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### 1. Introduction

América Móvil, S.A.B. de C.V., and its subsidiaries (“América Móvil” or “the Company”) confirm and formalize their commitment with the values and principles of Corporate ethics, transparency and environmental protection. In this sense, this Environmental Policy (the “Policy”) lists the main principles the Company will use to govern its environmental efforts, both internally in all our operations, and across our value chain.

The Company’s subsidiaries are subject to various environmental regulations in the different countries where we operate. A violation of any of such rules in our operations or across our value chain may give rise to different sanctions and have significant reputational impact on our brands.

For this reason, the Company has developed an Integrity and Compliance Program which includes, among other things, its Code of Ethics and this Policy. Any violation of our Code of Ethics, our internal policies and/or applicable laws, rules and regulations applicable to environmental matters, 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 Environmental Policy is to establish environmental principles and guidelines applicable to all our operations, in order to provide a framework and focus the efforts made in the Company’s operations on a daily basis, towards a common goal: to conduct our decision-making processes and our daily operations based on the highest sense of environmental care and responsibility.

### 3. Scope

This Environmental Policy is applicable and mandatory for you and for each and every one of our Employees and Third Parties, in each of the countries where we operate, so it is very important to know, understand and apply all the principles and guidelines contained herein.

### 4. Definitions

**Life cycle analysis.** Methodology used to assess the potential environmental impact of a product, process or activity, throughout its full life cycle, by quantifying the resources, environmental emissions or discharges, as well as the impact on the health of the inhabitants of the ecosystem under assessment.



**Value chain.** Concept that recognizes each stage of the process of elaboration and sale of a product or service as a determinant for its value; from the relationship with raw material suppliers to the way in which the final product is delivered to consumers.

**Offset.** Any action seeking to prevent others from causing an impact equivalent to that expected given the externalities analyzed. Normally, it involves an investment on projects with environmental and social benefits.

**Externality.** The environmental and social effects, positive or negative, of the production and/or use of goods or services and which are not reflected in market prices. Internalizing an externality means to incorporate the cost of minimizing, neutralizing or offsetting that externality into the cost of economic activities.

**Stakeholders.** Any person who is impacted, directly or indirectly, by the operations of América Móvil is a stakeholder.

**Environmental footprint.** This is an indicator of the environmental impact of the activities or operations of an entity that uses existing resources in the planet's ecosystems, as compared to the capacity of the same ecosystem to regenerate these resources.

**Minimization.** Any action designed to reduce considerably, or to a minimum, the impact expected from all externalities analyzed.

**Neutralization.** Any action designed to eliminate the impact expected of all externalities analyzed by a contrary action to counteract it.

**Mitigation Plan.** A guide to implement a series of actions seeking to minimize, neutralize or offset the expected impact of all externalities analyzed.

**Thermovalorization.** When the caloric capacity of a product can be used as its main attribute.

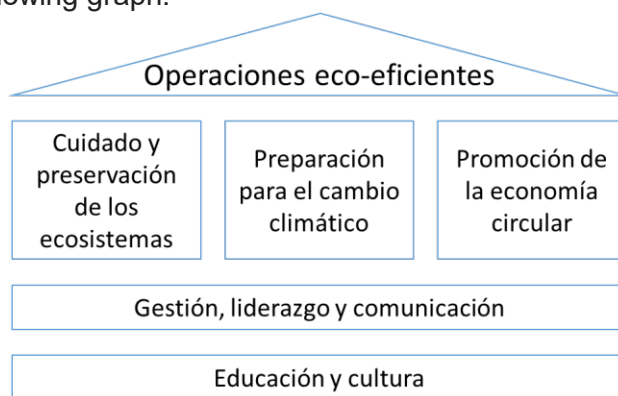
## 5. General Guidelines

The Sustainability purpose of América Móvil is to offer better opportunities for the future through connectivity and empowering people to foster innovation, both within the Company and across our value chain, to ensure that we are eco-efficient. That is, we operate in the most environmentally friendly way possible.



To achieve this, our strategy has two main axes: 1) minimizing the environmental footprint of our operations, services and products throughout their life cycle, and 2) offset our environmental externalities so that the Company's environmental footprint gets closer to zero.

In addition, all procedures and decision-making processes will be focused on these three fundamental fronts: (i) the protection and preservation of ecosystems; (ii) climate change preparedness, and (iii) promoting the circular economy, which are interrelated, as shown in the following graph:



This policy is based on the education and culture of all stakeholders related to the Company's environmental footprint, the development of robust environmental management systems with clear and ambitious goals in the short, medium and long term; as well as on compliance with the rules and regulations applicable to each operation.

All the components and commitments of this policy are detailed below.

### 5.1 Protection and Preservation of Ecosystems

At América Móvil we will always strive to make our operations as environmentally friendly as possible. For this reason, we constantly analyze the Company's environmental externalities, in order to find options to minimize, neutralize and / or offset them.

These analyses include, among other things: minimizing the use of drinking water and maximizing the use of treated water; treating the wastewater of our operations on site or through third parties; minimizing the generation of urban and hazardous waste, and always ensuring their proper disposal in accordance with applicable laws in each region; power efficiency and maximization of renewable energies; and the preservation of biodiversity.



Any operation that could end up having a negative externality on the ecosystem of a neighboring community must be discussed in consultation with the representatives of said community, in order to agree on appropriate mitigation plans, as well as to monitor their implementation.

### **5.2 Climate Change Preparedness**

The physical, social and legislative impacts associated with climate change pose challenges that we must face, as a company and as society. This pillar has two lines of action:

#### **Mitigation**

- Derived from the efficiency programs mentioned in the previous pillar, at América Móvil we have pledged to reduce our carbon footprint to the minimum economically viable value. América Móvil is willing to adhere to initiatives seeking to limit the rise in global average temperature through mitigation strategies adopted by companies.
- We have also made efforts to minimize the use of chemicals, gases, products or processes that may have negative impacts on global warming, and we constantly evaluate the use of more environmentally-friendly alternatives.

#### **Adaptation**

- At América Móvil we constantly model risk scenarios associated with the adverse effects that climate change could have on the business. These models are run at least once a year and the risks associated with them are analyzed and assessed. The assessment of social, environmental and economic components determine the priority risks for the Company to manage. Likewise, the financial impacts associated with such risks are determined, and strategies designed to manage them.
- Risk management and valuation exercises also allow us to detect business or social responsibility opportunities derived from these climate change models. These opportunities are also assessed to take advantage of them.

Climate change mitigation and adaptation plans are submitted, as required, to the officers that, given their functions, must be involved, as well as to the Company's Board of Directors, for their evaluation, comments and approval. Once approved, the Corporate Sustainability Committee implements exactly the work plans presented, as well as the key performance indicators associated with them, and periodically reports them to the Board of Directors of América Móvil.



All material and emerging climate change-related risks that may potentially have an adverse impact on América Móvil's operations, even local, will be integrated into corporate risk management and assessment processes, so that such risks or opportunities are incorporated into the Company's corporate strategy.

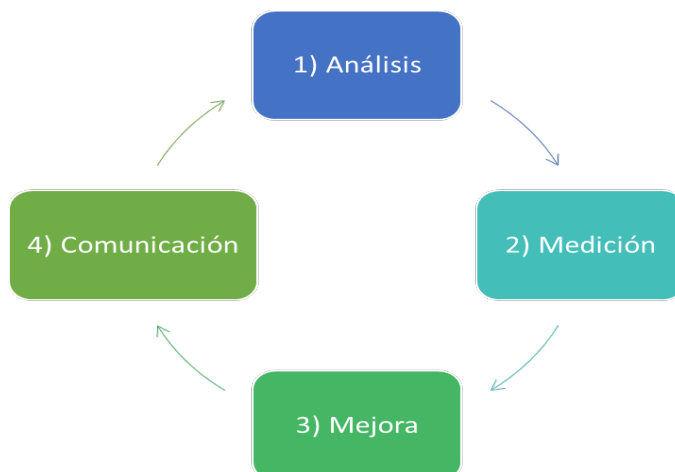
### 5.3 Promoting the Circular Economy

At the Company we promote, whenever possible, circular economy schemes, as this model is essential to achieve the goals of our two previous pillars. The main component of this pillar is the minimization of the footprint across our value chain, through the following actions:

- **Redesign.** Whenever possible, the Company and our suppliers will favor product and process designs that reduce non-recoverable waste, minimizing single-use materials and maximizing the incorporation of recycled materials.
- **Reuse.** We should privilege the reuse of equipment, even over recycling, if in the life-cycle analysis of the product it is shown that the former is more environmentally friendly than the latter.
- **Recycling.** We actively promote recycling of the products we offer. Customer Service Centers are natural collection points, where we promote shared responsibility among our suppliers and clients, joining efforts with our value chain to profitably promote the circular economy.
- **Offset.** Promoting recycling events or creating synergies to support waste collection, through partnerships or foundations, are options to offset waste that cannot be recycled, composted or treated thermally. We intend to achieve zero waste.

### 5.4 Management, Leadership and Communications.

This policy's strategy to minimize our environmental footprint relies on the principles of performance management and continuous improvement, as shown below, based on four fundamental steps:



- 1) **Analysis.** We define key indicators or elements for the three pillars of the strategy, so that goals and continuous improvement programs can be established in all our operations. The environmental analysis of products or processes must be based on their full life cycle, that is, from primary extraction to final disposal of products or processes associated with our services. To achieve this, we should also consider risk analysis and environmental externalities for the Company's material issues.
- 2) **Measurement.** Our operations must establish baselines to set goals, as well as to manage and communicate progress.
- 3) **Improvement.** This policy is based on continuous improvement. We will always seek to favor processes with the lowest environmental footprint, the greatest social benefit and the highest profit margins possible.
- 4) **Communication.** América Móvil reports ethically and transparently its performance on environmental issues, at least once a year, and more often at the request of particular stakeholders. The Company's communication strategy is based on the MRV principles, which stand for: measurable, reportable and verifiable.

In this sense, those operations that in the Analysis phase are identified as potential causes of considerable impact to the environment, will require the implementation of an environmental management system to minimize the possible impacts of their operations. The respective environmental management system will be based on the potential impacts identified during the Analysis phase, that is, if the most severe impact is energy consumption at a site, the management system will focus on this issue as a priority.



### 5.5 Value Chain

We at América Móvil apply this policy beyond our operations, as it is our responsibility to oversee that the Company's value chain, especially our suppliers, also have environmental policies at least at the same level of commitment and depth as ours.

América Móvil expects its suppliers to have a similar commitment towards the environment to that of our Company and its value chain, especially in its suppliers, both direct and indirect.

We must constantly assess our direct suppliers, to identify those that can have a huge impact on the environment. We will require a stronger commitment to environmental management depending on the potential impact of their business, as shown in the table below.

Supplier's environmental impact level	Requirements to become a supplier of América Móvil
Zero to minimum	<ul style="list-style-type: none"><li>• To have an environmental policy that covers at least the same points as this policy.</li></ul>
Medium	<ul style="list-style-type: none"><li>• All the points listed above.</li><li>• An annual environmental performance management report.</li></ul>
Above average	<ul style="list-style-type: none"><li>• All the points listed above.</li><li>• To have an internationally recognized environmental management system.</li></ul>

### 5.6 Transparency and Accountability

Our stakeholders, including the community, investors, consumers and corporate clients, are increasingly interested in the environmental impact of the companies they buy products and services from. For this reason, beyond legal compliance, at América Móvil we have pledged to develop and report every year reliable indicators for the environmental performance of all our operations.

For América Móvil, environmental performance reports are as important as financial information reports, that is, they must be clear, transparent, truthful and accurate, and supported by evidence. Because this information is included in public documents that our investors, consumers and corporate clients review for decision-making purposes.





Therefore, it is our responsibility to periodically and accurately update the information management system, in accordance with our principles of honesty and transparency. As with financial information, any activity seeking to alter, forge, destroy, conceal or modify environmental accounting records is expressly prohibited.

### **6. Prevention**

To prevent any environmental risk, our commitments as a Company, and yours as an Employee of América Móvil or as a Third Party, include:

- i. Adhere to our Code of Ethics, this Environmental Policy and other applicable policies of the Company, as well as applicable local environmental legislation in each of the countries where we operate.
- ii. Always consider risk analysis and environmental externalities in decision-making, including options to minimize, neutralize and/or offset environmental impacts.
- iii. Promote the adoption of practices that favor processes with the lowest environmental footprint, the greatest social benefit and the highest profit margin possible.
- iv. Minimize the environmental footprint across our value chain, demanding that our suppliers have environmental policies at least at the same level of commitment and depth as ours, and that they monitor compliance with such environmental standards across their own value chain.
- v. Comply with all environmental information requirements applicable to the Company, as information is available publicly (like the company's financial indicators) to clients, investors and regulators, so any omission, misinformation or lack of transparency in our indicators is strictly prohibited.
- vi. Conduct all negotiations, purchases and transactions strictly adhering to our internal policies and procedures, keeping all records thereof for inspection in the event of any audit.
- vii. Adopt internal controls and report, if necessary, to the Whistleblower Portal and/or the corresponding authorities, any Employee or Third Party that commits an act in violation of the Company's Code of Ethics, this Environmental Policy or the law.



### **7. Assessment, Oversight, Verification and Compliance Audit of the Environmental Policy.**

The Compliance Officer, along with the Corporate Sustainability Department, will be in charge of overseeing, monitoring and, where appropriate, conducting audits to ensure proper compliance with the provisions established in this Environmental Policy, and will periodically assess its effectiveness and make any necessary updates for optimal operation.

The Sustainability area is also responsible for periodically assessing the sustainability strategy, including, among other things, a series of measures seeking to prevent environmental risks in our operations and across our supply chain.

If any audits are necessary, they will be conducted regularly and in randomly selected 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 we all must comply and ensure compliance with this Policy and report any act contrary to it, through the Whistleblower Portal <https://denuncias.americamovil.com/>.

### **8. Training and Dissemination**

As mentioned at the beginning of the document, this policy is based on the effective training of all the Company's stakeholders and is designed to achieve a cultural change towards the respect and protection of the environment. For this reason, América Móvil will offer its Employees and Third Parties online or in-person courses, which will be advertised through the official means of communication of the Company, in order to train them to understand the Company's concepts, scope and best practices. It is our responsibility to participate in the allocated sessions, as well as to respect the requested times and assessments.

In addition, we provide an email for questions and concerns regarding this policy that may arise in your day-to-day activities: [contacto-rse@americamovil.com](mailto:contacto-rse@americamovil.com).

### **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 applicable internal workplace regulations and/or laws, rules and regulations.



Within América Móvil, the Ethics Committee of each subsidiary will be the authority of last resort to determine sanctions in the event of default of this Policy, irrespective of such defaults being also sanctioned by applicable laws and authorities having jurisdiction.

### **10. Whistleblower Portal**

To report any breach of this Environmental Policy or our Code of Ethics, our Whistleblower Portal is available at: <https://denuncias.americamovil.com>.

You, like each and every one of América Móvil's Employees and Third Parties, have the right and the obligation to report to your line manager, the Compliance Officer or directly through the Whistleblower Portal, any behavior that infringes this Code of Ethics or any applicable internal law, regulation, policy or procedure and, in general, any non-ethical conduct.

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 failure to report a serious breach of ethics can have disciplinary consequences for you, since you may be concealing an unethical or criminal act. 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.

América Móvil has taken all the reasonable and justified measures to protect the confidentiality of the complaint and the complainant, as well as to guarantee that there will be no retaliation against you for reporting. No provision in this Code shall be understood to discourage individuals from filing complaints directly with authorities having competent jurisdiction. In such cases, our suggestion is that it should be reported to Legal, so that they can cooperate with the authorities, if necessary.

All complaints 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.