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# Anticorruption Policy

## América Móvil

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### 1. Introduction

América Móvil, S.A.B. de C.V., its Subsidiaries and affiliates (“América Móvil” or the “Company”), confirm their commitment to the values and ethical principles of the Company, and hereby express that they will make their best efforts to combat corruption and illegal practices by implementing this Policy.

The legal framework applicable to anti-corruption matters in Mexico is under the authority of the National Anti-Corruption System, mainly governed by the General Administrative Responsibilities Act; there are also international regulations such as the *Foreign Corrupt Practices Act* or “FCPA” (a law applicable to corrupt practices outside the United States), the principles of the World Pact of the United Nations and other anti-corruption provisions included in international treaties, as well as laws of different countries applicable to our Company.

América Móvil has developed an Integrity and Compliance Program which includes, among other things, its Code of Ethics and this Anti-Corruption Policy, to prevent and fight Corruption. Any breach of our Code of Ethics, our internal policies or applicable anti-corruption laws, rules and regulations, even if the respective action or operation happens outside of Mexico, may lead to civil and criminal penalties ranging from fines to imprisonment being imposed on individuals and the Company.

### 2. Purpose

The objective of this Policy is to establish anti-corruption principles and guidelines to implement a proper and efficient prevention, control, surveillance and audit system, so that the Company can guarantee that any activity performed by it or on its behalf complies with our Code of Ethics, this Policy and applicable laws, rules and regulations.

This Policy outlines the behaviors and activities that, as Employees and/or Third Parties, we should follow in our interactions with Civil Servants, Government Entities and Third Parties in order to protect the Company, its Employees, shareholders and Third Parties from possible breaches of our Code of Ethics, internal policies and/or to any applicable laws.

### 3. Scope

This Policy is applicable and mandatory to you and all our Employees and Third Parties, in every country where we operate; therefore, it is important to know, understand and put into practice the principles and values contained herein.



#### 4. Definitions

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

**Collusion:** This means a form of Corruption that consists of a secret agreement between two or more parties to deceive or defraud a person or public or private entity in order to achieve an illegal goal. Collusion is also deemed to exist when one or more individuals take part in actions that involve or are aimed at or have the effect of obtaining undue benefits or advantages.

**Competitor:** Any company that participates in the same or a similar business sector to that of América Móvil and its Subsidiaries.

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

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

**Political Contributions:** Contributions in cash or in kind made to support political parties, officials of political parties, or candidates for elected positions.

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

**Things of Value:** Any kind of payment in cash or in kind, including without limitation the following: cash or cash equivalents (securities, grocery coupons, gift certificates, electronic wallets, etc.), loans, gifts, rewards, meals and drinks, travels, Entertainment Expenses, Hospitality, plane tickets, discounts in the price of goods or services, invitations to travel, clothing, jewelry, job offers or promises of employment, either personal or for Third Parties, any kind of concession in a Contract, product or service, as well as the possibility or agreement to acquire shares of the company or its related parties.

**Due Diligence:** Background check of a Company or individual, prior to establishing commercial relationships and/or signing a Contract, to identify potential legal, financial, Corruption, money laundering or reputational risks.

**Donation:** An act whereby a company (Donor) transfers, with no cost to a private corporation, a public entity or a non-profit organization, money, goods or services of their

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own (Donation), and the other party accepts (Donee) them to be used for (i) public or social welfare; (ii) scientific purposes; (iii) health; and/or other similar not-for-profit, nor political or entertainment purposes; and without exchanging any payment or retribution in favor of the company or any individual.

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

**Concealment:** This is a form of Corruption that prevents or hinders the detection of criminal activities.

**Relative(s):** Blood relatives up to the third degree. That is, sons, daughters, spouses, father, mother, grandparents, uncles/ aunts, nieces, nephews, grandchildren and cousins will be deemed close relatives.

**Fraud:** This is a form of Corruption committed by anyone who, deceiving or taking advantage of the error of a person, illegally takes possession of a thing or gains an undue profit.

**Occupational Fraud:** This is the intentional use by an Employee of his/her job position for personal gain or that of a Third Party as a result of unduly using and taking advantage of the resources or assets of the Company.

**Entertainment Expenses:** Sports, musical or cultural events such as tournaments, fairs, theater plays or concerts, among others.

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

**Hospitality:** Expenses with the purpose of strengthening a business relationship (payment of flights, transportation, hotels, business meals, courses, conferences, congresses or seminars, among others) with Third Parties or Civil Servants.

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

**Subsidiary's Compliance Officer:** This means the department in the Subsidiary responsible for implementing, disseminating and overseeing observance of the Integrity and Compliance Program, according to the criteria, indications and assessments of the Compliance Officer of América Móvil.

**Facilitation Payment:** This is a form of Corruption that consists of a payment made to a Civil Servant in order to expedite or ensure the result of certain process (license paperwork, operation permit, visas, among others).

**Individual(s):** This means any person other than a Civil Servant.

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**Sponsorship:** Support in cash or in kind for meetings, events, conventions or activities in exchange for a commercial benefit in order to promote the brand and/or as an advertising strategy under an agreement executed by the parties.

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

**Free Product:** This means products that are offered to a customer for delivery without good and valuable consideration, as part of an ongoing sales transaction, and which are similar to the sold products.

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

**Gift:** Any Thing of Value or benefit delivered to a person as a sign of attention, esteem or friendship (Christmas gifts, promotional merchandise, among others).

**Risk:** This means the likelihood of a negative event and its negative consequences or impact, the existence of which represents a threat (source of danger) and makes the Company vulnerable to its effects.

**Civil Servant (domestic/foreign):** This is a person who holds a government position or is an Employee at a Government Body or any other decentralized government office, either by election or appointment, and may represent any level of the , federal, national, state or municipal Government including, without limitation, the congress, ministries, judicial bodies, research agencies and organizations. It also includes members of political parties or candidates to any position in elections.

Officers in public international organizations are also deemed Civil Servants (World Bank, United Nations, International Monetary Fund).

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

**Subsidiary:** Any entity controlled by América Móvil.

**Third Party(Parties):** Distributors, representatives, consultants, commercial partners,



agents, brokers, customers, contractors, managers, lobbyists, advisors or suppliers who are part of the value chain of América Móvil or represent the Company in an interaction with another Third Party, a Government or Civil Servants. This includes organizations of the civil society and the education, charitable, cultural or sports institutions.

**Influence Peddling:** This is a form of Corruption that arises when an Employee induces an authority or individual to use his/her influence, economic or political power, either real or fictitious, over a Civil Servant or individual in order to obtain for itself, or for a Third Party, a benefit or advantage, or to cause harm to a person or to the public service.

### 5. General Guidelines

For purposes of this Policy, Corruption acts shall include all kinds of illegal or unethical actions or omissions, for example:

- Fraud
- Occupational Fraud
- Conflict of Interest
- Collusion
- Concealment
- Bribery
- Influence Peddling and
- Facilitation Payments (among others).

Not only if a Civil Servant is involved, but also in the case of Individuals, if these acts are committed by an Employee or a Third Party.

The actions mentioned above are forbidden and may be misdemeanors or felonies, irrespective of Civil Servants being involved or not, of a benefit being obtained or not, and of the effect produced.



This Policy governs all activities where, due to the nature of its operations, América Móvil needs to interact with Third Parties and/or Civil Servants and Government Entities directly or through Third Parties, in any area within its authority. Such activities include:

- Interaction with Public Officials or Governmental Entities
- Permits and Licenses
- Facilitation Payments
- Inspections or verifications by Authorities
- Public Tenders, Invitations or Direct Awards
- Gifts, Entertainment Expenses and Hospitality
- Free Product
- Sponsorships and Donations
- Conflicts of Interest
- Third-Party Due Diligence
- Pre-Employment Due Diligence
- Employing Civil Servants
- Mergers and Acquisitions
- Company Vehicles
- Appropriate Accounting Records

### **5.1. Interaction with Civil Servants or Government Entities**

In the different sectors that América Móvil operates, interactions with Civil Servants are common, for example: issuance of permits and licenses, tenders and direct awards, sales to the Government, among others.

The Company acknowledges that Employees and Third Parties, when performing their duties, may get to be in contact with Civil Servants in any area under their authority. However, such interactions should have as their sole goal the negotiation or discussion of issues regarding our operation, and they should be conducted pursuant to Anti-Corruption laws in effect in the countries where we operate and in accordance with the guidelines of this Policy.

Accordingly, all interactions with Civil Servants or Government Entities must be carried out openly and transparently, and be documented appropriately and subject to the following guidelines:

- The Employees and/or Third Parties in charge of the negotiation will only meet at the offices of the respective Government Entity or at the Company's offices. Meetings in private places, restaurants, clubs or any other place that may be deemed a Corruption act should be avoided.
- At least two people from the Company should be present in all the meetings.



- All communications must be sent using the Company's institutional email and to institutional email addresses of the authority for purposes of transparency. If the initial approach, prospect or communication is by phone or by some other informal means, the agreement or negotiation shall be formalized and documented via the institutional email address.
- All meetings with a Civil Servant should be documented in internal minutes, recording the objective, the attendees and the points discussed. Such minutes must be signed off and duly executed by the Deputy Director or the Director of the area responsible for the negotiation, and submitted to the Subsidiary's Compliance Officer.

### **5.2. Permits and Licenses**

Any type of license and/or permit necessary for the normal functioning and operation of the Company (for vehicles, construction work, operations, etc.) must be obtained strictly in accordance with applicable laws, rules and regulations, and official procedures; our actions shall always be legal and transparent.

If Employees need to meet with Civil Servants to discuss matters related to obtaining such permits and licenses, those meetings must be held according to provisions in the previous paragraph.

If any meals need to be arranged with Civil Servants, provisions in América Móvil's Gifts, Entertainment and Hospitality Policy must be followed at all times.

If a Third Party is hired to handle the paperwork for a permit or license of any kind, the respective agreement shall meet the guidelines of the applicable Procurement Policy and the Third-Party Due Diligence Protocol.

Any Third Party providing a service to América Móvil and representing it before Government Entities to obtain permits and licenses shall have, among other things, a Contract containing its agreement to comply with applicable anti-corruption laws, and to adhere to the Code of Ethics and policies of América Móvil.

### **5.3. Facilitation Payments**

In some jurisdictions, anti-corruption laws describe Facilitation Payments as a means commonly used in certain countries to expedite Government paperwork; however, at América Móvil this activity is considered bribery and is forbidden.

No Employee or Third Party acting on behalf of América Móvil is authorized to make payments to Civil Servants in order to expedite paperwork.





If a Civil Servant makes clear that processing any kind of paperwork affecting the Company's operations will be conditional on specific requests, the area of the Company responsible for that paperwork shall stop that contact and immediately notify the Subsidiary's Compliance Officer to determine the legal steps that should be taken.

#### **5.4. Inspections or Verification of Authorities**

During inspections or verifications by government authorities, the only people authorized to be in contact with the Civil Servant(s) or with any person authorized to complete the procedure or responsible for carrying it out shall be:

- The head of the area subject to inspection or verification
- A representative of the Legal department of the Company
- A representative of the Subsidiary's Compliance Officer
- If applicable, one external lawyer acting in defense of the interests of the Company.

Giving, offering or promising any kind of Gift or Thing of Value, whether during an inspection or verification visit or upon its completion, is strictly forbidden.

Negotiating any fines or penalties for alleged irregularities during an inspection or verification visit is also forbidden at all times.

Any fine or penalty derived from the inspection or verification visit shall be informed to the Company's Legal department and the Subsidiary's Compliance Officer, and shall be managed, paid, or as applicable, contested according to law.

Any payment derived from fines or penalties must be made by wire transfer or a nominative check directly in the name of the government entity.

Making payments in cash or in kind, or writing checks to individuals (Civil Servants or Third Parties), is strictly forbidden.

The person responsible for the department shall get an official receipt from the relevant agency displaying the penalty applied, the situation that gave rise to that penalty, and the amount due.

#### **5.5. Public Tenders, Invitations or Direct Awards**

Due to the nature of the activities carried out by the Company and its Subsidiaries, services are offered to the Government or to government-run companies. In general, government procurement procedures are regulated by law.

Although it is true that América Móvil operates in several countries, and thus government procurement procedures may vary, we have seen that, in general, three schemes are more widely used:



- Public Tender
- Invitation to participate sent to a restricted number of participants
- Direct Award.

Trying to give, offer or promise, either directly or through a Third Party, any Gift or Thing of Value to a Civil Servant or a Civil Servant's Relatives in order to influence him/her to use his/her authority or clout to favor América Móvil in a public tender, private tender or direct award of a government Contract is forbidden.

In any event of Direct Awards, the Company's department responsible for the process shall document and clearly and transparently explain the reasons for the award, and comply at all times with guidelines in item 5.1 (Interaction with Civil Servants or Government Entities).

Employees shall refrain from obtaining, facilitating, giving or trying to benefit from confidential information from any source, including:

- Confidential Information of the Government disclosed in the tender or direct award procedure and not available to the public.
- Offering, transferring or providing confidential information of the Company not available to the public to Third Parties that may directly or indirectly take part in a public tender or direct award process.
- Obtaining or providing information and key data of a Competitor or the Company.

Likewise, Employees of the Company and its Subsidiaries, as well as Third Parties, shall refrain from discussing prices or amounts (bids) with their Competitors in any public or private tender, invitation to take part in a procurement process or sale of goods or services.

América Móvil reserves the right to contest before applicable legal forums any tender and/or direct award procedure in which it is unsuccessful, provided the respective authority failed to comply, in form or content, with applicable laws, rules or regulations.

### **5.6. Gifts, Entertainment and Hospitality**

In certain commercial relations, meals and other types of hospitality are culturally accepted as normal, and the general consensus is that they do not influence a person's decisions.

In this sense, giving or receiving Gifts, Entertainment and Hospitality may be acceptable as long as there is no expectation that the person who received them will actually give something in return.

If travel expenses are paid or offered, guidelines established in the Gifts, Entertainment and Hospitality Policy shall be followed.

As explained in the Gifts, Entertainment and Hospitality Policy, polite gestures must be appropriate, reasonable in value and under the circumstances, neither excessive nor frequent, and shall be reported to and authorized in advance by the Compliance Officer.



Employees are not authorized to accept or offer Gifts, Entertainment and Hospitality or Things of Value, from or to a Civil Servant or Third Party, or to carry out any kind of action or activity that may be interpreted as an incentive to influence a decision or obtain an advantage that may unduly benefit the Company, its Employees or Employees' Relatives, Friends or acquaintances.

Any Employees or Third Parties acting on behalf of América Móvil shall refrain from promising, offering, giving or accepting Gifts, Entertainment Expenses and Hospitality or Things of Value with the purpose of getting or maintaining business or unduly influencing the decisions of those receiving them.

Giving or accepting Gifts, Entertainment and Hospitality, or Things of Value, may seriously harm the reputation of the Company and may even be a crime.

If you have any questions about accepting or giving a Gift, Entertainment and Hospitality, follow the guidelines of the respective Policy or contact the Compliance Officer at [yocumplo@americamovil.com](mailto:yocumplo@americamovil.com)

### **5.7. Free Product**

As Employees of América Móvil, we should keep in mind that handing out Free Product may be part of the commercial strategies of the Company, and may be subject to applicable anti-corruption laws, rules and regulations.

As Employees, we shall not offer to a Civil Servant or Third Party Free Products or other incentives the value of which may be deemed inappropriate, or which may be considered an incentive to influence a decision or have an advantage that may unduly benefit the Company, its Employees or Relatives.

### **5.8. Sponsorships and Donations**

Sponsorships and Donations are an essential part of the Company's social responsibility and business; however, this type of activities are subject to local and international anti-corruption (and, in certain cases, to anti-money/assets laundering) laws, rules and regulations, because they may be used for purposes other than their intended purposes, to try to influence a decision or get undue advantages.

América Móvil has pledged to prevent such activities from facilitating Corruption, Bribery and Money Laundering, and is committed to protecting the goal of supporting social development initiatives, ensuring that Donations and Sponsorships are granted transparently and legally, and that funds are used for their intended purposes.

All the Donations made by the Company shall comply with the terms and conditions of América Móvil's Donation Policy.

As for Sponsorship agreements, they shall always be executed directly by the Company, without intermediaries, and the corresponding Agreement shall clearly and transparently specify its purpose, as well as the agreed amount, benefits and term.

All the Sponsorships executed by the Company shall comply with the terms and conditions



of América Móvil's Sponsorship Policy.

For any questions regarding Sponsorships or Donations, check the guidelines of América Móvil's Donation or Sponsorship Policies or, if applicable, contact the Compliance Officer via email to [yocumpla@americamovil.com](mailto:yocumpla@americamovil.com)

### **5.9. Conflicts of Interest**

A Conflict of Interest arises when an Employee or Third Party bases its decisions or actions not on its professional duties but on personal interests or those of a Relative or Third Party, even if they could be detrimental to the Company's interests.

A Conflict of Interest may be categorized as Corruption if it fails to be reported properly in accordance with América Móvil's Conflict of Interest Policy, so it is mandatory for Employees and Third Parties to be familiar with this policy, understand it and comply with its terms and conditions.

If in doubt as to whether a Conflict of Interest could arise, please contact the Compliance Officer at [yocumpla@americamovil.com](mailto:yocumpla@americamovil.com)

### **5.10. Third-Party Due Diligence**

We should keep in mind that we constantly need to enter into agreements with Third Parties to be provided the necessary goods and/or services for our operations or commercial activities.

Many times, Third Parties act on behalf of the Company, so the Company could be negatively affected by any illegal behavior, act of Corruption, bribery or other actions of such Third Parties in violation of our Code of Ethics and/or Policies.

At América Móvil, we are committed to the prevention of any act of Corruption in connection with Third Parties acting on behalf of the Company; this is why Due Diligence shall be conducted before engaging any Third Party to identify, analyze and assess Corruption or illegal activity red flags.

Our Company's onboarding process requires Third Parties to comply with the terms and conditions of América Móvil's Third-Party Due Diligence Protocol.

Should you have any question when hiring a Third Party, follow applicable guidelines in procurement policies and América Móvil's Third-Party Due Diligence Protocol, or contact the Compliance Officer at [yocumpla@americamovil.com](mailto:yocumpla@americamovil.com)

### **5.11. Pre-Employment Due Diligence**

At América Móvil, we are convinced that knowing our Employees is just as important as knowing any other party with whom we have a relationship in the course of our business.

Therefore, a background check of all candidates shall be conducted during selection and onboarding, to avoid hiring people that may pose a risk to the integrity of the Company and minimize reputational risks to the Company.



All Employment agreements for the Company shall comply with the terms and conditions of América Móvil's Pre-Employment Due Diligence Protocol as well as applicable Human Resources policies and procedures.

### **5.12. Engaging Civil Servants**

We are a Company in constant growth, so we are actively identifying and attracting talent. Specific provisions govern the hiring of current or former Civil Servants and we must observe them.

The Company may be interested in recruiting an experienced and skilled current or former Civil Servant, but this kind of onboarding process must comply with specific rules to avoid any actual or apparent violation of the law. Thus, at América Móvil the following actions are forbidden:

- Any special treatment of current or former Civil Servants, or his/her Relatives, during the selection and onboarding process.
- Discussing employment prospects with Civil Servants actively involved in public tenders, direct awards or Government procurement, or in general, inspection or verification procedures.
- Hiring Civil Servants in order to have access to privileged information that may translate into advantages in the market.
- Hiring Civil Servants that, by law or by contract, cannot be employed by the Company.

Any hiring of current or former Civil Servants shall be in line with the Pre-Employment Due Diligence Protocol.

### **5.13. Mergers and Acquisitions**

Anti-corruption laws encourage companies to complete transactions and formalize acquisitions transparently with entities that promote and reinforce ethical and honest values in their operations.

Due to this reason, any transaction involving a merger or acquisition must comply with provisions in the Due Diligence Protocol for this type of operations, allowing the identification and assessment of possible risks to the Company. Such assessment will allow the Company to make objective decisions that comply with the law.

Part of the Due Diligence process includes the identification of possible acts of Corruption and Money Laundering in which the counterparty, its officials, directors and/or managers may have been involved, so this is an essential requirement to formalize the transaction.

### **5.14. Company Vehicles**



If a vehicle owned by the Company is involved in and connected with a violation of traffic regulations or accident, Employees and passengers shall refrain from negotiating or surrendering any Thing of Value to Civil Servants.

Any fines or penalties imposed must be processed and paid according to the law and applicable policies.

### **5.15. Appropriate Accounting Records**

National and international laws in this matter, as well as anti-corruption laws applicable to América Móvil, require the Company to be transparent in its accounting records and posting of transactions.

Every accounting record should clearly, transparently and accurately reflect the nature of the transaction without any ambiguous items that may be used, intentionally or out of ignorance, to conceal information or transactions that may be or appear illegal or lead to false, incomplete or unfounded documentary information. For example; using the terms such as "consultant fees", "advisors", "technical assistance", "commissions", "miscellaneous," etc. to conceal a Bribe or any other act of Corruption.

No account should be left out of the books and other accounting records to make it easier to hide undue payments.

Therefore, it is our responsibility to keep an internal accounting system capable of detecting and avoiding any payments that may be categorized as acts of Corruption.

All the financial information generated by the Company shall be accurate, complete and clear, in accordance with generally accepted accounting principles or the international financial reporting standards, not only to avoid penalties, but also to be transparent, honest and honorable in our operations.

Any activity designed to alter, forge, destroy, hide or modify accounting records is expressly forbidden.

## **6. Prevention**

In order to prevent any act of Corruption, América Móvil, its Employees and Third Parties agree to:

- Abide by our Code of Ethics, this Policy and other applicable Company policies, international anti-corruption conventions, international laws including the FCPA, and applicable local laws in each of the countries where we operate.
- Comply with all financial reporting standards applicable to the Company, because any omission, misrepresentation or lack of transparency in our books and accounting records is a crime, and is strictly forbidden.
- Conduct all interactions with Civil Servants in accordance with this Policy, openly and transparently, in order to minimize actions that may be interpreted as



corruption.

- Document and record all interactions with Civil Servants in accordance with this Policy
- Conduct negotiations, procurement and transactions according to applicable laws, rules and regulations, our policies and internal procedures, and keep records thereof so that they can be reviewed in an audit.
- Ensure that all payments made by the Company or on its behalf are legal, with the corresponding receipts or official supporting documents, and always linked to the reception or purchase of goods, rights or services effectively provided to and received by the Company.
- Adopt internal controls and make reports, if necessary, through the Whistleblower Portal and/or before the corresponding authorities, in the event any Employee or Third Party incurs in a violation of the Company's Code of Ethics, this Anti-corruption Policy or any laws, rules or regulations.
- Promote anti-corruption practices across the value chain, train personnel on the corresponding preventive measures, and prepare information dissemination campaigns.

Likewise, América Móvil's Employees or Third Parties shall refrain, either directly or on its behalf, from:

- Offering, giving, promising, paying, authorizing the payment or receiving, directly or indirectly, money, Gifts, Entertainment and Hospitality or any Thing of Value or service from or to any Civil Servant or Third Party with the purpose of influencing a decision that may give an advantage or even a benefit to the Company or its Subsidiaries.
- Entering Contracts with Third Parties that may provide opportunities for Bribes. Making or negotiating payments to Third Parties if there is any sign that they may commit Bribery on our behalf.
- Giving Gifts, Entertainment and Hospitality or any Things of Value to Third Parties, Civil Servants or their Relatives, in violation of this Policy and the Gifts, Entertainment and Hospitality Policy.
- Receiving Gifts, Entertainment and Hospitality or any Thing of Value from Third Parties, Civil Servants or their Relatives, in violation of this Policy and the Gifts, Entertainment and Hospitality Policy.
- Making Donations or payments, in cash or in kind, to political parties or members of political campaigns, with resources of the Company or on its behalf. Personal Donations are permitted in accordance with local laws applicable.
- Participating as mastermind, conspirator, instigator, accessory, abettor or otherwise, or associating or colluding with others to commit or attempt to commit





an act of Corruption.

### **7. Policy Compliance Oversight and Verification**

The Compliance Officer, the Subsidiary's Compliance Officer and Internal Audit are responsible for supervising, overseeing and, if applicable, auditing the due compliance of provisions in this Policy, periodically assessing its effectiveness.

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

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

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

Remember that 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**

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

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

As Employee of América Móvil, you are responsible for disclosing the terms and principles of this Policy and inviting any Third Parties with whom you have business relationships to comply with them.

### **9. Cooperation and Coordination**

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





Accordingly, Subsidiaries should have a legal compliance internal procedure adapted to specific anticorruption and anti-bribery obligations in each country.

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

### **10. Penalties**

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

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

### **11. Whistleblower Portal**

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

You, just like every other Employee of América Móvil and Third Parties, are entitled and have an obligation to report directly to your line manager, the Compliance Officer, the Subsidiary's Compliance Officer, or through the Whistleblower Portal, any behavior in violation of this Policy, our Code of Ethics or any applicable law, rule, regulation, or internal policy or procedure, and in general, any unethical behavior.

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

Remember that 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 information for any follow-up during the investigation.

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



Likewise, it is important to make it clear that no provision in this Policy shall be understood to prevent people from directly filing complaints before any authority having jurisdiction. In such cases, our suggestion is that it should be reported to the Legal and/or the Compliance Officer, so that they can help the authorities with any investigation, if necessary.

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

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

### **12. Questions and Comments**

If you have questions, comments or suggestions regarding this Policy, please contact us in the following email address: [yocumplo@americamovil.com](mailto:yocumplo@americamovil.com)