equipment failure
- Radiofrequency emission from transmission antennas
- Soil and water pollution due to waste generation during the installation, operation, and maintenance of structures
- Interaction between fauna and own and third-party employees

These efforts have been the basis for understanding our biodiversity-related risks and opportunities and improving the company's decision-making to increase organizational resilience, following the main reporting frameworks and initiatives like TNFD.

More information can be found at <https://www.telefonica.com/es/wo-content/uploads/sites/4/2024/06/evaluacion-dependencias-impactos-riesgos-opportunidades-relacionados-naturaleza.pdf> and <https://www.telefonica.com/es/sostenibilidad-innovacion/medioambiente/responsabilidad-con-el-medioambiente/Commitments>

Since 2022, Telefónica Brasil has been a signatory to the Brazilian Business Commitment for Biodiversity of the Brazilian Business Council for Sustainable Development (CEBDS), reinforcing our commitment to protect Brazilian forests and biodiversity and prevent deforestation.

### Specific Objectives and Actions

1. Commitment 1: Integrate biodiversity into the company's business strategy ("Biodiversity as a Responsible Business Principle"), including defining a biodiversity-related target (KPI).
2. Commitment 2: Apply the mitigation hierarchy to prevent, mitigate, restore, and compensate for biodiversity impacts throughout project life cycles ("Mitigation hierarchy in network implementation, operation, and maintenance activities").
3. Commitment 8: Enhance conservation and restoration actions in regions where the company operates, aiming for a positive net impact on biodiversity ("Everything is connected: trees, climate, and biodiversity").

Biodiversity Commitment: Achievement of a net positive impact (NPI) on biodiversity (target: 2050)

No Deforestation Commitment: Compensate with future reforestation (target: 2030)

As part of the Telefónica Group's 1t.org initiative, we aim to conserve and restore 15 million trees between 2020 and 2030, improving biodiversity:

- Conserving 400,000 trees: In the short-medium term (2020-2025), the group is committed to supporting projects to prevent deforestation, investing in forest protection projects, and promoting the sustainable development of local communities.
- Restoring and planting 1,100,000 trees: Investing in reforestation and afforestation projects that sequester the same amount of carbon emissions as our Scope 1 and 2 emissions. Projects must meet a set of criteria aligned with the company's due diligence process. . Since 2019, Telefónica Brasil has already helped to preserve more than 481,000 trees in 805 hectares of the Amazon Rainforest.

## Connectivity and Sustainable Development

Connectivity is a major driver for social transformation and sustainable development in the country, helping to minimize environmental impacts of other economic sectors and facilitating access to essential services like education and health. Telefônica Brasil aims to bring digitalization nationwide, opening up new business opportunities and access to knowledge for our clients, business partners, and the entire value chain. This promotes economic and technological development across the country.

While the telecommunications sector's activities do not significantly impact natural biomes, it is sometimes necessary to remove vegetation to implement structures like base radio stations (ERBs) essential for providing connectivity in remote locations. We are committed to restoring at least the same amount of hectares possibly suppressed during the implementation of ERBs in strictly protected areas by 2030, whether the structures are owned or managed by third parties (suppliers).

## Governance and Biodiversity Protection

In 2024, Telefônica Brasil updated its "Environmental Policy," which outlines the commitment to biodiversity protection. Key commitments include:

- Integrating biodiversity protection into the company's Risk Map to support decision-making and the analysis, management, and reporting of short, medium, and long-term risks.
- Identifying and quantifying the environmental dependencies and impacts of the company's business model, covering biological diversity and ecosystem protection to minimize operational impacts on biodiversity.
- Applying the mitigation hierarchy principle (avoid, minimize, restore, and compensate) at all stages from planning to network deployment, operation, and decommissioning.
- Avoiding deforestation associated with its activities and/or upstream and downstream supply chains.
- Avoiding selecting new infrastructure project locations in protected areas due to their ecological, biological, cultural, and landscape value, except in cases of extreme necessity with no viable alternatives.
- Engaging stakeholders in the commitment to biodiversity protection.

In 2024, Telefônica Brasil committed to starting public disclosures aligned with TNFD recommendations in its corporate reports, joining the "TNFD Adopters" list as one of the world's first companies to make this commitment.

More information can be found at: <https://cebds.org/ibnbio/empresa/vivo/>; <https://www.1t.org/pledges/everythingisconnected-trees-climate-and-biodiversity>; [https://tnfd.global/engage/tnfd-adopters-list/?\\_sf\\_s=telefonica%20brasil](https://tnfd.global/engage/tnfd-adopters-list/?_sf_s=telefonica%20brasil); <https://www.telefonica.com.br/content/dam/others-sites/telefonica/telefonica-com-br/homepage/pdf/sustentabilidade/principais-politicas/politica-ambiental.pdf>.

## What we are already doing

Since early 2023, biodiversity risks related to Telefônica Brasil's operations have been incorporated into the company's corporate risk map. These risks are reassessed and recalculated semiannually, serving as the primary input for strategic decision-making.

In operations, we have procedures and work instructions guiding our objective to avoid environmental damage and liabilities. We comply with environmental legislation in the areas where we operate to ensure biodiversity protection. Using the "Environmental Aspects and Impacts Management - GAIA" tool, we identify all activities interacting with the environment that could potentially harm fauna and flora during site construction or implementation phases. Our operational controls follow the mitigation hierarchy: avoid, minimize, restore, and finally compensate for potential biodiversity impacts.

When planning ERB installations, even if not owned but built by sharing companies (tower lessors), we prioritize locations where intervention in protected natural areas is unnecessary. We also have a work instruction for road opening and maintenance, establishing appropriate environmental control guidelines for initial construction activities. In 2024, we conducted a Socio-Environmental Workshop for Infrastructure and Tower Management Companies to promote integration and engagement on socio-environmental issues, ensuring compliance with the company's sustainability objectives. Various partners attended the workshop, learning about Telefônica Brasil's new program, Vivo Bio, aimed at engaging sharing companies in biodiversity protection through voluntary tree planting to compensate for impacts through reforestation in Brazil.

More information about the biodiversity impact assessment and ongoing actions by Telefônica Brasil can be found in our Climate Action Plan, available on the company's website.

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## TCFD (Task Force on Climate-Related Financial Disclosures)

Since 2020, Telefônica Brasil annually reports in detail its climate action and performance in the CDP (Carbon Disclosure Project) Climate Change Questionnaire. For more details on each of the dimensions, please consult our responses to the most up-to-date questionnaire by accessing CDP's global reporting page (<https://api.mziq.com/mzfilemanager/v2/d/24165f81-24d6-4648-bf9f-66712905d5a2/98f8cd85-3d0b-b8e9-62e1-170b71fc8a50?origin=1>).

## GOVERNANCE (CDP questions - 4.1.2; 4.3)

- Describe the board's oversight of climate related risks and opportunities.
- Describe management's role in assessing and managing climate-related risks and opportunities.

## STRATEGY (CDP questions - 2.1; 3.1; 3.1.1; 3.6; 5.1; 5.1.1; 5.1.2; 5.2; 5.3.1; 5.3.2)

- Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term.
- Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning.
- Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.

## RISK MANAGEMENT (CDP questions - C2.1; C2.2; C2.2a)

- Describe the organization's processes for identifying and assessing climate-related risks.
- Describe the organization's processes for managing climate-related risks.
- Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.

## METRICS AND TARGETS (CDP questions - 7.6; 7.7; 7.8; 7.52; 7.53; 7.53.1; 7.54; 7.54.1; 7.54.2.)

- Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process.
- Disclose Scope 1, Scope 2, and if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.
- Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.

Advocacy - Actions to address misalignments with climate objectives

*"Our way of working reflects the type of Company we want to be and how we want everyone who interacts with us to see us."*

We emphasize that our commitment to the environment and climate action is expressed in the Company's Code of Ethics and Conduct, referred to as Responsible Business Principles. These principles reflect the type of company we want to be and the relationships we create with our stakeholders. Any known non-compliance is assessed and subject to sanctions.

Based on this assumption, through the internal Working Group, the organization analyzes and discusses actions with associations, political decision-makers, consultations on public policies, or other fronts related to climate advocacy, assessing their position in relation to the principles of action defined by the Company and the Paris Agreement. This Working Group's role is to monitor, analyze, and identify eventual cases of misalignment with existing policies or those under discussion to evaluate them with the applicable bodies in the Company and define the next steps, on a case-by-case basis.

In the event of misalignments involving public policies, the Company first indicates its position through public consultation and dialogue. If the misalignment position continues, actions are assessed, ranging from engagement agendas with these political decision-makers to formal positions, which may include studies and analyses, either directly or through associations. In the event of misalignment involving associations, actions to debate and engage on the issue with other participants and associates are initially planned. If the position of misalignment is maintained by this organization, other actions can be discussed, ranging from formalizing dissent, and non-participation of Telefónica Brasil in the discussions until termination of the membership association.