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Donations Policy

América Móvil



1. Introduction

We at América Móvil, S.A.B. de C.V., its Subsidiaries and affiliates (hereinafter, “América Móvil” or the “Company”) are committed to social changes as catalyzers of development and quality-of-life improvement for the people and communities that we serve, and for our environment. The social efforts of the Company through donations are designed to make contributions to governments, civil organizations, educational institutions, charities, cultural or sports organizations, among others, that share our values and principles.

América Móvil 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 or applicable laws, rules and regulations, 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 Policy is to establish compliance principles and general guidelines to ensure the proper control, reception and management of goods or services categorized as donations.

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. other than family, with whom the Employee has a personal relation or some kind of affinity, including close friendships and personal business contacts.

América Móvil’s Code of Ethics: An institutional document that establishes the principles of conduct and values of América Móvil, it is generally applicable to all Employees and Third Parties, as well as any other person related to the Companies of América Móvil.

Conflict(s) 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 Third Party are based on the Employee’s or Third Party’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.

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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 undue benefit for the Company, personal benefits or advantages to a Third Party and is known as Private Corruption.

Due Diligence: This means a background check of a Donee in order to identify potential legal, financial, Corruption, money laundering or reputational risks.

Donation: A contract whereby the company (Donor) transfers to a private, public or non-profit entity, free of cost, their services, goods or money (Donation), and the private, public or non-profit entity (Donee) accepts the Donation for (i) social welfare or assistance; (ii) scientific; (iii) health; and/or other similar not-for-profit purposes and not for political, entertainment or similar purposes; without consideration or any benefit to the company or any individual.

Monetary Donation: Donation in money made by the Donor by wire transfer from accounts held on behalf of the company at institutions operating in the financial system of the relevant country to the account designated by the Donee; or by nominative check from the account of the Donor company, for deposit to the Donee's account.

Donation in Kind: donations consisting of a transfer of ownership of goods or the provision of services. These goods shall be the property of the Donor's company, and categorized as obsolete, defective or below standard goods not fit for trade, or new goods. With regard to services, this term refers to those that constitute the main purpose of the Company; or own services offered by Company professionals or technicians as consultancy or troubleshooting services, or in general, any of the services offered by the Company.

Donee: An artificial person, either private, public or social sector, receiving the Donation as property.

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

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.

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

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

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/>

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.

Civil Servant (domestic/foreign): This is a person who holds a government position or is an Employee at a Government entity 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 of election. Officers in public international organizations (World Bank, United Nations, International Monetary Fund) are also deemed Civil Servants.

Red Flag(s): Any and all flags pointing to Corruption, fraud, Bribery or money laundering risks, or to any unethical practice in accordance with applicable anti-corruption laws, rules and regulations.

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



Requesting User: Employee of the Company responsible for requesting a Donation.

5. General Guidelines

Any Donation, whether Monetary or in Kind, to be given or received, will be subject to the following guidelines:

- All Donations should invariably be authorized by the CEO of the Subsidiary and the CEO of América Móvil, and notice thereof should also be given to the Compliance Officer in accordance with the procedure established in this Policy.
- Under no circumstances should donations in cash be authorized. Monetary Donations will in all cases be given by nominative check or wire transfer.
- For every Donation, a tax receipt that meets the requirements to be deductible will be issued, in accordance with the laws applicable for each Subsidiary. Otherwise, the CEO of the Subsidiary will require express authorization of the CEO of América Móvil to record the entry as a non-deductible expenditure.

5.1. Conditions applicable to every Donation

- Donations must go to legally organized or incorporated Donees.
- They should be given to Donees that share the Company's philosophy of social responsibility and work to promote social well-being (for example, low-income sectors, regions and groups of people), encourage the development of educational, cultural or sports programs or scientific or technological research, or the care and preservation of natural resources, or provide help in times of natural disasters or pandemics.
- Donations will be made on behalf of the Company and with goods and services owned by the Company.
- Making personal Donations, whether monetary or of goods or services owned by the Company, is forbidden.
- Having the Company Demand Third Parties to give, free of cost, any goods and/or services as a Donation, is forbidden.
- Monetary Donations may only be granted to organizations authorized to receive donations according to applicable laws, and shall not be given to Individuals or Civil Servants as a personal donation.
- The Donee must provide evidence that the Monetary or in-kind Donation was used for the stated purpose, within one year following reception/granting of the Donation.
- The correct use of a Donation will be demonstrated by submitting written documents and/or documentary records, including but not limited to, photographs, video recordings, event agendas or links to websites.



- Ensure and verify that the relationship between the Requesting User and the Donee does not constitute a Conflict of Interest.
- That it will not create a legal or reputational risk for the Company.
- The Donation must be duly posted in the accounts, books and other accounting records of the Company and in accordance with applicable laws in tax matters.

5.2. When the Donee is a Public Entity

- The Donation shall be to the name of the public entity, and not that of a Civil Servant. This does not prevent or exclude communications to coordinate with the civil servants responsible for the entity or those in charge of the coordination.
- The value of Donations must be reasonable and exceptional, never frequent.
- The Donation process shall be transparent, so it will be made public through the website of the Company and/or the corresponding social media.

5.3. Impediments to donations

América Móvil and its Subsidiaries agree to refrain from offering or making donations to:

- Individuals.
- Civil servants, political parties and/or their candidates.
- Entities belonging to or related to Civil Servants.
- Unions.
- Specific causes of Company Employees.
- Private companies or for-profit social institutions.
- Institutions or organizations where Employees, executives, directors or shareholders of the Company, or their Relatives or Friends, have a presence or direct responsibility.

5.4. Donation Request and Delivery

The Requesting User must submit to the Chief Financial Officer of the Subsidiary the Donation Request Format (Appendix A) duly filled in, along with the Documentation of the Donee specified in Appendix B), for its revision and validation on site.

If it complies with all the requirements and guidelines of this Policy, it will be sent for final authorization and signing to the CEO of the Subsidiary.

The Chief Financial Officer of the Company must validate on site the following elements:

- That the Donee is, in fact, a legally existing organization.
- That the person requesting the Donation is acting on behalf of the Donee and is

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empowered to make the request, by checking the articles of incorporation or charter and/or powers-of-attorney and work credentials.

- That the requesting Donee is legally authorized to receive Donations, including reviewing the Directory of Authorized Donees issued by the Mexican Tax Administration Service, or any other lists issued by competent bodies, according to the laws, rules and regulations applicable to each Subsidiary.
- That the Donee complies with all the guidelines established in this Policy and the documentation requested in Appendix B, and that such documentation is complete and correct.

Once the points mentioned in the preceding paragraph are validated, the Chief Financial Officer will send the Donation Request Format, duly filled in and signed, to the Compliance Officer.

The Compliance Officer will review the information contained in the Donation Request Format and, if applicable, make any pertinent remarks or recommendations.

Likewise, the Compliance Officer will fill out the Due Diligence format for Charities (Appendix C) to document the assessment and opinion of whether it is appropriate to grant the Donation to the organization based on any Corruption and anti-money laundering risks identified.

Based on the recommendations issued by the Compliance Officer and the validation of the Chief Financial Officer, the CEO of the Subsidiary will send the Donation Request format to the CEO of América Móvil for final approval.

Once authorized by the CEO, all the necessary administration tasks will be completed to grant the Donation.

The Compliance Officer of América Móvil will prepare a letter of Donation in the Company's letterhead, addressed to the beneficiary Donee, with all information related to the Donation.

Donations will be announced publicly through the media the Company deems appropriate, unless bound to secrecy or confidentiality in accordance with any legal provision.

The Donee, upon receiving the Donation, will submit the Certification of Compliance with Anti-corruption Laws format (Appendix H), duly filled in, as well as evidence that the goods were used for the established purposes, in accordance with the general guidelines of this Policy.

Depending on the type of Donation, the following should be considered:

- Monetary Donation.
The Requesting User will submit the payment proposal to the Chief Financial Officer of the Company, attaching the Donation



Request format, duly reviewed and authorized (signed by the Chief Financial Officer, the Compliance Officer of América Móvil and of the CEO of the Subsidiary), to schedule the payment, and finally, send it to the Treasury of the Subsidiary for the payment to be issued.

- In-Kind Donation.
The Requesting User will request the Donation from the corresponding warehouse, using the In-kind Donation Outbound Format (Appendix G), attaching as supporting document the Donation Request Format, duly reviewed and authorized (signed by the Chief Financial Officer, the Compliance Officer of América Móvil and the CEO of the Subsidiary).

The Chief Financial Officer of the Subsidiary will be responsible for verifying that the receipt submitted by the Donee is valid for tax purposes.

The Company's Internal Control or Internal Audit Manager, or the person appointed by him/her, shall ask the Donee to hand in a letter, with acknowledgment of receipt in the Donee's letterhead, in accordance with the following requirements and together with the following documents:

- Name and signature of the person receiving the Donation, who must be a legal representative of the donee.
- Donation delivery date.
- For in-kind Donations, a description of the goods delivered as a Donation.
- For Monetary Donations, payment receipt and bank documents evidencing payment.
- A tax-deductible receipt, according to applicable tax laws.
- A photocopy of the official ID of the legal representative of the Donee receiving the Donation.

Promptly following delivery, the Donation must be posted in the Company's accounting records.

5.5. Control of Donees

The Compliance Officer will create and maintain a database of Donees that have been authorized to receive Donations from the Company, and organizations that have been rejected.

If a subsequent or later Donation is requested for the same Donee, the Requesting User will fill out again the Donation Request Format and ask the Compliance Officer which data and information should be required again from the Donee to update the database and the corresponding file, and shall inform if a new Due Diligence report is necessary.

The Compliance Officer will keep the files of all Donees, at least with the following information:



- Corporate information collected when assessing the request (Appendix B).
- Donation Request Format, duly signed and authorized.
- Donee Due Diligence Format.

If the Donation was authorized:

- Certification of Compliance with Anti-Corruption Laws Format (Appendix H).
- Donation Delivery letter with acknowledgment of receipt.
- Copy of the respective bank transfer or check, as well as the account statement showing the corresponding payment.

5.6. Due Diligence Procedure

For Monetary or in-kind donations of a value in excess of ten thousand U.S. Dollars (US\$10,000.00) or its equivalent in local currency, the Chief Financial Officer of the Subsidiary will request the Compliance Officer to carry out the background check and Due Diligence of the donee.

The Due Diligence will include an investigation covering the following points:

- Date of organization and purpose of the donee.
- The work plan or document justifying the need for the Donation.
- Evaluation of the consistency of the historical activities of the donee given its purpose.
- Identification of the partners and executives of the requesting donee.
- Identification of the members of the board of directors or managers, governing or trustee board, or any similar form of governance.
- Investigation of Politically Exposed Persons (PEPs), using the information sources listed in Appendix D.

The outcome of the investigation will be recorded in the corresponding Due Diligence format (Appendix C).

If, as a result of the Due Diligence, any Corruption or Money Laundering Red Flag of those listed in Appendix E is detected, the Compliance Officer will determine, based on the risk rating, if the authorization process for the donation can go ahead even with the red flags or if, as applicable, pertinent legal action should be taken.

The Compliance Officer, once approval of the Head of the requesting area is obtained, will report any findings in the Compliance Officer Recommendations Format (Appendix F), which should include at least: the corresponding background check, the Red Flags detected, analysis and considerations, as well as a conclusion favoring approval or a recommendation to make adjustments or to reject.



In order to update and monitor possible Corruption or money laundering Red Flags detected during the investigation of the donee, the Due Diligence report will be valid for two (2) years, and will be completed again if there is a new request, new relevant information affecting the decision to grant or not the donation, or if deemed necessary.

At the end of the year, the Compliance Officer must submit a final report of all donations granted to the CEO of América Móvil and the Ethics Committee.

6. Policy Compliance Oversight and Verification

The Compliance and Internal Auditing Officers are responsible for supervising, overseeing and, as applicable, auditing the due compliance of all provisions in this Policy, and periodically assessing their efficacy.

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. It is also responsible for providing guidance to Employees regarding this Policy, via this email address 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/>

7. 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.



8. Cooperation and Coordination

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

Accordingly, Subsidiaries must have in place internal procedures to ensure legal compliance based on their specific obligations regarding legal Donations, anti-corruption and anti-bribery rules 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.

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 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 defaults being also penalized by applicable laws and authorities having jurisdiction.

10. 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>.

Each Employee of América Móvil and Third Party have the right and an obligation to directly report their line manager to the Compliance Officer or through the Whistleblower Portal in connection with any behavior that infringes this Protocol or any applicable laws, rules, regulations, Policies or internal procedures 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.

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Remember that failures to report a serious breach of ethics may have disciplinary consequences, as you may be covering up an unethical act or a crime. 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.

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

It is also important to note that nothing in this Policy is meant to discourage employees from reporting any misconduct directly to law enforcement authorities. In such cases, our suggestion is that it should be reported to Legal and/or the Compliance Officer, so that they can cooperate with the authorities, 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.

11. Questions and Comments

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



Appendix A. Donation Request Format

Date:			
Mission of the organization:			
Main sources of funding of your organization <i>Establish % according to holdings.</i>	In Kind	Companies	
		Foundations	
		Individuals	
		Government	
	In Cash	Companies	
		Foundations	
		Individuals	
		Government	
Have you received in the past any Donations from [name of the donor company]?			
Yes__No___ If yes, please provide details of the Donation and date. _____			
If you receive the Donation, do you agree to deliver a report showing the allocation of resources?			
Yes__No___ Specify the delivery time following the Donation. _____			

GENERAL INFORMATION OF THE ORGANIZATION:

Company name:		*Federal Taxpayer Number:		*CLUNI:	
Address:					
Telephone number:					
Web page / social media:					
Original Articles of Incorporation or Charter No.:		No. of Notary:		Date of incorporation:	
Name of legal representative:		Federal Taxpayer Number:		CURP:	
Public sector?:					

**Please attach a copy of the documentation not more than 3 months old.*

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GENERAL INFORMATION OF REQUESTING DONEE'S CONTACT	
Full name:	
Title:	
Email address:	
Brief description of functions and experience:	

MEMBERS OF THE BOARD OF TRUSTEES AND/OR BOARD OF DIRECTORS		
#	Full name	Role in the organization and, if part of another Donee, specify name
1		
2		
3		
4		

DONATION DETAILS			
Justification for the Donation: You should answer the following questions: What? What for? Why?			
One-off:		Authorized Program:	
Type of Donation:			
Donation destination/ application:			
Value of Donation (local currency):			
If in cash, specify form of payment:			

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DATA TO RESPOND IF THE REQUESTING ENTITY IS PUBLIC SECTOR		
#	Full name	Role in the organization and, if part of another Donee, specify name
1		
2		
3		
4		

REQUESTED BY

REVIEWED BY

[Name, Job Position and requesting party's signature]

Finance and Management Director

REVIEWED BY

AUTHORIZED BY

Compliance Officer

[Name, role and signature]



Appendix B - Required Documentation of the Donee

The following documentation shall be provided by the Requesting Donee to start the Company's authorization process for the Donation:

- Copy of the articles of incorporation or charter.
- Copy of the public instrument evidencing that powers were granted to the legal representative.
- Official ID of the legal representative.
- Certificate of registration with tax authorities or taxpayer ID number.
- Proof of address*.
- Copy of the most recent certificate informing that the organization still is an authorized Donee.
- Tax compliance report (current month).
- Employer's registration card.
- Copy of the front page of a bank account statement of the donee displaying the account number or CLABE unique bank code*.

**The document submitted should be no more than three months old from the date of Donation request.*



Appendix C. Donee Due Diligence Format

Background Check

Date:	
Requesting Department:	
Executive summary	
Brief summary of the transaction that originated the Due Diligence process.	
Initial Information provided	
Name of the Donee	
Contact details	
Main activities	
Name of board members and key executives	
Detailed findings	
List of findings derived from the Due Diligence process.	
Beneficiary Donee	
A. General Information	Company purpose.
B. Relations with government	
C. Legal Background (including sanctions, fines and penalties)	
D. Potentially adverse information	



V. Appendices

[Empty rectangular box for appendices content]

PREPARED BY

REVIEWED BY

[Name and signature of prepare]

Compliance Officer



Appendix D - Due Diligence Information Sources

An effective reputational and background investigation includes databases and publications from different information sources combined in a single procedure to produce a comprehensive verification:

1. Compliance databases (*Trace, World Compliance, World Check*).
2. Lists of firms and individuals sanctioned and debarred by local, national and international organizations (OFAC, World Bank).
3. Blacklists and targeted international action (OFAC, Interpol, FBI, PGR),
4. Search engines (*Google, Bing*).
5. News and the media (local, national and international).

As follows, there are the lists of information sources of compliance to consider for the Due Diligence of Donees.

Business	Description	Items	Findings		
a. Search of adverse news	a) Search of electronic news and information available to the general public, both domestic and international, in order to verify if there are negative news, articles or reports that may affect the Company's reputation * At least the last 2 years must be reviewed. Print the first four pages of the search results of the search engine. b) Confirm that the Donee has good standing with the U.S. Embassy, consulate or other important authorities, as applicable. Print the first page of the search results of the engine.	<input type="radio"/>	Donee	<input type="radio"/> Yes	<input type="radio"/> No
		<input type="radio"/>	Officer of the Donee	<input type="radio"/> Yes	<input type="radio"/> No
		<input type="radio"/>	Board	<input type="radio"/> Yes	<input type="radio"/> No
		<input type="radio"/>	Key Employees	<input type="radio"/> Yes	<input type="radio"/> No
		<input type="radio"/>	Directors or Key Employees PEP	<input type="radio"/> Yes	<input type="radio"/> No
		Search run on:			
		<input type="radio"/>	Internet	<input type="radio"/> Yes	<input type="radio"/> No
		<input type="radio"/>	Other means (specify)	<input type="radio"/> Yes	<input type="radio"/> No
		<input type="radio"/>	U.S. Embassy / Consulate	<input type="radio"/> Yes	<input type="radio"/> No
		<input type="radio"/>	Other regulating authorities (specify)	<input type="radio"/> Yes	<input type="radio"/> No
		Search run on			
		<input type="radio"/>	Internet	<input type="radio"/> Yes	<input type="radio"/> No
		<input type="radio"/>	Other means (specify)	<input type="radio"/> Yes	<input type="radio"/> No

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Activity	Description	Items	Findings	
	Remarks:			
b. PEP/ Foreclosure / Screening lists / Black lists	Review: - PEP (<i>Politically Exposed Person</i>) - Foreclosure - Screening Lists - Black lists	<input type="radio"/> List of penalized civil servants Licenses used: <input type="radio"/> <i>World Compliance</i> <input type="radio"/> <i>World Check</i> <input type="radio"/> <i>Lexis Nexis</i> <input type="radio"/> <i>Dow Jones</i>	Yes <input type="radio"/> No <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/>	
	Remarks:			
c. Legal Records	a) Search of federal and state legal records of the Donee for criminal and tax proceedings, judgments, lawsuits, disputes, fines and penalties.	Licenses used: <i>World Compliance</i> <i>World Check</i>	Yes <input type="radio"/> No <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/>	
		Search in criminal records (C) and tax (T) records:		
		Proceedings	C <input type="radio"/> T <input type="radio"/>	Yes <input type="radio"/> No <input type="radio"/>
		Judgments	C <input type="radio"/> T <input type="radio"/>	Yes <input type="radio"/> No <input type="radio"/>
		Lawsuits	C <input type="radio"/> T <input type="radio"/>	Yes <input type="radio"/> No <input type="radio"/>
		Disputes	C <input type="radio"/> T <input type="radio"/>	Yes <input type="radio"/> No <input type="radio"/>
		Fines	C <input type="radio"/> T <input type="radio"/>	Yes <input type="radio"/> No <input type="radio"/>
	Sanctions	C <input type="radio"/> T <input type="radio"/>	Yes <input type="radio"/> No <input type="radio"/>	
Remarks:				

PREPARED BY

[Name and signature of preparer]

REVIEWED BY

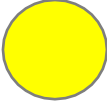
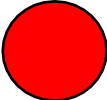
Compliance Officer



Appendix E - Corruption Red Flags

Below is a list of scenarios and behaviors that, generally, are Red Flags for possible Corruption or Bribery situations.

The risk rating of each scenario is also provided, as well as the measures that should be taken upon identification.

Assess and issue recommendation	
Alert 	<ul style="list-style-type: none">• The Donation is requested by a government organization.• Civil Servants or their Relatives are senior executives or trustees in the Donor's committee.
Do not go ahead with the donation procedure	
Alert 	<ul style="list-style-type: none">• Lack of clarity regarding the purpose of the institution requesting the Donation.• The Donee refuses to disclose the names of its senior executives or trustees in its committee.• Lack of documentation or incorrect information provided by the Donee.• The Donation is a condition to complete or speed up paperwork submitted to certain authority.• The Donation is a condition to establish or maintain certain business relationship.• Negative information (in connection with fraud and/or Corruption) of the Donee, its key executives or members of its governing body is found.• The Donee, any of its key executives, or members of its governing body are included in a black list.



Appendix F - Compliance Officer Recommendations Format

Requestor's name: _____
Donation: _____

Background:

Critical points:

Analysis and considerations:

Conclusions

Compliance Officer

[Name of preparer]
[Title]



Compliance Recommendations Format Fill-out Instructions

I. Type of Donation:

- Specify the type of Donation (in kind or Monetary)

II. Background:

Brief description of the Donation, mentioning:

- Name of the donee
- Date of incorporation or organization of the donee
- Company purpose of the donee
- Connection between the Donation and the company purpose of the donee
- Type of relationship between the Company and the donee at present
- Impact of the donation for the donee (value and condition of the donation)
- Reason for the donation

III. Critical points:

- Red Flags and Corruption risk(s) identified
- Breach of Company policies

IV. Analysis and considerations:

Consider the Company's anti-corruption anti-Money Laundering policies and procedures, as well as the risks that may be incurred if the Donation is approved.

Provide justification for the response regarding compliance or noncompliance with the criteria set by the Company.

V. Conclusions:

- Donation is authorized/is not authorized.



Appendix G - Goods Out Format – In-Kind donations

Name of the Requesting User: _____

Date: _____

Title: _____ Area: _____

Ref.	Description of item	Unit	Quantity

Remarks:

<p>DELIVERY</p> <p>_____</p> <p><i>[Name and signature]</i></p>	<p>I RECEIVED GOODS</p> <p>_____</p> <p><i>[Name and signature]</i></p>
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Appendix H. Certification of Compliance with Anti-corruption Laws

[Date]

The Treasury of **[Name of the Donee]** hereby certifies that it has received as a Donation **[Money, in-kind, services or other (specify)]** the quantity of **[Quantity and description of the goods and services donated]** listed below, which were donated to us by the Company for the purpose of **[Specify the Donation object]**.

Quantity	Unit of measurement	Description	Check No. or wire transfer (if applicable)

(Add fields as necessary)

Likewise, I declare under oath that only the elements described and documented in the paragraph above have been received, and that the goods delivered as a Donation or any money received will not be traded or transferred to a Third Party, and will not be used in violation of applicable laws.

The Donation will be used in furtherance of the company purpose of my principal only; and I agree to send information to the Company as evidence of the good use of the Donation, in accordance with América Móvil 's Donation Policy.

Received,

Signature of the legal representative of the Donee

Name: *[Full name]*