

COMMUNICATIONS TRANSPARENCY REPORT

2024

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INTRODUCTION; SCOPE OF THE REPORT

América Móvil, S.A.B. de C.V. (together with its subsidiaries, "AMX") remains steadfast in its commitment to the protection of the fundamental rights to privacy and freedom of expression as a means for fostering the development of a better-informed society.

We strive to safeguard our customers' rights to the protection of their personal data and the privacy of their communications. Our efforts in this regard have contributed significantly to our ability to preserve our customers' and investors' trust in our Company and to keep intact the reputation by which we have been characterized since we first began our international expansion.

Our Communications Transparency Report 2024 (this "Report") contains a detailed description of our policies for handling, reviewing, processing and responding to the inquiries received by our operating subsidiaries from Competent Authorities throughout the year in each of the countries in which we operate. Our operating subsidiaries are tasked with serving as beacons at both the local and international levels when it comes to protecting and safeguarding the information they collect and to complying with the laws relating to government investigations and the administration of justice, among others.

In addition, consistent with our commitment to transparency, this Report contains statistical information, by country and region, about all of the inquiries by Competent Authorities we received, reviewed, processed and either fulfilled or declined to fulfill in the jurisdictions in which we operate in 2024, including all of the inquiries by foreign government agencies that we determined to be lawful and warranting a response.

Thus, this Report is intended to serve as a consultation and reference resource to identify the applicable laws of and the types of inquiries raised at the local level in each of the jurisdictions in which we operate.

¹We define "Competent Authority" as any government entity that is vested with the power and authority, under the laws of the relevant jurisdiction, to compel telecommunications carriers (whether directly or upon a court order or the satisfaction of certain requirements) to cooperate in such entity's efforts in connection with the enforcement of security measures and the administration of justice.



OUR TRANSPARENCY FRAMEWORK

At AMX, we are committed with the protection of human rights, including the freedom of expression. Accordingly, we only provide information to the Competent Authorities where and to the extent required by the applicable laws of the relevant jurisdiction.

We have established stringent security protocols and implemented exacting strategies and procedures for complying with our disclosure obligations and ensuring that any information we may provide as a result of such obligations is kept confidential.

Our comprehensive security strategy, which is founded on the three pillars of our operating vision —Integrity, Availability and Confidentiality—, encompasses (i) cybersecurity, (ii) data privacy and (iii) communications privacy.²

We use IT tools to manage our customers' data in a systematic and structured manner, perform a number of data classification processes and combine, structure or export various types of reports in a single file, as needed.

In addition, we use a combination of data processing platforms that trigger information extraction and enhancement processes in an agile and transparent manner in order to ensure that all inquiries are addressed in a prompt and timely fashion.

For a breakdown of the inquiries we received, reviewed, processed and either fulfilled or declined to fulfill, by country and region, see "ORFI Statistics" below.

We address all the inquiries we receive from Competent Authorities in the manner prescribed by the laws of the relevant jurisdiction, which generally provide that our obligation to turn over any information or intervene in any communication shall be enforceable solely and exclusively upon receipt of an official notice or order of a Competent Authority (an "Official Request for Information," or "ORFI").

Every ORFI must (i) identify the statutes and describe the facts on which it is grounded, (ii) pertain to matters within the jurisdiction of the issuer and provide assurance to the effect that private communications will be kept secret upon verification of which our relevant subsidiary, if a telecommunications carrier (as denoted by its name), will detonate its process for responding to such ORFI in the manner prescribed by the laws of its home country and with our Privacy and Personal Data Protection Policy, irrespective of whether the ORFI was made by electronic means or in print) and (iii) be issued by a Competent Authority.

² For additional information regarding our policies and procedures in Chile and Peru, see Política de Requerimientos and Protocolo de Atención de Requerimientos Sobre el Levantamiento del Secreto de las Telecomunicaciones, respectively, which are available at https://www.clarochile.cl/portal/cl/archivos_generales/politica-de-requerimientos-de-informacion-claro-2024.pdf and https://www.claro.com.pe/portal/pe/recursos_contenido/pdf/1744652187065-Informe_Anual_LST_2024.pdf, respectively.



We will not honor any inquiry that fails to meet the aforementioned criteria or which is in violation of the applicable laws. This means that we will not address any request for information by any person (i.e., any individual or entity, whether public or private) other than a Competent Authority.

In order to ensure our compliance with our obligations, we have implemented a stringent set of security protocols, established specific criteria and assigned dedicated teams to ascertain the validity of each and every inquiry we receive from a Competent Authority.

We only process, record and address those requests for information that comply with the procedural requirements set forth in the laws of the relevant jurisdiction and that are delivered to us through official communication channels. Accordingly, this Report is exclusive of those instances in which the Competent Authorities accessed our systems to retrieve information directly pursuant to their statutory powers, as was the case in Brazil, Colombia, Costa Rica, Ecuador, El Salvador, Honduras and Nicaragua.

As required by law, we do not notify our customers of our receipt of an ORFI or other inquiry about them. In addition, we do not publish in our websites or otherwise disclose the contents of any ORFI we may have received or the nature of any information we may have provided to third parties for public record purposes in response thereto.

The privacy of our customers' communications is of paramount importance to us. Accordingly, we abide by the following principles:

- No one may listen to or monitor any conversation, data transmission or other type of communication, nor disclose its existence or content, except upon a duly substantiated written order of a Competent Authority;
- ii. No one may turn over any personal data, geolocate a mobile device, block or impose any service restrictions on a telephone line or keep track or a log of the communications associated therewith, except where required by law and upon a duly substantiated order of a Competent Authority; and
- iii. No one may engage in the prioritization, blocking or throttling of any traffic, application, protocol or content. All of our operations comply with the standards relating to net neutrality and zero-rating. Under no circumstance may any application traffic be given priority over other network traffic.



PROCEDURE FOR ADDRESSING ORFIS

This section contains a detailed description of the procedure we employ for addressing the ORFIs we receive (whether by electronic means or in print) from Competent Authorities³ in view of our cooperation obligations thereto, which procedure is substantially the same in all of the countries in which we operate.

We will regard as lawful any ORFI which meets the procedural requirements set forth in the applicable laws of the relevant country and is delivered to us in writing. For a list of the laws currently in effect in each of the countries in which we operate, see "Regulatory Framework" below.

Upon receipt of an ORFI (which may relate to a single matter or to several matters), our applicable internal area performs a review and assessment of such ORFI, which entails the following:

- Legal analysis⁴ of the ORFI, to ascertain its validity and the subject matter jurisdiction of the issuer;
- Upon verification of the satisfaction of all the applicable legal requirements, the activation of our data extraction processes to gather the information requested by the Competent Authority;
- Preparation of a formal response to the Competent Authority, either fulfilling or declining to fulfill the ORFI;
 and
- Delivery of AMX's response to the Competent Authority by any such means as we may determine necessary
 and adequate to preserve the integrity and confidentiality of the information contained therein, as the case
 may be.⁵

The period of time available for responding to the ORFIs issued by the Competent Authorities varies from one country to another and ranges from 24 hours (e.g., in Mexico and El Salvador) to 15 business days (e.g., in Brazil and Colombia).⁶

We will decline to fulfill any ORFI which does not meet the requirements set forth in the applicable laws and will give notice of our refusal to the issuer of such ORFI within the periods of time specified in the preceding paragraph.

The laws of the countries in which we operate authorize us to address ORFIs issued by foreign government agencies, provided that such ORFIs satisfy the formalities and comply with all the procedural requirements that are necessary for foreign government documents generally to be valid.

³ For these purposes, Competent Authority includes any government entity vested with judicial, administrative or other powers under the laws of the relevant country. However, we employ one and the same procedure for addressing all ORFIs irrespective of the nature of the powers of their issuers.

⁴ Defined as the process for determining whether an ORFI was issued by one of the government agencies identified in "Regulatory Framework" below, relates to one or more of the conducts described therein and identifies the statutes on which it is grounded.

⁵ In El Salvador, only, the Competent Authorities are responsible for picking up the requested information at our office.

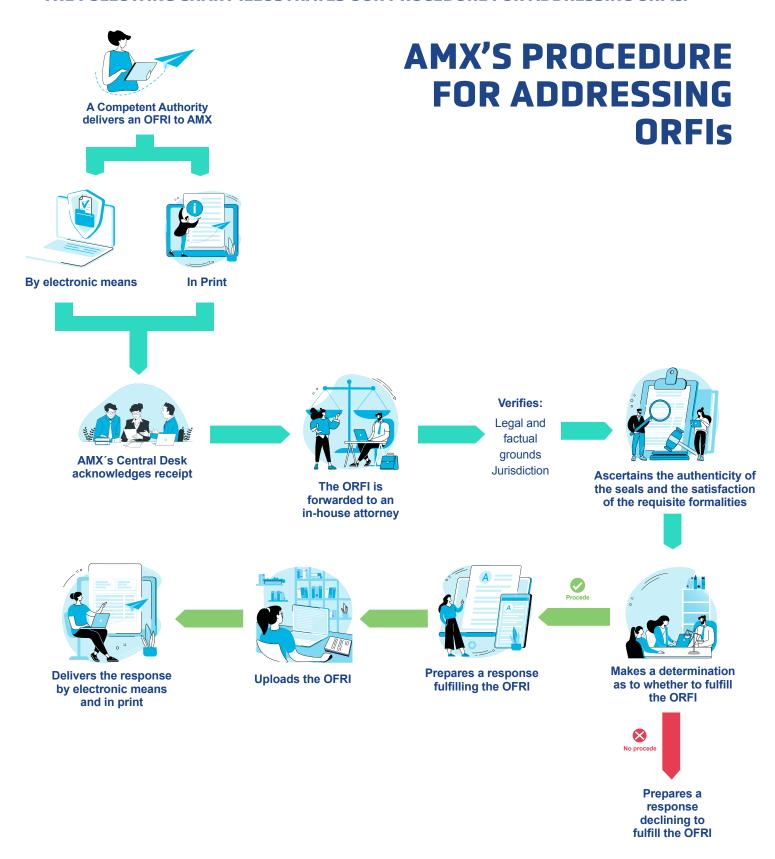
⁶ Under the laws of Argentina, Chile, Ecuador, Guatemala, Honduras and the Dominican Republic, the period of time available for responding to an ORFI is determined by the Competent Authority on a case-by-case basis and stipulated in the relevant ORFI.

In Nicaragua, neither the applicable laws nor the ORFIs provide for any specific period of time for responding to the latter.

In Costa Rica, while the applicable laws do not provide for any specific period of time for responding to ORFIs, we and the Competent Authorities have entered into an agreement pursuant to which we are required to respond to their ORFIs within certain specific time frames that range from four hours to three business days depending on the type of action required of us.



THE FOLLOWING CHART ILLUSTRATES OUR PROCEDURE FOR ADDRESSING ORFIS.





REGULATORY FRAMEWORK

Every ORFI must comply with the formalities required by the applicable laws. We will decline to fulfill any ORFI which does not specify the statutes and facts on which it is grounded, irrespective of whether such ORFI was issued by a Competent Authority with subject matter jurisdiction.

The following table sets forth (i) the statutes pursuant to which we are required to cooperate with the Competent Authorities in connection with security matters and the administration of justice, (ii) the scope of our obligations in that regard and (iii) the Competent Authorities that are authorized to issue ORFIs.

MEXICO	
Applicable statutes	 Political Constitution of the United Mexican States (Constitución Política de los Estados Unidos Mexicanos) Federal Telecommunications and Broadcasting Law (Ley Federal de Telecomunicaciones y Radiodifusión) Federal Law on the Protection of Personal Data Held by Private Persons (Ley Federal de Protección de Datos Personales en Posesión de los Particulares) National Code of Criminal Procedure (Código Nacional de Procedimientos Penales) Organic Law of the Judicial Branch of the Federation (Ley Orgánica del Poder Judicial de la Federación) Federal Law Against Organized Crime (Ley Federal Contra la Delincuencia Organizada) General Law on the Prevention and Punishment of Kidnapping, Enacted Under Article 73(XXI) of the Political Constitution of the United Mexican States (Ley General para Prevenir y Sancionar los Delitos en Materia de Secuestro, Reglamentaria de la fracción XXI del artículo 73 de la Constitución Política de los Estados Unidos Mexicanos) Guidelines for the Provision of Collaboration in Connection with Security and Justice Matters (Lineamientos de Colaboración en Materia de Seguridad y Justicia)
Scope of our obligations	 Delivery of data records to the Competent Authorities Geolocation of mobile devices in real time Interception of private communications Discontinuance of telecommunications services upon a court order Blocking of communication lines associated with criminal activities
Competent Authorities	The heads of the agencies responsible for security matters and the administration of justice, and the public officials designated thereby



CENTRAL AMERICA⁷

COSTA RICA	
Applicable statutes	Law Against Organized Crime (Ley Contra la Delincuencia Organizada), or Law No. 8754 General Telecommunications Law (Ley General de Telecomunicaciones), or Law No. 8642 Law on the Registration, Seizure and Examination of Private Documents and the Interception of Communications (Ley sobre Registro, Secuestro y Examen de Documentos Privados e Intervención de las Comunicaciones), or Law No. 7425 Code of Criminal Procedure (Código Procesal Penal), or Law No. 7594
Scope of our obligations	Delivery of data records to the Competent Authorities Geolocation of mobile devices in real time Interception of private communications Discontinuance of telecommunications services upon a court order Blocking of communication lines associated with criminal activities
Competent Authorities	The heads of the agencies responsible for security matters and the administration of justice, and the public officials designated thereby Public prosecutors (Ministerio Público) General Directorate of the Agency for Judicial Investigation (Dirección General del Organismo de Investigación Judicial, or OIJ) Center for the Judicial Interception of Communications (Centro Judicial de Intervenciones de las Comunicaciones, or CJIC) Costa Rican Drug Institute (Instituto Costarricense de Drogas, or ICD) Judicial Branch (i.e., the judges authorized to issue ORFIs)

EL SALVADOR	
Applicable statutes	 Constitution of the Republic of El Salvador (Constitución de la República de El Salvador) Telecommunications Law (Ley de Telecomunicaciones) Special Law on the Interception of Telecommunications (Ley Especial para la Intervención de las Telecomunicaciones) Anti-money and Anti-asset Laundering Law (Ley Contra el Lavado de Dinero y de Activos) Cybersecurity and Information Security Law (Ley de Ciberseguridad y Seguridad de la Información)
Scope of our obligations	 Delivery of data records to the Competent Authorities Maintenance of a registry of users (which must remain available to the Competent Authorities) Geolocation of mobile devices Interception of private communications Discontinuance of telecommunications services upon a court order
Competent Authorities	Public prosecutors (<i>Ministerio Público</i>) Criminal court judges

GUATEMALA	
Applicable statutes	 Political Constitution of the Republic of Guatemala (Constitución Política de la República de Guatemala) Code of Criminal Procedure (Código Procesal Penal), or Decree No. 51-92 Law Against Organized Crime (Ley Contra la Delincuencia Organizada), or Decree No. 21-2006, and the Regulations issued thereunder, or Government Resolution No. 158-2009 Law on the Forfeiture of Assets (Ley de Extinción de Dominio), or Decree No. 55-2010 Tax Code (Código Tributario), or Decree No. 6-91 Law on Mobile Devices (Ley de Equipos Terminales Móviles), or Decree No. 8-2013
Scope of our obligations	Delivery of data records to the Competent Authorities Geolocation of mobile devices in real time Interception of private communications Discontinuance of telecommunications services upon a court order Blocking of communication lines associated with criminal activities
Competent Authorities	Public prosecutors (Fiscales del Ministerio Público) Criminal court judges

 $^{^{\}rm 7}$ Includes our operations in Costa Rica, El Salvador, Guatemala, Honduras and Nicaragua.



HONDURAS	
Applicable statutes	Constitution of the Republic of Honduras (Constitución de la República de Honduras) Framework Law for the Telecommunications Sector (Ley Marco del Sector de Telecomunicaciones) Special Law on the Interception of Private Communications (Ley Especial de Intervención de las Comunicaciones Privadas) Criminal Code (Código Penal) Special Law on the Office of the Public Prosecutor (Ley Especial del Ministerio Público) Code of Criminal Procedure (Código de Proceso Penal) Code of Civil Procedure (Código Procesal Civil) Regulations Under the Law for the Telecommunications Sector (Reglamento de la Ley del Sector Telecomunicaciones)
Scope of our obligations	Delivery of data records to the Competent Authorities Geolocation of mobile devices in real time Interception of private communications Discontinuance of telecommunications services upon a court order Blocking of communication lines associated with criminal activities
Competent Authorities	The heads of the agencies responsible for security matters and the administration of justice, and the public officials designated thereby: Public prosecutors (Ministerio Público) Judicial Branch Ministry of Security (Secretaría de Seguridad), acting through its Directorate for Disciplinary Police Matters (Dirección de Asuntos Disciplinarios Policiales, or DIDAPOL)

NICARAGUA	
Applicable statutes	 Criminal Code (Código Penal), or Law No. 641 Code of Criminal Procedure (Código Procesal Penal), or Law No. 406 Law on the Prevention, Investigation and Prosecution of Organized Crime and the Administration of Seized, Confiscated and Abandoned Property (Ley de Prevención, Investigación y Persecución del Crimen Organizado y de la Administración de los Bienes Incautados, Decomisados y Abandonados), or Law No. 735 Special Law on Cybercrimes (Ley Especial de Ciberdelitos), or Law No. 1042 Family Code (Código de Familia), or Law No. 870 Organic Law of the Judicial System of the Republic of Nicaragua (Ley Orgánica del Sistema Judicial de la República de Nicaragua), or Law No. 1244 Rules for the Preservation of Data and Information (Normativa para Preservación de Datos e Información), or Administrative Resolution No. 001-2021
Scope of our obligations	 Delivery of data records to the Competent Authorities Geolocation of mobile devices in real time Interception of private communications Discontinuance of telecommunications services upon a court order Blocking of communication lines associated with criminal activities
Competent Authorities	Judicial and police authorities

ANDEAN REGION⁸

CHILE	
Applicable statutes	 Political Constitution of the Republic of Chile (Constitución Política de la República de Chile) Code of Criminal Procedure (Código Procesal Penal) Regulations on the Interception and Recording of Telephone Conversations and Other Forms of Telecommunications (Reglamento sobre interceptación y grabación de comunicación telefónicas y otras formas de telecomunicación), or Decree No. 142 of 2005 of the Ministry of Transportation and Telecommunications (Ministerio de Transporte y Telecomunicaciones) Decree-Law No. 211, Which Sets Forth the Rules for the Defense of Free Competition (Decreto Ley No. 211 que Fija Normas para la Defensa de la Libre Competencia)
Scope of our obligations	Geolocation of mobile devices in real time Interception of private communications
Competent Authorities	The following courts of the Judicial Branch: Illustrious Courts of Appeals (<i>Ilustrisimas Cortes de Apelaciones</i>) The Most Honorable Supreme Court (<i>Excelentisima Corte Suprema</i>) Civil, labor, family and guarantee courts Public prosecutors (<i>Ministerio Público</i>) Office of the National Economic Prosecutor (<i>Fiscalia Nacional Económica</i>)

⁸ Includes our operations in Chile, Colombia, Ecuador and Peru.



COLOMBIA	
Applicable statutes	 Political Constitution of Colombia (Constitución Política de Colombia) of 1991 Law 906 of 2004 Law 1066 of 2006 Law 1341 of 2009 Law 1437 of 2011 Law 1621 of 2013 Decree 1704 of 2012 Tax Code (Estatuto Tributario)
Scope of our obligations	 Delivery of data records to the Competent Authorities Geolocation of mobile devices in real time Interception of private communications Discontinuance of telecommunications services upon a court order
Competent Authorities	 Attorney General of the Nation (Fiscalía General de la Nación), acting through the Judicial Police (Policía Judicial) The heads of the security agencies and the public officials designated thereby Judicial Branch Department of Revenue and National Customs (Dirección de Impuestos y Aduanas Nacionales, or DIAN) The government agencies authorized to collect biographical information

ECUADOR	
Applicable statutes	Constitution of the Republic of Ecuador (Constitución de la República de Ecuador) Organic Telecommunications Law (Ley Orgánica de Telecomunicaciones) General Regulations Under the Organic Telecommunications Law (Reglamento General a la Ley Orgánica de Telecomunicaciones) Law on Public Security and the Security of the State (Ley de Seguridad Pública y del Estado) Integrated Organic Criminal Code (Código Orgánico Integral Penal) Concession agreements
Scope of our obligations	Delivery of data records to the Competent Authorities Geolocation of mobile devices in real time Interception of private communications Discontinuance of telecommunications services upon a court order Blocking of communication lines associated with criminal activities
Competent Authorities	Judges of competent jurisdiction Office of the Attorney General Intelligence agencies (upon a court order) Superintendency for the Protection of Personal Data (Superintendencia de Protección de Datos Personales) Superintendency of Economic Competition (Superintendencia de Competencia Económica) National Telecommunications Regulation and Control Agency (Agencia de Regulación y Control de las Telecomunicaciones, or ARCOTEL) Internal Revenue Service (Servicio de Rentas Internas, or SRI), solely and exclusively within the limits of its jurisdiction



PERU	
Applicable statutes	 Amended and Restated Telecommunications Law (<i>Texto Unico Ordenado de la Ley de Telecomunicaciones</i>), or Supreme Decree No. 013-93-TCC Amended and Restated Regulations Under the Telecommunications Law (<i>Texto Unico Ordenado del Reglamento General de la Ley de Telecomunicaciones</i>), or Supreme Decree No. 020-2007-MTC Code of Criminal Procedure (<i>Código Procesal Penal</i>) enacted by means of Legislative Decree No. 957 Law that Empowers the Attorney General to Intercept and Control Private Communications and Documents Under Exceptional Circumstances (<i>Ley que Otorga Facultad al Fiscal para la Intervención y Control de Comunicaciones y Documentos Privados en Caso Excepcional</i>), or Law No. 27697 Measures Intended to Safeguard the Right to the Inviolability and Secrecy of Telecommunications, to Protect Personal Data and to Regulate the Exercise of the Oversight and Control Powers of the Ministry of Transportation and Communications (<i>Norma que establece medidas destinadas a salvaguardar el derecho a la inviolabilidad y el secreto de las telecomunicaciones y la protección de datos personales y regula las acciones de supervisión y control a cargo del Ministerio de Transportes y Comunicaciones</i>), or Ministerial Resolution No. 111-2009-MTC/03 Measures Intended to Regulate the Use of Telecommunications-related Data for the Identification, Location and Geolocation of Communication Devices Within the Context of the Fight Against Delinquency and Organized Crime (<i>Norma que regula el uso de los datos derivados de las telecomunicaciones para la identificación, localización y geolocalización de equipos de comunicación en la lucha contra la delincuencia y el crimen organizado), or Legislative Decree No. 1182</i> Law for the Development of the Powers and Duties of the Supervisory Agency for Private Investimant in Telecommunicacions (<i>Ley de Desamollo de las Funciones y Facultades del Organismo Supervisor de Inversión Privada en Telecommunicaciones</i>
Scope of our obligations	Delivery of data records to the Competent Authorities Geolocation of mobile devices in real time Interception of private communications Discontinuance of telecommunications services upon a court order Blocking of communication lines associated with criminal activities Preservation of the information and data collected as a result of the provision of telecommunication services
Competent Authorities	Attorneys General (at both the national and local levels) National Police of Peru and its members Public prosecutors Members of the Peruvian Congress Other government agencies In each case, subject to the terms of the relevant court order



SOUTHERN CONE⁹

ARGENTINA	
Applicable statutes	 Constitution of the Argentine Nation (Constitución de la Nación Argentina) National Telecommunications Law (Ley Nacional de Telecomunicaciones), or Law 19798 Law on the Digitalization of Argentina (Ley Argentina Digital), or Law 27.078 National Intelligence Law (Ley de Inteligencia Nacional), or Law No. 25520; Decree No. 256/2015; and Supreme Court decisions 2/2016 and 30/2016 Amended and Restated Federal Code of Criminal Procedure (Texto Ordenado del Código Penal Federal), or Decree No. T.O. 118-2019) National and provincial codes of legal procedure.
Scope of our obligations	Delivery of data records to the Competent Authorities Geolocation of mobile devices in real time Interception of private communications Discontinuance of telecommunications services upon a court order Blocking of communication lines associated with criminal activities
Competent Authorities	For purposes of interception requests and the maintenance of communication with carriers in connection therewith: Directorate for Legal Assistance in Connection with Complex Crimes and Organized Crime (Dirección de Asistencia Judicial en Delitos Complejos y Crimen Organizado, or "JUDECO") For purposes of the issuance of ORFIs: Judges, if relating to the Interception of private communications Public prosecutors, if relating to kidnapings for ransom Attorneys General

	PARAGUAY
Applicable statutes	National Constitution of Paraguay (Constitución Nacional del Paraguay) Regulations issued by the National Telecommunications Commission (Comisión Nacional de Telecomunicaciones); Directorate's Resolution No. 583/2020 Directorate's Resolution No. 1350/2002 Directorate's Resolution No. 2377/2021 Law No. 4739 that Creates the 911 Emergency Response, Dispatch, and Communications Management System (Ley 4739/2013 que crea el Sistema 911 de atención, despacho y seguimiento de comunicaciones de emergencias) Code of Criminal Procedure (Código Procesal Penal)
Scope of our obligations	 Delivery of data records to the Competent Authorities Geolocation of mobile devices in real time Interception of private communications Blocking of telephone lines
Competent Authorities	Judges Public prosecutors (Ministerio Público)

URUGUAY			
Applicable statutes	Constitution of the Oriental Republic of Uruguay (Constitución de la República Oriental de Uruguay) Criminal Code (Código Penal) Code of Criminal Procedure (Código de Proceso Penal)		
Scope of our obligations	 Delivery of data records to the Competent Authorities Geolocation of mobile devices in real time Interception of private communications 		
Competent Authorities	 Criminal court judges, upon request of a prosecutor, if the ORFI relates to data records, the geolocation of devices or the interception of communications Criminal court judges, upon request of a prosecutor Attorney General and the Unit for the Regulation of Communication Services (Unidad Reguladora de Servicios de Comunicaciones), if the ORFI requires the provision of data records to a labor or civil court, agency or department 		

 $^{^{\}rm 9}\,{\rm Includes}$ our operations in Argentina, Paraguay and Uruguay.



CARIBBEAN¹⁰

	PUERTO RICO
Applicable statutes	a. Enacted by the government of the United States: Constitution of the United States of America Telecommunications Act of 1996 Costumer Property Network Stored Wire Electronic Communications Act, 18 U.S.C. Foreign Intelligence Surveillance Act of 1978 (FISA) Electronic Communications Privacy Act (as amended by the Patriot Act) Enacted by the government of the Commonwealth of Puerto Rico: Constitution of the Commonwealth of Puerto Rico Puerto Rico Telecommunications Act of 1996 Rules of Civil Procedure of Puerto Rico Cybersecurity Act of the Commonwealth of Puerto Rico, or Act 40-2024 Regulations Prescribing the Publication of the Privacy Policy Regarding the Management of Citizens' Privace and Personal Data (Reglamento para Implantar la Publicación de la Política de Privacidad en el Manejo de Datos Privados y Personales de Ciudadanos)
Scope of our obligations	Delivery of data records to the Competent Authorities Geolocation of mobile devices in real time Discontinuance of telecommunications services upon a court order Blocking of communication lines associated with criminal activities
Competent Authorities	Court officials Government officials Attorneys General In each case, within the limits of their powers and authority under the laws of the United States and the Commonwealth of Puerto Rico

DOMINICAN REPUBLIC				
Applicable statutes	Constitution of the Dominican Republic (Constitución de la República Dominicana) General Telecommunications Law (Ley General de las Telecomunicaciones), or Law No. 153-98 Code of Criminal Procedure of the Dominican Republic (Código Procesal Penal de la República Dominicana), or Law No. 76-02 Law on Cybercrimes and Misdemeanors (Ley Sobre Crimenes y Delitos de Alta Tecnología), or Law No. 53-07 Decision No. 2043-2003 of the Supreme Court of Justice Decision No. 0200-13 of the Constitutional Tribunal (Tribunal Constitucional)			
Scope of our obligations	Delivery of data records to the Competent Authorities Geolocation of mobile devices in real time Interception of private communications Real-time interception of telecommunications Discontinuance of telecommunications services upon a court order Blocking of communication lines associated with criminal activities			
Competent Authorities	Public prosecutors (Ministerio Público) and ancillary agencies			

BRAZIL				
Applicable statutes	 Constitution of the Federated Republic of Brazil (Constituição da República Federativa do Brasil) General Telecommunications Law (Lei Geral das Telecomunicações) Brazilian Telecommunications Code (Código Brasileiro de Telecomunicações), or Law No. 4117/1962 Civil Rights Framework for the Internet (Marco Civil da Internet), or Law No. 12.965/2014 			
Scope of our obligations	Delivery of data records to the Competent Authorities Geolocation of mobile devices in real time Interception of private communications Discontinuance of telecommunications services upon a court order			
President of the Republic (Executive Branch) Judicial Branch Public prosecutors (Ministério Público) upon request of the Office of the Attorney General (Advocacia-Geral da União) Police authorities or the Police Commissioner Regulatory agencies				

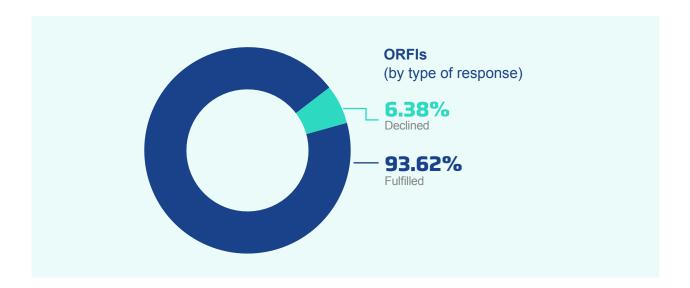
¹⁰ Includes our operations in Puerto Rico and the Dominican Republic.



ORFI STATISTICS

In 2024, we received a total of 864,778 ORFIs. This represented an increase of 53,822 ORFIs, or 6.64%, in the total number of ORFIs received, over 2023.¹¹

We fulfilled 809,566 ORFIs or 93.62% of the total number of ORFIs received, and declined to fulfill for various reasons 55,212 ORFIs or 6.38% of the total number of ORFIs received.



It should be noted that, in order to preserve the confidentiality and ensure the protection of our customers' personal data and communications, we do not engage in any type of analysis or assessment of the information associated with the accounts or individual lines in respect of which we receive ORFIs.

The following table contains a breakdown of the total number of ORFIs received, by country.

¹¹ Includes our operations in Latin America, only. The European laws on the transparency and publication of information prevent our subsidiaries from disclosing this type of data. Accordingly, the statistical information contained in this Report does not include the ORFIs received by our European subsidiaries.



MEXICO		
Total	81,416	
Fulfilled	79,755	
Declined	1,661	

CENTRAL AMERICA

	COSTA RICA	EL SALVADOR	GUATEMALA	HONDURAS ¹²	NICARAGUA
Total	19,765	9,434	19,107	7,061	287
Fulfilled	19,525	9,432	13,949	7,061	274
Declined	240	2	5,158	0	13

ANDEAN REGION

	CHILE	COLOMBIA	ECUADOR	PERU
Total	32,751	37,088	12,178	20,421
Fulfilled	30,911	28,222	6,932	17,972
Declined	1,840	8,866	5,246	2,449

SOUTHERN CONE

	ARGENTINA	PARAGUAY	URUGUAY
Total	123,879	4,704	11,483
Fulfilled	123,442	4,704	11,483
Declined	437	0	0

CARIBBEAN

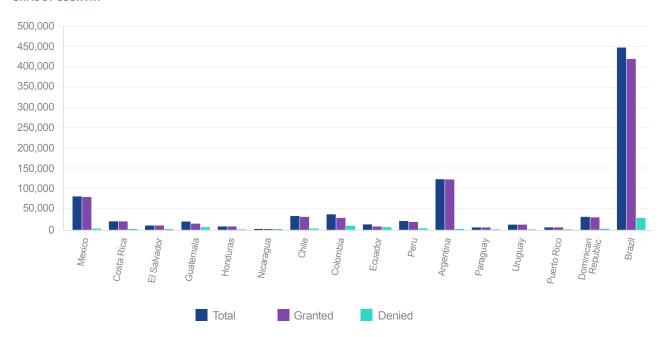
	PUERTO RICO	DOMINICAN REPUBLIC	
Total	4,829	30,845	
Fulfilled	4,829	29,594	
Declined	0	1,251	

BRAZIL				
Total	449,530			
Fulfilled	421,481			
Declined	28,049			

¹² In Honduras, the Competent Authorities failed to pick up at our offices the information we had prepared in response to 847 ORFIs, or 12% of the total number of ORFIs we received from such authorities.



ORFIS BY COUNTRY



Of the total number of ORFIs we fulfilled,¹³ (i) 38.72% pertained to personal data of our customers ("Data Records")¹⁴ and (ii) 61.28% pertained to the provision of access to communications (e.g., interception of telephone calls, discontinuance of service, real-time geolocation and blocking). The following table contains a breakdown of such ORFIs by country.

MEXICO		
Data Records	70,125	
Access to communications	9,630	

CENTRAL AMERICA

	COSTA RICA	EL SALVADOR	GUATEMALA	HONDURAS	NICARAGUA
Data Records	670	9,432	12,048	7,061	274
Access to communications	18,855	0	1,901	0	0

ANDEAN REGION

	CHILE COLOMBIA		ECUADOR	PERU	
Data Records	21,677	21,942	6,932	16,872	
Access to communications	9,234	6,280	0	1,100	

¹³ Upon determination that such ORFIs were valid.

¹⁴ Defined as the files and records relating to customer accounts or which contain personal data.



SOUTHERN CONE

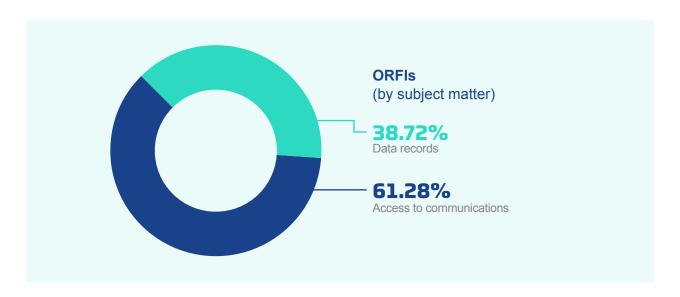
	ARGENTINA	PARAGUAY	URUGUAY
Data Records	108,996	4,555	8,555
Access to communications	14,446	149	2,928

CARIBBEAN

	PUERTO RICO	DOMINICAN REPUBLIC
Data Records	4,756	19,557
Access to communications	73	10,037

BRAZIL

	BRAZIL
Data Records	3
Access to communications	421,478



Of the total number of ORFIs we received from Competent Authorities, ¹⁵ (i) 49.7% were issued by Security Agencies (primarily, police authorities), (ii) 29.7% were issued by members of the Judiciary and (iii) 16.9% were issued by Attorneys General. ¹⁶

¹⁵ For ease of reference, we have classified the Competent Authorities according to the branch of government to which they belong. However, our data bases contain detailed information about the identity of the issuer of each ORFI and the number of the relevant official document.

¹⁶ Includes the ORFIs received from public prosecutors in each of the countries in which we operate.



Of the total number of ORFIs we received from Competent Authorities, we determined that 95.4% of the ORFIs issued by Judicial Authorities, 94.5% of the ORFIs issued by Executive Authorities, 94.3% of the ORFIs issued by Attorneys General and 56.4% of the ORFIs issued by other agencies (i.e., independent agencies and entities which do not constitute executive, legislative or judicial authorities) constituted valid and lawful ORFIs.

The following table contains a breakdown of the total number of ORFIs we received in each of the countries in which we operate and that we fulfilled or declined to fulfill, by type of Competent Authority.

	MEXICO	
	Judicial Branch	4,080
	Executive Branch	3,577
	Security Agencies	0
TOTAL ORFIS BY TYPE OF AUTHORITY	Attorneys General	73,739
	Other	20
	Total	81,416
	Judicial Branch	3,921
	Executive Branch	3,575
FULFILLED	Security Agencies	0
FOLFILLED	Attorneys General	72,239
	Other	20
	Total	79,755
	Judicial Branch	159
	Executive Branch	2
PERINTP	Security Agencies	0
DECLINED	Attorneys General	1,500
	Other	0
	Total	1,661



CENTRAL AMERICA

		COSTA RICA	EL SALVADOR	GUATEMALA	HONDURAS	NICARAGUA
	Judicial Branch	19,765	536	19,064	1,938	286
	Executive Branch	0	2	43	5,050	1
TOTAL ORFIS	Security Agencies	0	0	0	0	0
BY TYPE OF AUTHORITY	Attorneys General	0	8,896	0	73	0
	Other	0	0	0	0	0
	Total	19,765	9,434	19,107	7,061	287
	Judicial Branch	19,525	536	13,949	1,938	273
	Executive Branch	0	0	0	5,050	1
	Security Agencies	0	0	0	0	0
FULFILLED	Attorneys General	0	8,896	0	73	0
	Other	0	0	0	0	0
	Total	19,525	9,432	13,949	7,061	274
	Judicial Branch	240	0	5,115	0	13
	Executive Branch	0	2	43	0	0
	Security Agencies	0	0	0	0	0
DECLINED	Attorneys General	0	0	0	0	0
	Other	0	0	0	0	0
	Total	240	2	5,158	0	13



ANDEAN REGION

		CHILE	COLOMBIA	ECUADOR	PERU	
	Judicial Branch	817	3,314	9,619	3,994	
	Executive Branch	9	790	0	8,187	
TOTAL	Security Agencies	0	18,913	0	0	
ORFIS BY TYPE OF AUTHORITY	Attorneys General	31,925	11,271	2,559	7,925	
	Other	0	2,800	0	315	
	Total	32,751	37,088	12,178	20,421	
	Judicial Branch	806	2,242	5,597	3,866	
	Executive Branch	9	458	0	7,079	
	Security Agencies	0	15,348	0	0	
FULFILLED	Attorneys General	30,096	8,733	1,335	6,844	
	Other	0	1,441	0	183	
	Total	30,911	28,222	6,932	17,972	
	Judicial Branch	11	1,072	4,022	128	
	Executive Branch	0	332	0	1,108	
DECLINED	Security Agencies	0	3,565	0	0	
DECLINED	Attorneys General	1,829	2,538	1,224	1,081	
	Other	0	1,359	0	132	
	Total	1,840	8,866	5,246	2,449	



SOUTHERN CONE

		ARGENTINA	PARAGUAY	URUGUAY	
	Judicial Branch	123,879	328	11,268	
	Executive Branch	0	0	0	
TOTAL	Security agencies	0	0	0	
ORFIS BY TYPE OF AUTHORITY	Attorneys General	0	4,376	3	
	Other	0	0	212	
	Total	123,879	4,704	11,483	
	Judicial Branch	123,442	328	11,268	
	Executive Branch	0	0	0	
EW EW ED	Security agencies	0	0	0	
FULFILLED	Attorneys General	0	4,376	3	
	Other	0	0	212	
	Total	123,442	4,704	11,483	
	Judicial Branch	437	0	0	
	Executive Branch	0	0	0	
	Security agencies	0	0	0	
DECLINED	Attorneys General	0	0	0	
	Other	0	0	0	
	Total	437	0	0	



CARIBBEAN

		PUERTO RICO	DOMINICAN REPUBLIC
	Judicial Branch	279	213
	Executive Branch	0	11,080
TOTAL	Security agencies	3,577	15,001
ORFIS BY TYPE OF AUTHORITY	Attorneys General	973	4,475
	Other	0	76
	Total	4,829	30,845
	Judicial Branch	279	213
	Executive Branch	0	10,992
	Security agencies	3,577	14,015
FULFILLED	Attorneys General	973	4,298
	Other	0	76
	Total	4,829	29,594
	Judicial Branch	0	0
	Executive Branch	0	88
	Security agencies	0	986
DECLINED	Attorneys General	0	177
	Other	0	0
	Total	0	1,251

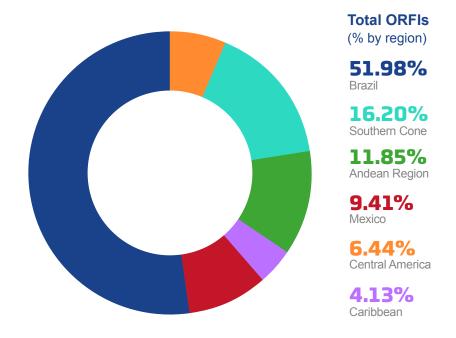


BRAZIL

BRAZIL								
	Judicial Branch	57,563						
	Executive Branch	0						
TOTAL	Security agencies	391,967						
ORFIS BY TYPE OF AUTHORITY	Attorneys General	0						
	Other	0						
	Total	449,530						
	Judicial Branch	56,899						
	Executive Branch	0						
FULFILLED	Security agencies	364,582						
POLFILLED	Attorneys General	0						
	Other	0						
	Total	421,481						
	Judicial Branch	664						
	Executive Branch	0						
DECLINED	Security agencies	27,385						
DECLINED	Attorneys General	0						
	Other	0						
	Total	28,049						

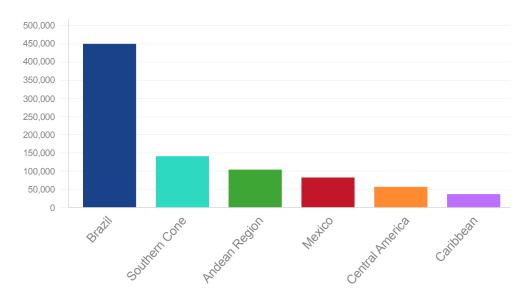
On a regional basis, Brazil accounted for the largest number of ORFIs reported by our subsidiaries in 2024, with 449,530 ORFIs or 51.98% of the total number of ORFIs we received in all of the countries in which we operate, followed by the Southern Cone with 16.20%, the Andean Region with 11.85% and Mexico with 9.41%.





The Southern Cone accounted for the largest percentage of fulfilled ORFIs by region, with 99.69% of the total number of ORFIs received by our subsidiaries in that region, followed by Mexico with 97.96%, the Caribbean with 96.49% and the Andean Region with 82.04%.

ORFIS FULFILLED BY AMX





JURISDICTION OF COMPETENT AUTHORITIES

The following table shows the subject-matter jurisdiction of the Competent Authorities in each of the countries in which we operate.

	ARGENTINA	BRAZIL	COLOMBIA	COSTA RICA	CHILE	ECUADOR	EL SALVADOR	GUATEMALA	HONDURAS	MEXICO	NICARAGUA	PERU	PUERTO RICO	PARAGUAY	DOMINICAN REPUBLIC	URUGUAY
Confidentiality	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
Service Restriction Orders	YES	YES	YES	YES	YES	YES	YES	YES	NOD	YES	NO	YES	YES	YES	YES	YES
Requisition	YES	YES	NO	NO	NO	YES	NO	NO	NOD	YES	YES	YES	NO	YES	YES	NO
Repossession of frequencies	YES	YES	YES	YES	NO	YES	YES	NO	YES	YES	YES	YES	NO	YES	YES	YES
Restriction of network access in prisons	NO	YES	YES	YES	NO ^A	NO ^B	YES	NO	YES	YES	NO ^A	YES	NO	NO	NO	YES
Discontinuance of services as a result of tampering with the normal operation of a telecommunications network	NO	YES	NO	YES	NO	YESc	YES	NO	NO	YES	YES	YES	YES	NO	YES	NO
Reassignment of frequencies and public telecommunication networks	NO	YES	YES	YES	NO	YES	YES	NO	NO	YES	YES	NO	YES	NO	YES	NO
Limitation of unrestricted-use rights	NO	YES	YES	YES	NO	NO	YES	NO	NO	NOD	NO	NO	NO	NO	YES	YES
Domain blocking	YES	YES	YES	NO	NO	YES	NO	NO	NO	NOD	NO	YES	NO	NO	YES	YES
Intervention of the IT and communication sectors	NO	YES	YES	YES	NO	NO ^B	NO	NO	YES	YES	YES	YES	NO	NO	YES	YES
Emergencies, commotions or calamities	NO	YES	YES	YES	NO	YES	NO	NO	NO	NOD	NO	YES	NO	YES	YES	YES
Content blocking	NO	NO	YES	NO	YES	YES	NO	NO	NO	NOD	NO	YES	NO	NO	YES	YES
Revocation of concessions	NO	YES	NO	YES	NO	YES ^c	NO	NO	YES	YES	YES	YES	NO	NO	YES	YES

^A Unless otherwise determined by a court order.

^B While network access is restricted in prisons as a matter of practice, it is not required by statute.

^c Except as otherwise provided in a presidential declaration of a state of emergency (estado de excepción).

 $^{^{\}mbox{\tiny D}}$ Subject to the terms of the relevant concession agreement.



For the avoidance of doubt, below is a glossary of the terms included in the preceding table.

Confidentiality

Obligation to protect our customers' data and refrain from disclosing any such data (except as required by law). Under the applicable laws, legal entities are required to safeguard their customers' data and to regard such data as strictly private and confidential.

We are permitted to retain anonymized personal data, that is, personal data which has been processed to make it unidentifiable and ensure that is cannot be traced back to a specific individual. Any such information is outside the scope of the laws and regulations relating to the protection of personal data. However, such information shall remain confidential and be safeguarded in accordance with our own policies.

Service Restriction Orders

Directives (commonly known as "SROs") that constitute lawful demands of the Competent Authorities requiring us to take action to prevent or restrict the access to our networks or to the services provided by third parties over such networks, or to block certain specified services, content, URLs or domains.

Telecommunications carriers, either directly or through industry organizations such as the GSMA, have been encouraging government authorities to become more transparent about their role in the discontinuance or restriction of access to telecommunications networks and services, and about their legal arguments in support of the adoption of such measures, in an effort to ensure that any limitation on the right to freedom of expression imposed by the laws of their home countries is based solely and exclusively on security concerns, and that any intervention by such authorities is limited in scope and is carried out in compliance with the international laws and principles on the respect of human rights.

We decry the issuance of SROs which are in violation of the human rights recognized by the International Bill of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, and the Ten Principles of the United Nations Global Compact. However, as a telecommunications carrier we are required to comply with the SROs of the Competent Authorities, including those relating to the imposition of service restrictions.

Requisition¹⁷

The laws of the countries in which we operate authorize the federal governments thereof to effect the requisition of general means of communication, and of the assets, rights and elements required for their operation, in the event of (i) natural disasters, (ii) war, (iii) material disruption of the public order or (iv) imminent danger to the national security, the internal peace of the country or the domestic economy, or to ensure the continuity of service.

¹⁷ Administrative act pursuant to which the federal government assumes temporary control over all or part of a public telecommunications network operated by a private carrier, thereby limiting the ownership rights of such carrier.



Under the aforementioned laws, upon any requisition the personnel assigned to the operation of the relevant network must be made available for the duration of the contingency to an administrator appointed by the federal government. Such administrator would be responsible for ensuring the achievement of the objectives stipulated in the relevant requisition order.

Repossession of Frequencies¹⁸

Under the laws of the countries in which we operate, the federal government may reclaim the radio frequencies that we use under our spectrum concessions (i) for public interest reasons, (ii) for national security reasons at the request of the President, (iii) for purposes of the deployment of new technologies, (iv) to address interference issues, (v) to comply with the international treaties to which the relevant country is a party, (vi) to reconfigure the radioelectric spectrum or (vii) to ensure the continuity of a public service.

In the event of cancellation of a concession following a repossession, the federal government shall provide for the adoption of any and all such measures as may be necessary to ensure the continuity of the services.

Restriction of network access in prisons

Obligation of a telecommunications carrier to restrict the access to its networks and services from within prison facilities in order to preclude the use of mobile devices in furtherance of criminal activities, in the interest of national security.

The Competent Authorities may require telecommunications carriers and other providers of telecommunication services to implement any such procedures and solutions as may be necessary to render commercial wireless services unavailable within the prison system.

Discontinuance of services as a result of tampering with the normal operation of a telecommunications network

Power and authority of a government entity to require a telecommunications carrier to discontinue the provision of services to one or more customers upon the detection of unusual traffic volumes that may impair the operation of a mobile network.

This may occur as a result of the use of non-homologated telecommunication devices that generate abnormal traffic volumes which cannot be controlled by their users.

Reassignment of frequencies and public telecommunication networks

Power and authority of the federal government or the agencies responsible for managing the radioelectric spectrum to require a telecommunications carrier to switch its operations to a different frequency.

¹⁸ Power and authority of the federal government to reclaim any or all of the radio frequencies used by a carrier under spectrum concessions in the events set forth in the applicable laws.



Limitation of unrestricted-use rights

Power and authority of the Competent Authorities to establish unrestricted frequency bands in accordance with the recommendations issued by the International Telecommunication Union (ITU).

In such event, the regulatory agency responsible for managing the radioelectric spectrum in the relevant country will determine which of the frequencies included in such country's Frequency Allocation Chart will constitute unrestricted frequencies. In addition, such agency may determine that the users of certain frequencies will be exempted from the payment of contributions to the social programs established by the government to foster the expansion of network coverage in rural areas.

Domain blocking

Statutory power and authority of the Competent Authorities to require telecommunications operators to block certain specified URLs or domains if such authorities have reason to believe that such URLs or domains are being used in connection with unlawful activities such as the violation of intellectual property rights, the sexual abuse of minors or other activities proscribed by the laws of the relevant country.

Intervention of the IT and communication sectors

Power and authority of the federal government to implement regulations, public policies and actions intended to control the development of the relevant country's IT and communications sectors.

Such powers and authority, which vary from one country to another, may include the establishment of public policy objectives (e.g., the protection of users at large and of children and teenagers), the enactment of regulations governing the provision of specific types of services, the performance of audits and the implementation of actions intended to control the provision, quality, connectivity and other aspects of IT and communication services.

Emergencies, commotions or calamities

Circumstances involving the occurrence of natural disasters at the national, local or regional level in a given country, including earthquakes, floods and other events of force majeure, or events which may pose a risk to the national security of the country in which a telecommunications carrier operates, including wars, armed conflicts and internal turmoil.

Under the laws of the countries in which we operate and the terms of the concessions granted to the telecommunications carriers operating therein, upon the occurrence of a natural disaster or other event of force majeure the Competent Authorities may seek to compel such carriers to devote their attention to the restoration of communication services, to prioritize certain actions or to broadcast information intended to protect human life.



In addition, under the laws of the countries in which we operate, upon the occurrence of an event involving national security concerns the Competent Authorities may seek to compel the cooperation of telecommunications carriers in connection therewith or may take over their operations.

Content blocking

We are permitted to block the access to certain types of content, applications or services in the interest of our customers' privacy and the security of our networks. We may also block the access to specific types of content, applications and online services at the request of a customer, pursuant to an order of a Competent Authority or if the relevant content, application or service is in violation of the applicable laws.

Revocation of concessions

Power and authority of the telecommunications regulators or other Competent Authorities to terminate the concession, license or other similarly-titled agreement with a given telecommunications carrier in the event of violation of the terms of such agreement or upon the occurrence of certain events.

