



Contents

1. Introduction	2
2. Purpose	2
3. Scope	2
4. Definitions	2
5. General Guidelines	5
5.1. Requirements, Prohibitions and Conditions	5
A. Requirements	5
B. Prohibitions to Sponsor	6
C. Special Cases	6
D. Related Benefits	6
5.2. Procedure to grant Sponsorship	7
5.3. Control of Entities in receipt of Sponsorship	10
6. Policy Compliance Oversight and Verification	10
7. Training and Release	11
8. Cooperation and Coordination	11
9. Sanctions	11
10. Whistleblower Portal	12
11. Questions and Comments	12
Appendix A – Sponsorship Request Format	13
Appendix B – Required Documentation of the Entity requesting Sponsorship	16
Appendix C – Due Diligence Report Format	17
Appendix D – Due Diligence Information Sources	19
Appendix E – Corruption Red Flags	20
Appendix F – Compliance Officer Recommendation Format	21
Appendix G – Goods Out for Sponsorship Format	23
Appendix H. Certification of Compliance with Anti-corruption Laws	24

Sponsorship Policy

América Móvil



1. Introduction

América Móvil, S.A.B. de C.V., its Subsidiaries and affiliates (hereinafter, “América Móvil” or “the Company”) confirms and officializes its commitment with the values and principles of entrepreneurial ethics and with the effective control of Corruption and illegality through this Sponsorship Policy (hereinafter, “the Policy”).

América Móvil has developed an Integrity and Compliance Program, which includes among others, a Code of Ethics, several internal Policies, as well as this Policy, to prevent and fight Corruption.

Any breach of our Code of Ethics, our internal policies or applicable anti-corruption laws, rules and regulations, even if the respective action or operation happens outside of Mexico, may lead to civil and criminal penalties ranging from fines to imprisonment being imposed on individuals and the Company.

2. Purpose

The purpose of this Policy is to set the principles, guidelines and procedures for the control of Sponsorships provided by América Móvil, to ensure that they are granted with the sole goal of promoting brand identity and they can represent the values and principles of the Company.

3. Scope

This Policy is applicable and mandatory for you and for any and all Employees and Third Parties whose duties and responsibilities include the selection, agreement, delivery and recording of Sponsorships. This Policy is also applicable to Employees and Third Parties that Benefit in some way from the Events sponsored by the Company.

4. Definitions

Friend(s): Any person, other than family, with whom the Employee has a personal relation or some kind of affinity, including close friendships and personal business contacts.

Beneficiary: Artificial person receiving and benefiting from the Sponsorship.

Benefit(s): The consideration received by the Company for Sponsoring Events, including without limitation brand mentions and presence in the media such as press, television, radio, screens, billboards, promotional items, or free or discounted access to the sponsored Events.

Sponsorship Policy

América Móvil



América Móvil's Code of Ethics: An institutional document that establishes the principles of conduct and values of América Móvil; it is applicable to all Employees and Third Parties, as well as any other person related to the companies of América Móvil.

Ethics Committee of Subsidiary: An organized body comprised of senior management members of each Subsidiary, entrusted with managing complaints received through the Portal and sent to the relevant Subsidiary, and with overseeing the implementation of and compliance with the Code of Ethics and any internal policies derived therefrom. This Committee is also tasked with deciding the activities to be carried out in the event of failures by Employees or Third Parties to comply with the Code of Ethics and company policies.

Conflict of Interest: This is a form of Corruption that consists of an action that may be unduly influenced by some personal, family or third party interest. A conflict of interest arises when the decisions or actions of an Employee or a Third Party are based on the Employee's or Third Party's own benefit (often of an economic or personal nature) as opposed to the responsibility of promoting the Company's best interests when acting on behalf of the Company.

Contract: Agreement between two or more persons to create, transfer, modify or terminate rights and obligations.

Corruption: In the public sector, this means any abuse of power for the benefit of the Company or ourselves, and arises in interactions with Civil Servants or Government Entities. It is known as Public Corruption. In the private sector, this means actions or failures to act with the purpose of getting some kind of unduly benefit for the Company, personal benefits or advantages to a Supplier and is known as Private Corruption.

Due Diligence: This means a background check of an individual or entity in order to identify potential legal, financial, Corruption, money laundering or reputational risks affecting the Company's reputation.

Employee(s): Any person or persons hired under an individual or collective bargaining agreement by América Móvil or any of its Subsidiaries.

Event: This means presentations, sporting, musical or cultural corporate occasions, etc., such as conventions, tournaments, fairs, theater plays or concerts, among others.

Relative(s): Blood relatives up to the third degree. This means that sons, daughters, spouses, parents, grandparents, uncles, aunts, nieces, nephews and cousins shall be deemed close Relatives.

Government: All the people and bodies institutionally entrusted with the exercise of political power to head, control, and manage a political-administrative division. This includes decentralized bodies and state-controlled companies.

Sponsorship Policy

América Móvil



Stakeholders: Groups of people, organized around a common interest, that receive the Sponsorship Benefits. There are internal Stakeholders such as shareholders, Employees, officers, etc., and external Stakeholders such as customers, suppliers, the media, etc.

Compliance Officer: This is the department of América Móvil responsible for establishing an Integrity and Compliance Program with appropriate and efficient policies and control, surveillance and audit systems, and in charge of constantly monitoring compliance with integrity standards across the organization. yocumplo@americamovil.com

Sponsorship: Economic support (Monetary Sponsorship) or support in kind (In-kind Sponsorship) for an Event in exchange for a commercial Benefit for the Company in order to promote the brands and/or as advertising or commercial strategy under Contract.

Politically Exposed Person or PEP: These are individuals who hold or used to hold prominent public office, such as heads of state or government, high level politicians, high level government, judicial officials or military officers, high level executives of state-owned corporations, officials of important political parties. The definition includes decentralized bodies, state-controlled entities, public trusts, autonomous bodies, and political parties.

Whistleblower Portal: The internal platform provided by América Móvil for Employees or Third Parties to report anonymously and confidentially any conduct that infringes upon the Company's Code of Ethics and/or policies <https://denuncias.americamovil.com>

Integrity and Compliance Program: This program was developed and is overseen by the Compliance Officer, and includes, without limitation: (i) preparing Company policies and other guidelines to comply with laws, rules and regulations in effect; (ii) the identification, prevention and mitigation of operational and legal risks in order to ensure the long-term reputational value of the Company and create more certainty across its value chain; (iii) the implementation of appropriate and efficient control, monitoring and audit systems allowing the ongoing and periodic verification of compliance with integrity standards throughout the organization; and (iv) managing operations of the Whistleblower Portal and coordinate training in compliance matters.

Red flags: Every sign that poses a risk of Corruption, fraud, Bribery, money laundering or any unethical practice in virtue of the law on applicable matters of anti-corruption.

Civil Servant (domestic/foreign): This is a person who holds a government position or is an Employee in a Government Entity or any other decentralized government office, either by election or appointment, at any level of Government, federal, national, state or municipal, including, without limitation, congress, ministries, judicial bodies, research agencies and organizations.

Sponsorship Policy

América Móvil



It also includes members of political parties or candidates to any position of election. Officials of public international organizations are also deemed Civil Servants (World Bank, United Nations, International Monetary Fund).

Bribery: This is a form of Corruption that consists of offering, promising or granting, as well as demanding or accepting any benefit, either in cash or in kind, directly or indirectly to other person, to get that person to do or refrain from doing something to ensure an undue advantage, or to secure, lead or retain business for a specific Company.

Subsidiary: Any entity controlled by América Móvil.

Third Party (Parties): Distributors, representatives, advisors, commercial partners, agents, brokers, customers, contractors, managers, lobbyists, consultants or suppliers who are part of the value chain of América Móvil or represent the Company in interactions with another Third Party, a Government or Civil Servants. This includes civil society organizations and education, charitable, cultural or sports institutions the Company is considering for a Donation.

5. General Guidelines

5.1. Requirements, Prohibitions and Conditions

This section contains guidelines for the authorization of any Sponsorship, either Monetary or in Kind.

A. Requirements

In all cases, Sponsorships:

- Will be for Events that share the social responsibility vision, values, and philosophy of the Company.
- Will be budgeted for by the Marketing Department of AMX and approved by the CEO in terms of budget.
- Will have a Contract duly signed and authorized by the Legal Department.
- Will have a fiscal receipt that meets all requirements to be deductible in accordance with applicable laws.
- Will be duly posted in the accounts, books and other accounting records of the Company, according to their nature, periods, and amounts spent, to follow appropriate accounting and tax procedures.



It is possible to grant Monetary Sponsorship; however, **under no circumstances will they be in cash**: a nominative check or wire transfer will be made to the entity receiving the Sponsorship.

B. Prohibitions to Sponsor

It is forbidden to offer Sponsorship to:

- Individuals, other than:
 - Investigators
 - Athletes
 - Artists
 - *Gamers*
 - *Influencers*
- Civil Servants, Political Parties and/or their candidates.
- Institutions owned by or related to Civil Servants.
- Institutions with disparate interests or that do not practice ethical values similar to those of the Company.
- Institutions that may represent a Corruption risk or affect the Company's reputation.
- Unions

C. Special Cases

Sponsorships of Events organized by Government Entities must be limited to the Benefit only, and in no way subject to conditions such as:

- The provision of government services within the range of responsibilities of the Entity organizing the Event;
- The award of a tender or public bid;
- The delivery of some additional good or service;
- A release of legal obligations of the Company.

In the event of Sponsorships for Governmental entities, Marketing will keep a record of all meetings (including the names of all attendants) involving interactions with the Civil Servants, as well as a copy of all written communications related to the negotiation and notes or minutes of the discussions at every meeting.

D. Related Benefits

The Benefits related to brand promotion received by the Company as part of the Sponsorship, such as access to Events, will be managed by Marketing as follows:



- The delivery of Related Benefits to Third Parties will be determined based on objective criteria in connection with sales, renovations, volume, permanence, etc.
- The delivery of Related Benefits to Stakeholders will be reviewed by the CEO, who will determine who will receive them and in what quantities.
- The delivery of Related Benefits to Employee will be based on the terms and conditions established by Marketing, along with Human Resources.
- In no event will related Benefits be delivered:
 - To Civil Servants.
 - By direct allocation to Employees in charge of managing access to Events.
 - To people or Entities that do not comply with the aforementioned criteria, or who are Friends or Relatives
- The delivery of all Benefits (Third Parties, Stakeholders or Employees) must be reported in writing to the CEO and informed to the Compliance Officer.
- If the CEO so determines, the delivery of related Benefits will require prior approval of the CEO.
- Complimentary tickets must be accompanied by an invitation letter addressed to a specific individual or to the company name of the Third Party receiving the Benefit, and will include a description of the Benefit, including quantity and type.

Reselling or trading these tickets is forbidden. Any action contrary to this provision must be informed to the Compliance Officer, or reported to the Portal on the Internet: <https://denuncias.americamovil.com>

The Compliance Officer will approve in writing any exception to this Policy.

5.2. Procedure to grant the Sponsorships

- i. The requesting area will submit to Marketing the “Sponsorship Request Format” duly filled in and signed, attached hereto as Appendix A. The request should be submitted together with:
 - The offer;
 - The Sponsorship business case; and
 - All information specified in the document “Required Documentation of the Entity requesting the Sponsorship”, attached as Appendix B of this Policy.
- ii. Marketing will complete an analysis of the Sponsorship request. For such purpose, the following elements shall be taken into account:
 - If the request is aligned with the criteria and exposure and trading objectives of the brands;



- The profile of the people attending the Event;
 - The social impact;
 - The strategic Benefits for brand positioning;
 - The possible Red Flags of the Sponsorship as set forth in Appendix E hereof; and
 - Direct and indirect costs of the Sponsorship.
- iii. If Marketing determines that the Sponsorship is convenient, it will send the necessary information and documentation listed in Appendix B hereof to the Chief Financial Officer for its validation.
- iv. Upon validation of the information by the Chief Financial Officer, it will ask the Compliance Officer to conduct a Due Diligence of the entity requesting the Sponsorship, according to the methodology specified in the “Due Diligence Report Format” attached hereto as Appendix C, as well as in Appendix D “Due Diligence Information Sources”.

Due Diligence should include at least the investigation of the following elements:

- Key officials of the requesting entity;
- Of the members of its board of directors;
- Of the legal representative;
- PEP identification, using the information sources listed in Appendix D hereof;

Furthermore, it should be verified that:

- There is no Conflict of Interest between the Employees, the Company and the entity that will receive the Sponsorship;
- There is no undue benefit for any Third Party or Civil Servant either directly or indirectly; and
- The Sponsorship delivery does not represent a type of Bribery or Corruption according to applicable anti-corruption law.

The result of the investigation will be recorded in the “Due Diligence Report Format” attached hereto as Appendix C.

If, as a result of the Due Diligence, any Corruption Red Flag is detected, the Compliance Officer will determine, based on the risk rating, if the authorization process for the Sponsorship can go ahead even with the red flags.

If applicable, the Compliance Officer will issue its approval using the “Compliance Officer Recommendations Format” attached hereto as Appendix F.

In order to update and monitor possible Corruption red flags prompted by the requesting entities, the Anti-Corruption Due Diligence report will be valid for two (2) years following the material delivery of the Sponsorship.



After those two years, the Sponsorship beneficiary must undergo again the Due Diligence procedure or, if deemed necessary, any area can be subject, at any time, to a new Due Diligence.

If a Sponsorship is requested upon termination of the Agreement for an authorized entity, the requesting department must ask the Compliance Officer if a Due Diligence report is necessary, and the Compliance Officer will specify which information and data must be requested again to the requesting entity.

At the end of each year, the Compliance Officer will submit to the CEO and to Marketing a final report of all Sponsorships granted.

- v. The Compliance Officer must issue its recommendations in response to the analysis referred to in the preceding section using the “Compliance Officer Recommendations Format” attached hereto as Appendix F.
- vi. If the Compliance Officer issues a favorable recommendation and the Chief Financial Officer validates the result, the requesting area will be able to send the request to the Marketing Director for its final authorization. Otherwise, the sponsorship request should be rejected, and notice of such rejection given to the corresponding entity.
- vii. If the amount requested for Sponsorship is equal to or greater than one hundred thousand U.S. Dollars (US\$100,000.00), legal currency of the United States of America, or its equivalent in local currency, authorization of the CEO will also be necessary.
- viii. Once authorized by the Marketing Director and/or the CEO, as the case may be, the corresponding purchase requisition will be created in the SAP system, and Legal will be asked to prepare the corresponding Contract.
- ix. The Beneficiary, upon reception of the Sponsorship, will submit the “Certification of Compliance with Anti-Corruption Laws” format attached hereto as Appendix H, duly filled in and containing its agreement to refrain from transferring the funds or goods received by the Company to any third party, and to use the Sponsorship exclusively for the purposes authorized by the Company.
- x. The Chief Financial Officer will be responsible for verifying that the receipt submitted by the Beneficiary is valid for tax purposes.
- xi. Once the Sponsorship (either Monetary or in Kind) is delivered, the corresponding accounting record must be completed in the SAP system, with enough detail for identification purposes.



- xii. Marketing will prepare a report reflecting how resources or goods delivered as Sponsorship were used, including evidence (documents, photos, videos, etc.) of that use of resources or goods.

5.3. Control of Entities in receipt of Sponsorship

The Compliance Officer will create and maintain a database of entities that have been authorized to receive Sponsorship from the Company, and of those that have been rejected.

The Compliance Officer must keep files of every Beneficiary, at least with the following information:

- Corporate information collected when assessing the request (Appendix B).
- Sponsorship Request Format, duly filled out, and if applicable, authorized.
- Sponsorship Due Diligence Report Format.
- Compliance Officer Recommendations Format.

If the Sponsorship was authorized, in addition to the above:

- Sponsorship Agreement.
- Certification of compliance with anti-corruption law format.
- Copy of the wire transfer made, or the payment check, as well as of the account statement that reflects the payment.
- Report of use of the resources or goods granted as Sponsorship.

6. Policy Compliance Oversight and Verification

The Compliance and Internal Auditing Officers are responsible for supervising, overseeing and, as applicable, auditing the due compliance of all provisions in this Policy, and periodically assessing their efficacy.

The Compliance Officer is also responsible for evaluating periodically the Integrity and Compliance Program which includes, among other things, a series of measures intended to prevent acts of Corruption. It is also responsible for providing guidance to Employees regarding this Policy, via this email address yocumplo@americamovil.com, along with line managers.

If any audits are necessary, they will be conducted regularly and randomly in the various departments of the Company.

All Company Employees must support and cooperate with the work teams in charge of such audits, refraining from obstructing or blocking audit processes and from providing incorrect or false information.



Remember that it is everyone's obligation to comply and make comply with the present Policy and report any act that is against it through the Portal of Complaints <https://denuncias.americamovil.com>.

7. Training and Dissemination

It is extremely important for us to understand and implement all actions described herein, and with the purpose of promoting a culture of transparency, ethics and values, América Móvil offers its Employees and Third Parties online or in-person courses, which will be promoted through the Company's official means of communication, in order to provide training to help them understand the concepts, scope, and situations that may occur during daily operations, and to express any concerns they may have.

We at América Móvil or its Subsidiaries are responsible for attending the allocated sessions, complying with the specified times and requested assessments.

8. Cooperation and Coordination

The Compliance Officer is responsible for preparing and making its best efforts to harmonize this Policy with respect to the Subsidiaries. However, the Subsidiaries will be responsible for complying with applicable legal obligations before the Authorities of each individual country.

Accordingly, Subsidiaries must have an internal procedure to ensure legal compliance adapted to specific anti-corruption, Sponsorship and anti-bribery obligations in each country.

Furthermore, Subsidiaries shall ensure that they have in place efficient mechanisms that may allow them to cooperate and, as applicable, coordinate internal efforts to develop and implement policies and activities designed to prevent acts of Corruption in general.

9. Sanctions

Failures to comply with this Policy may lead, both for Employees and Third Parties, to administrative, labor, or even criminal sanctions, depending on the seriousness of the particular act, which will be determined in accordance with internal workplace regulations and/or applicable laws, rules and regulations.

Within América Móvil, the Ethics Committee of each Subsidiary shall be the authority of last resort to determine sanctions in the event of default of this Policy, without prejudice to such defaults being also penalized by applicable laws and authorities having jurisdiction.



10. Whistleblower Portal

To file a complaint in connection with any default to this Policy or our Code of Ethics, we have made available the Whistleblower Portal at <https://denuncias.americamovil.com>

You, just like each of the Employees of América Móvil and of the Third parties, are entitled and obliged to report directly to our hierarchical boss, to the Compliance Office, to the Compliance Office of the Subsidiary, or through the Portal of Complaints, any behavior that breaches this Policy or any law, regulation, Policy or internal procedure applicable and in general, any unethical behavior.

Further, it is our duty to cooperate with any internal or external investigation and keep it confidential. Employees who make a false or misleading complaint may be subject to disciplinary actions.

Remember that failures to report a serious breach of ethics may have disciplinary consequences, as you may be covering up an unethical act or a crime. Reports can be made anonymously if the person filing the report wishes to do so; however, we encourage informants to leave some contact details for follow-up during the investigation.

It is important to note that América Móvil has adopted reasonable and justified measures to protect the confidentiality of the complaint and of the complainant; furthermore, we guarantee that no retaliation will be taken against you for filing the complaint.

It is also important to note that nothing in this Policy is meant to discourage employees from reporting any misconduct directly to law enforcement authorities. In such cases, our suggestion is that it should be reported to Legal and/or the Compliance Officer, so that they can cooperate with the authorities, if necessary.

All reports will be investigated by América Móvil's Compliance Officer, who reports to the Audit and Corporate Practices Committee of América Móvil.

The Compliance Officer is in charge of the supervision and operation of the Whistleblower Portal, and will send to the Ethics Committees of each Subsidiary the corresponding complaints, for their proper investigation.

11. Questions and Comments

Should you have any question related to this Policy or any comment or suggestion, write to us to the email yocumplo@americamovil.com



Appendix A – Sponsorship Request Format

Request date: _____

Sponsorship Description
Purpose of Sponsorship:
Description and date of Event:
Sponsorship Amount and payment method:
Benefits of the Sponsorship to América Móvil:
Benefit that the Company will receive from the Sponsorship:
Use of Sponsorship resources:
How did the link for this Sponsorship happen?
Has the Sponsorship Beneficiary received other Sponsorship(s) from the Company in the last twelve months? (Yes / No) If yes, please specify the amount and type of Sponsorship(s).

Sponsorship Policy

América Móvil



Is the Beneficiary a Governmental Entity or a Civil Servant, or does it represent a political party?

(Yes / No)

If yes, please provide details.

Currently, is there a business relationship between the Sponsorship Beneficiary and the Company?

(Yes / No)

If yes, please provide details.

Sponsorship Policy

América Móvil



General Information of the Entity requesting Sponsorship				
Name or Corporate Name:				*Federal Taxpayer Number:
Address:				
Telephone number:				
Website / Social Media:				
Articles of Incorporation or charter:	No.	Notary:	Date of incorporation:	
Name of Legal Representative and data of power-of-attorney				
	Federal Taxpayer Number:			CURP:
Public sector:	Yes / No			

**Please attach a copy of the documentation not more than 3 months old.*

GENERAL DATA OF CONTACT OF THE REQUESTING ENTITY	
Full name:	
Title:	
Email address:	

REQUESTED BY

[Name, role and signature]

REVIEWED BY

Finance and Administration

REVIEWED BY

Compliance Officer

AUTHORIZED BY

Marketing Department

AUTHORIZED BY

CEO



Appendix B – Documentation Required from the Entity requesting the Sponsorship

The following documentation shall be provided by the requesting entity in order to start the paperwork to authorize Sponsorship from the Company:

Complies	Necessary Information
	1. Copy of the Articles of Incorporation.
	2. Copy of the public instrument evidencing that powers were granted to the legal representative.
	3. Official ID of the Legal Representative.
	4. Certificate of Registration with the body responsible for tax collection, or Tax Identification Card.*
	5. Proof of address.
	6. Tax compliance report (current month)
	7. Employer's Registration Card
	8. Copy of the first page of a bank statement of the Institution displaying the account number, the CLABE unique reference number or the information necessary to make transfers*

*The document submitted should be no more than three months old from the date of Sponsorship request.



Appendix C – Due Diligence Report Format

Background check report

Date: _____	
Requesting employee: _____	
Title: _____	
Area: _____	
I. Executive Summary	
II. Initial Information provided by the Entity requesting Sponsorship	
Name or Company Name	
Corporate Purpose	
Contact Name and general information	
Main activities	
Name of board members and key executives	
III. Detail of Findings	
A. General Information	
B. Relations with Government	
Background check (including sanctions, fines and debarment)	
D. Potentially adverse information	



V. Appendices

[Empty box for appendices]

PREPARED BY

REVIEWED BY

[Name, role and signature]

Compliance Officer



Appendix D – Due Diligence Information Sources

An effective reputation and background investigation, to detect possible Red Flags includes databases and publications from different sources, such as:

1. Compliance databases (*World Compliance, World Check*),
2. Lists of firms and individuals sanctioned and debarred by local, national and international organizations (OFAC, World Bank),
3. Black lists and targeted international action (OFAC, Interpol, FBI, PGR),
4. Search engines (*Google, Bing*),
5. News and the media (local, national and international).

Below is a list of sources of compliance information to consider:

Activity	Description	Items	Findings
A. Search of adverse reports	Search of electronic news and information available to the general public, both domestic and international, in order to verify if there are negative news, articles or reports* that may affect América Móvil's reputation * At least the last 2 years must be reviewed. Print the first four pages of Google search results	<input type="radio"/> Institution	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> Officer	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> Governing board	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> Key employees	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> Directors or key employees (PEP)	Yes <input type="radio"/> No <input type="radio"/>
		Search run on:	
		<input type="radio"/> Internet	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> Other means (specify)	Yes <input type="radio"/> No <input type="radio"/>
Remarks:			
B. PEP Identification/ Foreclosure/ Screening Lists / Black Lists	Review: - PEP - Foreclosure - Screening Lists - Black lists	<input type="radio"/> List of penalized Civil Servants	Yes <input type="radio"/> No <input type="radio"/>
		Licenses used	
		<input type="radio"/> Trace	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> World Compliance	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> World Check	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> Lexis Nexis	Yes <input type="radio"/> No <input type="radio"/>
		<input type="radio"/> Dow Jones	Yes <input type="radio"/> No <input type="radio"/>
Remarks:			



Appendix E – Corruption Red Flags

Below is a list of scenarios and behaviors that, generally, are Red Flags for possible Corruption or Bribery situations.

The risk rating of each scenario is also provided, as well as the measures that should be taken upon identification.

 Alert
<ul style="list-style-type: none">• The contribution is requested by a Government Entity.• Civil Servants or their Relatives are senior executives or members of the governing committee of the entity requesting the Sponsorship.
 Alert
<ul style="list-style-type: none">• Lack of clarity regarding the purpose of the entity requesting the Sponsorship.• Lack of clarity regarding the use of the Sponsorship.• The requesting entity refuses to disclose to the Company the names of the executives or members of the governing committee of the entity requesting the Sponsorship.• Lack of documentation or incorrect information provided by the requesting entity.• The contribution is a condition to complete or speed up paperwork submitted to certain authority.• The contribution is a condition to establish or maintain certain business relationship.• Negative information (in connection with fraud and/or Corruption) of the requesting entity, its key executives or members of its governing body is found.• The requesting entity, any of its key executives, or members of its governing body, are included in a black list.



Appendix F – Compliance Officer Recommendation Format

Name of the entity requesting the Sponsorship:	Date:
Amount of Sponsorship:	

Background:

Critical points:

Analysis and considerations:

Conclusions:

REVIEWED BY

AUTHORIZED BY

[Name, role and signature]

Compliance Officer



Compliance Officer Recommendations Form Fill-out instructions

Background:

A brief description of the transaction, mentioning:

- Name of the entity requesting Sponsorship
- Type of relation the Company currently has with the requesting entity (supplier, potential Employee, association, etc.)
- The impact of Sponsorship for the requesting entity (value and condition of the transaction)
- Reasons for the Sponsorship
- Commercial benefit for the Company or brand presence

Critical points:

- Potential risk identified (interaction with Government entities or Civil Servants, decision-making power in organizational structure, other)
- Breach of Company policies.

Analysis and considerations:

Consider the Company's values, policies and anti-corruption procedures, as well as the risks it could incur if the transaction is approved. Provide justification for the response regarding compliance or noncompliance with the criteria set by the Company, as well as any specific requirement if the Sponsorship is approved.

Conclusions:

- If someone is deemed/ not deemed to act in a way that is contrary to Company policies if the Sponsorship mentioned above is approved.



Appendix G – Goods Out Format for Sponsorship

I hereby request the list of goods described below, for that certain Sponsorship requested by *[Name of requesting department or area]* in connection with *[Describe the goal of the Sponsorship]*

Date: _____

Requester's Name: _____

Title: _____ Area: _____

Ref.	Description	Unit	Quantity

Remarks:

DELIVERY

I RECEIVED GOODS

[Warehouse Management]

[Name and signature]



Appendix H. Certification of Compliance with Anti- corruption Laws

Date: _____

The Treasury of [Name of Beneficiary] hereby certifies that it has received as Sponsorship [Money, in-kind, services or other (specify)] the quantity of [Quantity and description of the goods and services received] listed below, which were given to us by the Company for the purpose of [Specify the purpose of the Sponsorship].

Quantity	Type of Sponsorship	Description	Check No. or wire transfer reference (if applicable)

(Add as many lines as necessary)

Likewise, I declare under oath that only the elements described and documented in the paragraph above have been received, and that the [goods, money, services or other (specify)] received will not be traded or transferred to a Third Party, and will not be used in violation of any applicable laws. The Sponsorship will only be used in furtherance of my corporate purpose.

Received,

[Signature of the legal representative of the Sponsorship Beneficiary]

Name: [Full name]

Title: [Job position of the person who certifies]