



Environmental Policy

América Móvil

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1. Introduction

América Móvil, S.A.B. de C.V. and its Subsidiaries (hereinafter, “América Móvil” or the “Company”) wish to ratify and formalize their commitment with the prevention of environmental risks and impacts associated with their operations in their respective jurisdictions. Accordingly, this Environmental Policy (hereinafter, the “Policy”) reaffirms the core principles that guide our environmental efforts as they relate to our own operations and all other operations within our value chain.

We are subject to a number of environmental laws and regulations in each of the countries in which we operate. The violation of such laws and regulations as a result of our operations or any other operations within our value chain may give rise to various types of penalties and could result in material damages to our reputation and trademarks.

Based upon the above, we have developed an Integrity and Compliance Program that includes, among other things, our Code of Ethics and this Policy. The violation of our Code of Ethics, internal policies and/or the applicable environmental laws and regulations may result in civil and criminal penalties ranging from monetary fines to imprisonment for both the Company and the responsible individual.

2. Purpose

The purpose of this Policy is to affirm the principles and guidelines that govern our environmental endeavors and to establish a regulatory framework that ensures that all of our efforts in our day-to-day operations are aimed at achieving a common goal: conducting our decision-making processes and our day-to-day operations in accordance with the greatest sense of responsibility for the environment and its protection.

3. Scope

This 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

Life-cycle analysis: A methodology for assessing the potential environmental impacts of a product, process, service or activity throughout its full life cycle by quantifying its material inputs, the corresponding discharges or emissions to the environment and the effects thereof on the health of those who live in the relevant ecosystem.

Value chain: The series of steps that go into the creation, distribution and sale of a product or service (i.e., from a company’s relationships with its suppliers of raw materials to the means through which the finished product is delivered to the consumer), taken as a whole for purposes of the valorization of such product or service.



Compensation: Any action intended to prevent others from causing an environmental impact equal to the anticipated impact of the assessed externalities. Typically, it entails an investment in projects that produce environmental and social benefits.

Externality: Any positive or negative environmental or social effect of the production, distribution and/or consumption of goods or services which is not reflected in the market price thereof. Internalization of externalities refers to the incorporation of the cost of minimizing, neutralizing or compensating the impact of an externality into the cost of the economic activity.

Stakeholder: Any person affected, directly or indirectly, by América Móvil's operations.

Environmental footprint: An indicator of the environmental impact of the activities or operations of an entity that involve the use of our planet's ecological resources *vis a vis* the relevant ecosystem's ability to replenish such resources.

Minimization: Any action intended to minimize or significantly reduce the anticipated impact of the assessed externalities.

Neutralization: Any action intended to offset the anticipated impact of the assessed externalities through an action which is the opposite of that which it seeks to offset.

Mitigation plan: A set of guidelines for the implementation of a series of measures intended to minimize, neutralize or compensate the anticipated impact of the assessed externalities.

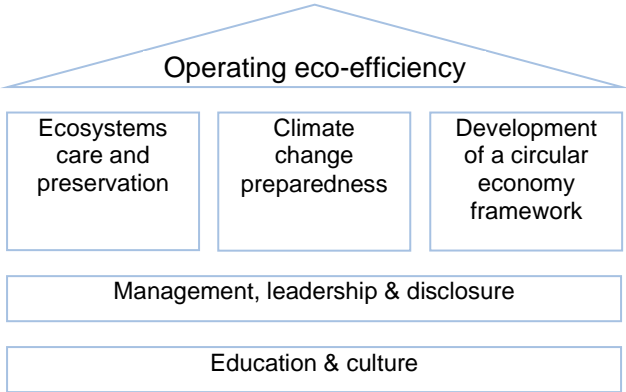
Thermo-valorization: The definition of the primary attribute of a product by reference to its heat capacity.

5. General Guidelines

América Móvil's sustainability goals include the generation of better opportunities for the future through increased connectivity and individual empowerment, as well as fostering innovation within the Company and throughout its value chain as a means for ensuring our operating eco-efficiency, i.e., that our operations are conducted in the most environmentally friendly manner.

To achieve the aforementioned goals, we have developed a two-pronged strategy: (1) minimizing the environmental footprint of our operations, services and products throughout their life cycles and (2) compensating our environmental externalities to bring our environmental footprint ever-closer to zero.

All of our decision-making and other processes must take into account three key considerations: (i) ecosystems care and preservation, (ii) climate change preparedness and (iii) development of a circular economy framework. The following chart illustrates the correlations among these considerations.



This Policy is aimed at furthering the education and culture of our stakeholders as with respect to our environmental footprint, developing robust environmental management systems, establishing clear and ambitious short-, medium- and long-terms goals and ensuring our ongoing compliance with the laws and regulations that are applicable to our various operations.

Below is a detailed description of the components of and commitments encompassed in this Policy.

5.1 Ecosystems Care and Preservation

At América Móvil, we will always strive to ensure that our operations are as environmentally friendly as they could possibly be. To this end, we assess our environmental externalities on a regular basis to identify opportunities for their minimization, neutralization and/or compensation.

The aforementioned assessments are focused on minimizing the use of potable and maximizing the use of treated water, treating the water discharges generated by our operations either on-site or through third parties, minimizing the generation of urban and hazardous waste and disposing of such waste in accordance with the applicable laws of the relevant jurisdiction, improving our energy efficiency, maximizing the use of renewable energies and preserving the biodiversity, among other things.

Any operation which has the potential for creating a negative externality on the ecosystem of a neighboring community is submitted to consultation with community representatives in order to agree upon an adequate mitigation plan to minimize any impact on the ecosystem and, where applicable, upon any remediation actions and the process for ensuring their implementation according to schedule.

5.2 Climate Change Preparedness

The physical, social and regulatory effects of climate change present our Company and the society at large with a number of challenges that demand our attention. We have devised two courses of action to address these challenges:



Mitigation

- Consistent with the efficiency programs described above, at América Móvil we are committed to the reduction of our carbon footprint to the economically-viable minimum. We intend to adhere to initiatives that are aimed at curbing the increase in the average global temperature through corporate mitigation strategies.
- In addition, we have engaged in efforts to reduce to a minimum our use of chemical and other products, gases or processes that may have a negative effect on global warming, and we endeavor to assess on an ongoing basis the use of more environmentally friendly alternatives.

Adaptation

- At América Móvil, we model risk scenarios relating to the potential adverse effects of climate change on our business. This risk modeling is performed at least once a year and is followed by an analysis of the relevant risks for assessment purposes. All risks are assessed from a social, environmental and economic perspective to establish priorities for purposes of the management of our operations. We also identify the financial impacts of such risks and devise strategies for their management.
- Our risk assessment and management processes also allow us to identify business and social responsibility opportunities associated with our climate change models. This opportunities are further assessed to determine the best course for taking advantage of them.

Where appropriate, our climate change mitigation and adaptation plans are submitted for assessment, comments and approval to those officers whose input is warranted in view of their respective duties, and to our Board of Directors. Once approved, our Corporate Sustainability Committee closely monitors the implementation of such plans and the key performance indicators associated therewith, and submits reports thereon to América Móvil's Board of Directors on a regular basis.

All the material and emerging risks relating to climate change that may have a potential adverse effect on our operations, including at the local level, are incorporated into our centralized risk assessment and management processes in order to ensure that such risks and the associated opportunities are further incorporated into our corporate strategy.

In addition, we engage through industry associations in public policy debates concerning the global mitigation of climate change, encouraging the adoption of policies which are aimed at achieving increased investments in clean technology solutions. We have implemented an integrated system for managing our memberships and engagements with industry associations in an effective manner. One of the core elements of this system is the establishment of a solid governance framework to ensure that we conduct ourselves at all times in a transparent and responsible manner in connection with our engagements with industry associations at every level of our organization, including our senior management.



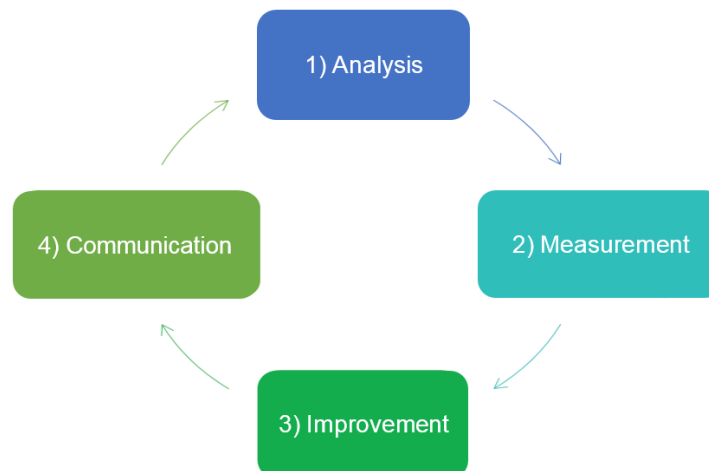
5.3 Development of a Circular Economy Framework

At América Móvil, we favor the adoption of circular economy frameworks where possible, based on our conviction that the development of a circular economy is critical to the success of the two preceding components. The foregoing component is primarily aimed at minimizing the footprint of our entire value chain through the following actions:

- **Redesign.** Wherever possible, we and our suppliers must favor product designs and processes which do not generate non-valorizable waste and must strive to minimize our reliance on single-use items and maximize the use of recycled materials. We must also favor reuse over recycling when it comes to our equipment if the life-cycle analysis of the relevant item indicates that the former constitutes a more environmentally friendly option than the latter.
- **Recycling.** We must actively encourage the recycling of the products we offer. Our customer service centers serve as natural collection points and we must use them to promote our and our suppliers' shared responsibility and join the efforts of our value chain in fostering a circular economy in the most cost-effective manner.
- **Compensation.** We must support, through alliances or foundations, the organization of recycling events and the creation of synergies conducive to the collection of waste, both of which constitute compensation options for waste which was not properly recycled, thermo-valorized or composted. This means that we are taking a zero-waste approach.

5.4 Management, Leadership and Disclosure

Our strategy for minimizing our environmental footprint under this Policy is based on four core principles of performance management and ongoing improvement:



- 1) **Analysis.** We have defined the key elements or indicators of the three courses of action involved in our strategy in order to enable each of our operations to establish ongoing improvement objectives and programs. The analysis of any product or process associated with our services for environmental purposes must encompass the full life



cycle of the relevant product or process, that is, from the extraction of the raw materials to the final disposition of such product or the completion of such process, and must include an assessment of all material environmental risks and externalities.

- 2) **Measurement.** Our operations must establish risk and externality baselines as a basis for the definition of their objectives and for progress reporting purposes.
- 3) **Improvement.** This Policy is aimed at improving our performance on an ongoing basis by favoring the use of processes that have the lowest environmental footprint, yield the most social benefits and are more cost-efficient.
- 4) **Disclosure.** Consistent with our ethical and transparency principles, we publish an environmental performance report at least once a year and may do so more frequently at the request of any given group of our stakeholders. Our information disclosure strategy is based on the MRV (measurability, reportability and verifiability) criteria.

Any operation which is found during the analysis stage to have a potential material impact on the environment will be required to institute an environmental management system to minimize such impact. Any such system shall focus on the potential impacts identified during the analysis stage. For example, if the most significant impact relates to our energy usage at a given site, the system will be aimed primarily at addressing that issue.

5.5 Value Chain

In addition to the application of the foregoing Policy to its own operations, América Móvil is responsible for ensuring that each of its value chain partners, including, in particular, its suppliers, has adopted an environmental policy which is no less comprehensive than this Policy.

América Móvil expects each of its value chain partners, including, in particular, its direct and indirect suppliers, to commit itself to the protection of the environment to a similar extent as América Móvil.

We must perform regular assessments of our direct suppliers in order to identify those who may have a material impact on the environment. We will require any supplier whose operations may have a potential impact on the environment to expand the scope of its environmental management initiatives in accordance with the following table:



Environmental impact	Requirements
None to low	<ul style="list-style-type: none">• An environmental policy which is no less comprehensive than the foregoing Policy.
Average	<ul style="list-style-type: none">• The requirements set forth in the preceding item.• An annual environmental performance report.
Above average	<ul style="list-style-type: none">• The requirements set forth in the preceding items.• An internationally recognized environmental management system.

5.6 Transparency; Reporting

Our various stakeholders, including the members of our communities and our investors, consumers and corporate clients, have been paying increased attention to the environmental impacts generated by the entities from whom they purchase goods and services. As a result, in addition to our statutory obligations we have undertaken to develop and publish on annual basis reliable indicators of the environmental performance of each of our operations.

We include this information in the documents and information that we make available to the public, which are relied on by our investors, consumers and corporate client in connection with their own decision-making processes. Accordingly, in preparing our environmental performance reports we employ the same degree of care and apply the same standards as to clarity, transparency, truthfulness and accuracy that we employ and apply in the preparation of our financial information.

To ensure the above and consistent with our honesty and transparency principles, we are required to enter accurate information into our information management systems on a regular basis. As in the case of our financial information, the alteration, falsification, destruction, concealment or modification of our environmental performance information is strictly prohibited.

6. Prevention

For purposes of the prevention of any environmental risk, 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, the foregoing Policy and our other policies, and the applicable environmental laws of each of the countries in which we operate;
- ii. Take into consideration, in connection with any decision-making process, the assessment of our environmental risks and externalities, including any available options for the minimization, neutralization and/or compensation of our environmental impacts;
- iii. Foster the adoption of practices that favor the use of processes that have the lowest environmental footprint, yield the most social benefits and are more cost-efficient;
- iv. Minimize the footprint of our entire value chain by requiring that our suppliers adopt environmental policies which are no less comprehensive than ours, and monitor the environmental performance of our value chain partners;



- v. Comply with the environmental performance disclosure requirements to which we are subject as a public company and refrain from including in our environmental performance reports any information which is false or lacking in terms of transparency, or from omitting to include any material information in such reports.
- vi. Conduct all negotiations and execute all procurement and other transactions in accordance with our internal policies and procedures, and maintain all records thereof available for review in the event of an audit; and
- vii. Implement internal controls and, where necessary, report through our Complaints Portal and/or to the competent authorities any conduct by any Employee or Third Party which is in violation of our Code of Ethics, the foregoing Policy or the law.

7. Environmental Compliance Assessment, Oversight, Verification and Auditing

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

Our Corporate Sustainability Department is also responsible for assessing on a regular basis our sustainability strategy, which includes, among other things, a series of guidelines intended to prevent us from incurring environmental risks in connection with our operations and our supply chain.

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 Policy and to report any conduct which is violation thereof through our Complaints Portal, <https://denuncias.americamovil.com/>.

8. Training

As mentioned early on in this document, the foregoing Policy is aimed at furthering the education of all of our stakeholders as a basis for the achievement of a cultural change toward an increased respect for and protection of the environment. América Móvil offers to its Employees and to Third Parties online and in person training courses to better enable them to understand specific concepts, scopes and practices. 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.



Should you have any question or concern with respect to our day-to-day operations, do not hesitate to contact us via email at contacto-rse@americamovil.com.

9. Penalties

The violation of this 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 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 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.