

Anticorruption Policy

At América Móvil we recognize that we operate in high-risk regions for corruption. Therefore, strengthening our [Anticorruption Policy](#) and developing a series of complementary policies to achieve effective corruption control has been a priority of our Integrity and Compliance Program.

We updated our Anticorruption Policy, establishing clear guidelines applicable to all our employees and Third Parties in anticorruption matters. Having a proper and effective prevention system, control, surveillance, and auditing, allows us to guarantee that any activity carried out within the Company or on its behalf, is based on our [Code of Ethics](#), on our Integrity and Compliance Program, and in compliance with the applicable laws to protect the Company, our employees, shareholders, and business partners.

We define corruption as follows: In the public field, corruption is the power abuse for one's own benefit or the Company's benefit. When interacting with Public Officials or Governmental Entities, it is known as Public Corruption. In the field of private parties, this is, when they perform actions or omissions aimed to get some undue benefit for the Company, personnel or for a Third Party, and it is known as Private Corruption. Some examples of corruption acts are fraud, occupational fraud, conflict of interest, collusion, concealment, bribery, influence peddling, and facilitation payments (among others); whether they are carried out by an employee or a Third Party; and regardless of whether they involve a public officer or are carried out between individuals. All these activities are strictly prohibited, regardless of if a person or a company benefit is obtained or not.

To enhance the provisions of the Anticorruption Policy, we have developed some additional policies that help us prevent corruption risks in some of the situations that we face in our operation, on a day-to-day basis:

- Interaction with public officials or government entities;
- Obtaining permits and licenses;
- Facilitation payments;
- Inspections or verifications of authorities;
- Public offerings, invitations or direct award of contracts;
- Gifts, entertainment and hospitality expenses;
- Free products;
- Donations
- Sponsorships and donations;
- Conflicts of interest;
- Due diligence for hiring Third Parties;
- Due diligence for hiring employees;
- Hiring of public officials;
- Mergers and acquisitions;
- Utility vehicles; and,
- Appropriate accounting records.

Anticorruption Training Program

In order to ensure understanding of our policies and what is expected of employees, suppliers, distributors and contractors, in 2020, we designed the “Effective Control of Corruption” course together with CIDE (*Centro de Investigación y Docencia Económicas, A.C.*) and Transparency International. We have trained all our permanent employees through this mandatory online course, and we are currently training our Third Parties through the educational platform: *Capacítate Aliados*.

Anticorruption in the Supply Chain

We want to make sure that any activity carried out by or on behalf of our Company is based on the ethics and values that characterize us, condemning corruption, bribery, fraud, or any other illegal act that may occur throughout our value chain. Therefore, we have incorporated an anticorruption clause in all the contracts that we sign with Third Parties in all our operations; while through our Third Party Due Diligence Protocol we request that suppliers comply with the highest standards of anticorruption policy and programs.

Audit & Certifications

All our operations are audited every year by a Third Party in compliance with Sarbanes-Oxley regulations. For the past 5 years we have not had any incidents related to corruption.

To date, 25% of our subsidiaries have the ISO:37001 certification on anticorruption. Furthermore, last year, *Ámerica Móvil*, *Global Hitss* and *Ámerica Móvil Contenido* received the *Trace International Inc.* certification on antibribery and anticorruption.