

Occupational Safety and Health Policy

América Móvil



1. Introduction

América Móvil, S.A.B. de C.V. and its Subsidiaries (hereinafter, “América Móvil” or the “Company”) have made it a priority to offer workplace conditions that have a positive impact on the safety and health of its Employees and contribute, indirectly, to the achievement of increased productivity levels and lower absenteeism rates and to the development of a Positive Workplace Environment throughout the organization.

The Company has developed an Integrity and Compliance Program that includes its Code of Ethics and the foregoing Policy. The violation of the Company’s Code of Ethics, internal policies and/or the applicable occupational safety and health laws, in Mexico or abroad, may result in civil and criminal penalties ranging from monetary fines to imprisonment for both the offender and the Company.

2. Purpose

The purpose of this Occupational Safety and Health Policy is to define the principles and guidelines as to occupational safety and health that allow for the maintenance of a Positive Workplace Environment in which fostering and preserving the safety, health and well-being of our Employees and visitors is paramount, and to lay the foundations for the development of a culture characterized by a preventive approach toward safety and health and an adequate management of the latent, potential and inherent risks associated therewith.

This Occupational Safety and Health Policy serves as notice of the conducts and actions expected from our Employees and from Third Parties as with respect to their interactions with each other and with our contractors, customers and others, so as to protect the Company and its Employees and shareholders, as well as Third Parties, against potential violations of our Code of Ethics, internal policies and/or the applicable laws.

3. Scope

This Occupational Safety and Health Policy is applicable to and mandatory for each and all of our Employees and Third Parties in each of the countries in which we operate. Accordingly, it is critical for you to know, understand and put into practice the principles and values herein set forth.

4. Definitions

Occupational Accident or Incident: An occurrence at work or during the performance of job duties, which results or may result in personal injury or adverse health consequences.

Positive Workplace Environment: That which fosters an Employee’s sense of belonging within the Company, moral values, team spirit, proactive collaboration and communication with their co-workers, individual growth and an optimum balance between their professional and private lives through the maintenance of a pleasant work atmosphere, the provision of adequate training for the performance of their job duties, the precise definition of their responsibilities, the adequate distribution of the workload among regular work shifts in accordance with the applicable laws, and the assessment and recognition of their performance.

Occupational Safety and Health Policy

América Móvil



Employee: Any individual employed by América Móvil or any of its Subsidiaries pursuant to an individual employment contract or a collective bargaining agreement.

Complaints Portal: The internal platform developed by the Company to enable its Employees and Third Parties to report, anonymously and confidentially, any violation of América Móvil's Code of Ethics and/or policies, which is available at <https://denuncias.americamovil.com>.

Integrity and Compliance Program: The program developed and monitored by our Compliance Department that encompasses, among other things, (i) the policies and guidelines for ensuring the Company's compliance with the applicable laws, (ii) the processes for the identification, prevention and mitigation of the Company's operational and legal risks, so as to preserve its reputation over the long term and allow for increased certainty throughout its value chain, (iii) adequate and effective control, oversight and audit systems to ascertain on a regular basis the ongoing satisfaction of the Company's integrity standards throughout the organization, and (iv) the policies relating to the operation of the Company's Complaints Portal and the coordination of the Company's training programs as with respect to compliance matters.

Risk: The correlation between one or more hazards and a worker's exposure thereto, which may have an adverse effect on their life, physical integrity or health or result in damages to the workplace.

Subsidiary: Any entity controlled by América Móvil.

Third Party: Any supplier, representative, advisor, commercial partner, agent, intermediary, customer, contractor, processor, lobbyist, consultant or vendor within América Móvil's value chain or who represents the Company in connection with its interactions with Third Parties, government agencies or public officials.

5. General Guidelines

5.1. Our Company

At América Móvil, we recognize that our Employees are key to our success. Accordingly, we strive to ensure their safety and protect their health in order to make a difference in both their professional and personal lives. To this end, we abide by the legal framework in effect in each of the countries in which we operate, and we work tirelessly to remain in line with international best practices.

As part of our culture as it relates to occupational safety and health, we conduct ourselves in accordance with the following criteria:

- Adoption of a preventive approach in order to eliminate hazards, lower the number of Workplace Accidents and Incidents and minimize all risks, including those of an ergonomic and psychosocial nature, as a means for achieving our goal of zero-fatalities and disabling incidents and our other internal objectives as with respect to safety and health;
- Maintenance of safe and healthy conditions to prevent injuries or detrimental effects on the health of our Employees as a result of their work for our Company, taking into account the context, the specific nature of the risks and opportunities relating to safety and health



and the Employees' exposure to tools, substances, chemical products, machinery and workplace conditions;

- Oversight of the processes for identifying, assessing and addressing safety and health-related risks and hazards in order to prevent the occurrence or recurrence of Workplace Accidents or Incidents;
- Institution of safety and health awareness and training programs for all Employees in order to enable them to steer clear of unsafe situations and respond in a timely fashion to unforeseen events (e.g., fire, earthquake, social unrest, etc.), thereby fostering their commitment with the preservation of their own safety and health and those of others;
- Disclosure of the results of our performance assessments with regards to safety, health and well-being on a regular basis, and timely resolution of any identified deviation or risk;
- Ongoing compliance with all applicable occupational safety and health statutes, rules and regulations, and with all the requirements imposed by international and local regulatory authorities and us; and
- Ongoing improvement of our occupational safety and health performance.

5.2. Employees

The achievement of the objectives of this Policy and the ongoing observance of our occupational safety and health management guidelines are dependent on the cooperation of all our Employees. Accordingly, we encourage our Employees to:

- Understand and incorporate in their day-to-day activities the lessons learned through our safety and health awareness and training programs;
- Comply with our safety and health guidelines and use all personal protection equipment in a manner consistent with the nature of their job duties, particularly where such duties are of a high-risk nature;
- Drive carefully and without distraction, always wear a seatbelt, refrain from using mobile devices except (where safe) in hands-free mode or after pulling over to answer a call, and obey all signals and the applicable laws;
- Assume responsibility for their own safety and account for their own actions;
- Ensure that all our Employees, contractors, customers and Third Parties abide by our health and safety directives while inside our facilities; Where necessary, call out, halt and report any unsafe conduct of which they become aware, without fear of retaliation; and
- Report anyone's failure to comply with this Policy.

6. Prevention

For purposes of the prevention of safety and health-related risks and Workplace Accidents or Incidents, we, the Company, and you, as an Employee of América Móvil or as a Third Party, undertake to:

- i. Abide by our Code of Ethics, this Occupational Safety and Health Policy and our other policies, the international conventions on safety and health, international law and the laws of each of the countries in which we operate;
- ii. Protect of our safety and health and those of our colleagues, contractors, customers and others while within our facilities, by:



- disseminating the safety and health regulations in effect in our facilities;
 - implementing in our day-to-day activities the lessons learned through our safety and health awareness and training campaigns;
 - using personal protection equipment;
 - complying with our risk management plans to prevent the recurrence of Workplace Accidents or Incidents; and
 - immediately reporting any deviation from the above to our Safety and Health Department.
- iii. Call out, halt and report any unsafe conduct of which we become aware, without fear of retaliation.
- iv. Implement internal controls and, where necessary, report through our Complaints Portal and/or to the competent authorities any conduct by an Employee or a Third Party which is in violation of our Code of Ethics, this Occupational Safety and Health Policy or the law.

7. Occupational Safety and Health Compliance Assessment, Oversight, Verification and Auditing

Our Compliance and Internal Audit departments are responsible for overseeing, verifying and auditing the observance of the provisions contained in this Occupational Safety and Health Policy, assessing from time to time their effectiveness and taking any such actions as they may deem necessary to maximize it.

Our Compliance Department is also responsible for assessing on a regular basis the effectiveness of our Integrity and Compliance Program, which includes a series of guidelines designed to prevent the implementation of potentially offensive marketing, advertising and communication strategies and campaigns.

We audit our various departments on a regular basis and may perform random audits where warranted by the circumstances.

All Employees are required to support and cooperate with the teams responsible for performing such audits and to refrain from hindering or obstructing their work or providing false or inaccurate information.

Remember that each of us is required to comply with and ensure the observance of this Occupational Safety and Health Policy and to report any conduct which is violation thereof through our Complaints Portal, <https://denuncias.americamovil.com/>.

8. Training

We believe that understanding and putting into practice the principles set forth in this Policy is critical to the development of a culture of transparency, ethical conduct and values. América Móvil offers to its Employees and to Third Parties online and in person courses to better enable them to understand specific concepts, scopes and scenarios and to discuss any concerns that may arise in connection with the performance of their day-to-day duties. The timing for these courses will be announced by the Company through its official communication channels. We are each expected to attend the designated sessions, comply with the applicable timing requirements and submit to any requisite assessments.



9. Penalties

The violation of this Occupational Safety and Health Policy by any Employee or Third Party may result in the imposition of administrative, employment and criminal penalties under the relevant workplace regulations and/or the applicable laws, depending on the nature of the offense.

The Ethics Committee of each Subsidiary of América Móvil is vested with powers and authority to impose any such penalties as it may determine appropriate as a result of the violation of this Occupational Safety and Health Policy, without prejudice of any other penalties prescribed by law or imposed by the competent authorities.

10. Complaints Portal

If you wish to report a violation of this Occupational Safety and Health Policy or our Code of Ethics, you may do so through our Complaints Portal, <https://denuncias.americamovil.com>.

Each and every Employee of América Móvil and Third Party has the right and an obligation to report to their direct supervisor or our Compliance Department, or through our Complaints Portal, any conduct which is in violation of our Code of Ethics or internal policies or procedures or the applicable law, or which is otherwise unethical.

Further, we are each required to cooperate with any internal or independent investigation and to observe confidentiality with respect thereto. Any Employee who is found to have submitted a false or malicious report may be subject to disciplinary action.

Keep in mind that your failure to report a material ethical violation could result in disciplinary action against you and could constitute a cover-up under criminal law. If you wish, we may submit your complaint anonymously. However, we would encourage you to provide us with contact information for follow-up purposes as part of our investigation.

América Móvil has adopted every reasonable and justifiable measure to protect the confidentiality of both your report and your identity and wishes to reassure you that you will not be subject to any retaliatory action as a result of any such report. No provision of our Code of Ethics should be construed so as to limit anyone's ability to report any misconduct to the competent authorities directly. In such event, we would encourage you to give notice of such report to our Legal Department in order to enable it to cooperate with the relevant authority.

All reports will be addressed by our Compliance Department, which reports to América Móvil's Audit and Corporate Practices Committee. Our Compliance Department is responsible for overseeing the operation of our Complaints Portal and will forward any report submitted through such portal to the Ethics Committee of the relevant Subsidiary for its investigation.