



**Contents**

1. Introduction.....2

2. Objective .....2

3. Scope.....2

4. Definitions.....2

5. General Guidelines .....5

5.1. Conditions that every Donation should comply with.....5

5.2. When the Donee is a Public Entity .....6

5.3. Impediment to offer or perform donations.....6

5.4. Request and Delivery of Donations .....6

5.5. Control of Donees.....8

5.6. Due Diligence Process.....9

6. Supervision and Verification of the Policy Compliance .....10

7. Training and Release .....10

8. Cooperation and Coordination .....11

9. Penalties .....11

10. Portal of Complaints .....11

11. Doubts and Comments .....12

Annex A. Form of Donation Request.....13

Annex B. Required Documentation of the Donee .....16

Annex C. Form of *Due Diligence* of Donees.....17

Annex D. Information Sources for *Due Diligence* .....19

Annex E. Red Flags of Corruption.....21

Annex F. Form of Recommendations of the Compliance Officer .....22

Fill-out Instructions of the Form of Recommendation of Compliance .....23

Annex G. Form of Output of Goods – Donations in Kind .....24

Annex H. Certification of Compliance with Anticorruption Standard .....25



### 1. Introduction

At América Móvil, S.A.B. de C.V. and its Subsidiaries (hereinafter, “América Móvil” or “the Company”), we are committed with the social changes as catalyzers of development and improvement of the life quality of the people and communities to which we serve and of our surroundings. The social efforts of the Company, through the delivery of donations, are aimed to contribute, among others, to governments, civil organizations, educational institutions, charities, cultural or sports organizations that share our values and principles.

América Móvil has developed an Integrity and Compliance Program, which includes among others, a Code of Ethics, several internal Policies, as well as this Policy, to prevent and fight Corruption. The breach to the Code of Ethics, to the internal policies, or to the law that is applicable on matters of anticorruption, even when the action or operation is done out of Mexico, may generate civil and criminal penalties, which go from fines up to imprisonment sentences, and they are applicable both at personal level and at Company Level.

### 2. Objective

The objective of this Policy is to establish the principles and general guidelines of compliance to ensure the proper control, reception and management of the goods or services assigned as donations.

### 3. Scope

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

### 4. Definitions

**Friend(s):** Any person, external to his/her family, with whom the Employee keeps a personal relation of trust or an affinity link, the term includes 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 of general application for all the Employees and Third Parties, or any other person linked with the Companies of América Móvil.

**Conflict(s) of Interest:** It is a way of corruption that consists of an action that may be unduly influenced by some Personal, Family or Third Party interest. There is a Conflict of Interest when an Employee or a Third Party, guides its decisions or acts for his/her own benefit, which is frequently of economic or personal kind, opposing the responsibility of acting in the benefit of the Company when he/she is representing it.

# Donations Policy

## América Móvil



**Corruption:** In the public field, it is the power abuse for one's own benefit or the Company's benefit, and it is present 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 Supplier, and it is known as Private Corruption.

**Due Diligence:** It is the investigation of background of a Donee, in order to identify potential legal, financial, corruption, money laundering or reputational risks

**Donation:** A contract whereby the company (Donor) transfers freely to a private corporation, to a public entity or to a non-profit entity, money, goods or services of their own (Donation), the one who accepts it (Donee) to be aimed to (i) assistance or social well-being; (ii) scientists; (iii) health; and/or other similar non-profit aims, or political aims, or fun aims or other similar ones; not having a change in the retribution or benefit in favor of the company or any individual.

**Monetary Donation:** Donation in money made by the Donor by means of wire transfer from accounts open in the name of the company into institutions that comprise the financial system of the country that corresponds and to the account designated by the Donee; or a nominative check from the account of the Donor company, for deposit into the Donee's account.

**Donation in Kind:** they are those in which you transfer the ownership of goods or services are provided. These goods shall be the property of the Donor's company, which are aimed as unused goods or disposable goods for their trading, or new goods. Regarding the services, they refer to those that constitute the main object of the Company; or own services that offer professionals or technicians from the Company to give consultancy or solve certain problems, or in general terms, any of the services offered by the Company.

**Donee:** A corporation, either of the private, public or social sector, who receive the Donation as property.

**Employee(s):** Any person or persons who is (are) employed under an individual or collective labor agreement by América Móvil or any of its Subsidiaries.

**Relative(s):** It shall be understood up to the third grade of consanguineal relation. This is, close Relatives are considered as the following: sons, daughters, spouses, father, mother, grandparents, uncles/ aunts, grandchildren and cousins.

**Compliance Office:** It is the area of América Móvil responsible for establishing an Integrity and Compliance Program that includes proper and efficient policies and systems of control, surveillance and auditing, and which examines constantly and periodically the compliance of the integrity standards all over the organization. [yocumpla@americamovil.com](mailto:yocumpla@americamovil.com)

**Private Party(ies):** It is any person different from a Public official.

# Donations Policy

## América Móvil



**Portal of Complaints:** It is the internal platform of América Móvil through which the Employees or Third Parties may complain anonymously and confidentially about any breach to the Code of Ethics and/or to the Company policies through the portal <https://denuncias.americamovil.com/>

**Integrity and Compliance Program:** Program developed and supervised by the Compliance Office, including but not limited to: (i) the preparation of policies and other guidelines of the Company in order to comply with the currently valid law; (ii) the identification, prevention and mitigation of the operational and legal risks in order to guarantee a long-term reputational value of the Company and generate more certainty for its value chain; (iii) establishing proper and efficient systems of control, surveillance and audit, which constantly and periodically examine the compliance of the integrity standards in all the organization; and (iv) the operation management of the Portal of Complaints and coordination of training on matters of compliance.

**Public Official (national/foreign):** It is the person having a public job position or that is Employee of a Governmental Entity or any other decentralized unit of it, either elected or appointed, representing any Governmental level, this is, federal, national, state or municipality; including but not limited to, its legislative agencies, ministries or secretariats, judicial agencies, investigation agencies and organizations. Likewise, any member belonging to some political party or a candidate to any position of election. Likewise, the officials of public international organizations (the World Bank, the United Nations, the International Monetary Fund).

**Red flags:** Every sign that poses a risk of Corruption, fraud, Bribery, money laundering or any unethical practice in virtue of the law on applicable matters of anticorruption.

**Bribery:** it is a form of Corruption that consists of offering, promising or granting ,as well as demanding or accepting any benefit, either by cash or in kind, directly or indirectly to other person, so that every person does or stops doing something to ensure an undue advantage, or get, lead or hold business for a specific company.

**Subsidiary:** Any entity that is under América Móvil's control.

**Third Party(ies):** Distributors, representatives, consultants, commercial partners, agents, intermediaries, customers, contractors, lobbyists, advisors or suppliers who are part of the value chain of América Móvil or those who represent the Company during an interaction with another Third Party, a Government or Public Officials. This includes the civil society organizations and the education, charity, cultural or sports institutions to which the Company wants to make a Donation.

**Requesting User:** Employee of the Company in charge of managing the granting of a Donation.



### 5. General Guidelines

In order to grant or receive a Donation, no matter if they are Monetary or in Kind Donations, we should comply with the following guidelines:

- All Donations should invariably be authorized by the CEO of the Subsidiary and the CEO of América Móvil, and it should also be notified to the Compliance Office in accordance with the procedure established in the present Policy.
- Under no item, should there be authorization of the donations by cash. All the Monetary Donations should be done by nominative check or by means of wire transfer.
- Every Donation should have a fiscal receipt holding all the requirements to be deductible, in accordance with the applicable law at each of the Subsidiaries. Otherwise, the CEO of the Subsidiary should request the expressed authorization of the CEO of América Móvil to be able to record the expenditure as a non-deductible expenditure.

#### 5.1. Conditions that must be complied with by every Donation

- They must be delivered to Donees that are legally incorporated.
- They should be aimed to Donees that share the philosophy of social responsibility of the Company and which contribute to promote social well-being (for example, group of people, sectors and regions of low income), encourage the development of educational, cultural or sports programs, scientific or technological research, the care and preservation of natural resources or ancillary in cases of natural disasters or pandemics.
- They should be done in the name of the Company and with goods and services owned by the Company.
- It is forbidden to make Donations in one's own representation, and this includes money, goods or services which are owned by the Company.
- It is forbidden that the Company demands Third Parties to grant, freely, the goods and/or services that are object of the Donation.
- Monetary Donations may only be granted to organizations authorized to receive donations according to the applicable law and not to a Private Party or to a Public Official, personally.
- The Donee should demonstrate that the Monetary or in Kind Donation was used with the purpose established previously, within one year after the one in which the Donation was granted/ received.
- The correct use of the Donation should be demonstrated by means of written documents and/or documentary records, including but not limited to, photos, video recordings, event agendas or links to websites.
- Make sure and verify that the relation level between the Requesting User and the Donee does not constitute a Conflict of Interest.
- That it does not generate a legal or reputational risk for the Company.
- It must be recorded properly in the accounts, books and other ledgers of the Company and according to the laws on matters of taxes that are applicable.



### 5.2. When the Donee is a Public Entity

- Donation shall be in the name of a public entity, and not in the name of a Public Official. This does not prevent or exclude the fact of making coordination communications with the public officials responsible for the entity or those in charge of the coordination.
- The value of Donations should be reasonable and occasional, never frequent.
- The Donation process shall be transparent, so it shall become public through the website of the Company and/or of the corresponding social networks.

### 5.3. Impediment to offer or make donations

América Móvil and its Subsidiaries commit themselves not to offer or make donations to:

- Private Parties.
- Public Officials, political parties and/or its candidates.
- Entities belonging to or related to Public Officials.
- Unions.
- Specific causes of the Company Employees.
- Private companies or social institutions with profit aims.
- Institutions or organizations where they have presence or direct responsibility, Employees, executives, director or shareholders of the Company, or Relatives or Friends of them.
- Communities, for the purpose of influencing community decisions in participatory processes in which the Company has a current, future or foreseeable interest (for example, communities that own territory in the process of indigenous consultation or similar).

### 5.4. Request and Delivery of Donations

The Requesting User, should submit to the Chief Finance Officer of the Subsidiary the duly filled out request of the Form of Donation Request (Annex A) along with the Documentation of the Donee, specified in Annex B), for its revision and validation *in situ*.

In case of complying with all the requirements and guidelines of this Policy, it shall be sent for final authorization and signing to the CEO of the Subsidiary.

The Chief Finance Officer of the Company should validate *in situ* the following elements:

- That the Donee exists really and legally.
- That the person requesting the Donation belongs to the Donee and is also empowered to perform such request through the revision of the act of incorporation and/or the powers-of-attorney and work credentials.
- That the requesting Donee is legally authorized to receive Donations, including the revision of the Directory of Authorized Donees issued by the Tax Administration Service, in case of Mexico or those listed and issued by competent organizations, according to the law applicable at every Subsidiary.
- That it complies with all the guidelines established in this Policy and with all the documentation requested in Annex B and that it is complete and correct.

# Donations Policy

## América Móvil



The Chief Finance Officer, once having validated the points mentioned in the previous guideline, must send to the Compliance Office the Form of Donation Request, duly filled out and signed.

The Compliance Office should review the information established in the Form of Donation Request and as the case may be, he/she must make the remarks or recommendations that are convenient.

Likewise, the Compliance Office should fill out the form of *Due Diligence* for Charity Institutions (Annex C) for the assessment and opinion whether the addressee is appropriate to receive the Donation based on the risks of Corruption and prevention of money laundering that may be identified.

Based on the recommendations issued by the Compliance Office and the validation of the Chief Finance Officer, the CEO of the Subsidiary must send the form of Donation Request to the CEO of América Móvil for its final authorization.

Once having gotten the authorization by the CEO, it must carry out all the administrative acts necessary to execute the Donation.

The Compliance Officer of América Móvil should write down a letter of Donation delivery in letterhead paper of the Company aimed to the beneficiary Donee, and it should contain all the information related to the Donation.

Any Donation should be communicated publicly by the media it considers, unless there is a provision that demands secrecy or confidentiality.

The Donee, upon receiving the Donation, should delivery, all duly filled out, the form of Certification of Compliance with Anticorruption Standard (Annex H); as well as to submit evidence that the goods were used for the established aims, in accordance with the provision in the general guidelines of this Policy.

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

- **Monetary Donation.**  
The Requesting User should submit the payment proposal to the Finance Direction of the Company, attaching as support, the form of Donation Request, duly reviewed and authorized (with signatures of the Chief Finance Officer, the Compliance Officer of América Móvil and of the CEO of the Subsidiary for programming the payment, and finally, send it to the Treasury of the Subsidiary for its application.
- **In-Kind Donation.**  
The Requesting User should get form the corresponding warehouse, the output document of the In-kind Donation by means of the Output of In-Kind Donation (Annex G), by attaching as support the form of Donation Request, duly reviewed and authorized (sign signatures of the Chief Finance Officer, the Compliance Officer of América Móvil and of the CEO of the Subsidiary).

# Donations Policy

## América Móvil



The Finance Direction of the Subsidiary shall be responsible for verifying the fiscal validity of the receipt delivered by the Donee.

The Manager of Internal Control or of Internal Audit of the Company or the person appointed by him/her, should collect a letter with receipt acknowledgement in letterhead paper of the Donee, which should comply with the following requirements and be accompanied by the following documents:

- Name and signature of the person receiving the Donation, who must be the legal representative of the donee.
- Delivery date of the Donation.
- In case of an in-kind Donation, a description of the goods that are delivered as Donation.
- In case of a Monetary Donation, a listing of the payment and the bank documents that accredit it.
- A tax-deductible receipt, according to the applicable tax law.
- A photocopy of the official ID of the legal representative of the Donee receiving the Donation.

Immediately after the Donation delivery, it must perform the accounting recording in the Company.

### 5.5. Control of Donees

The Compliance Office should integrate and maintain a database of the Donees, both of those that have been authorized to receive Donations from the Company, and of those that have been rejected.

In case of requesting a subsequent Donation or on later dates for the same Donee, the Requesting User should fill out again the Form of Donation Request and it shall ask the Compliance Office for the data and information that should be required again from the Donee to update the database and the file, and it shall inform if it is necessary to make a new report of *Due Diligence*.

The Compliance Office must keep the file of each of the Donees, which should contain at least, the following information:

- Corporate information collected during the request paperwork (Annex B).
- Form of Donation Request, duly signed and authorized.
- Form of Due Diligence for donees.

In case of having authorized the Donation:

- Form of Certification of Compliance with the Anticorruption Standard (Annex H).
- Delivery letter of donations with receipt acknowledgement.
- Copy of the banking transfer performed or check, as well as the account statement that shows the corresponding payment.





### 5.6. Due Diligence Process

For Monetary or in-kind donations higher in value to an amount of US\$10,000.00 (ten thousand U.S. Dollars 00/100) or its equivalent in local currency, the Finance Direction of the Subsidiary shall request the Compliance Office to carry out the background and reputational investigation (*Due Diligence*) of the donee.

*Due Diligence* should include an investigation on the following points:

- Incorporation date of the donee and corporate object.
- Identification of the work plan or document that justifies the need for the Donation.
- Evaluation of the historical consistency of the activities of the donee regarding its corporate object.
- Identification of the associates and executives of the requesting donee.
- Identification of the members of the board of directors, board, patronage, or any similar management organization.
- Investigation of politically exposed people (PEP 's, for its acronym in English), through the information sources listed in Annex D.

The investigation result should be recorded in the corresponding form of *Due Diligence* (Annex C).

If, as a result of the *Due Diligence* performed, any of the Red Flags of Corruption and Money Laundering is identified, from those detailed in Annex E, the Compliance Office should determine, based on the rating of the risk level, if these signals allow or not to continue with the authorization process of the donation or in its case, request the performing of pertinent legal actions.

The Compliance Office, once getting the approval of the Holder of the requesting area, should issue its findings by means of the form of Recommendation of the Compliance Officer (Annex F), which should include at least: the case background, the identified Red Flags, the analysis and considerations, as well as an approval conclusion or a recommendation of adjustment or of rejection.

In order to update and monitor the possible Red Flags of Corruption or of prevention of money laundering that may come out from the donee's investigation, the *Due Diligence* report shall have a valid term of 2 (*two*) years, so it must be done again if there is a new request, new relevant information that affects the decisions of granting or not the donation, or if considered necessary.

By the end of the year, the Compliance Office shall submit a final report of the donations granted to the CEO of América Móvil and to the Ethics Committee.



### **6. Supervision and Verification of the Policy Compliance**

The Audit and Corporate Practices Committee of the Board of Directors of América Móvil, through the Compliance Officer, is responsible for supervising, overseeing and, as applicable, auditing the due compliance of all provisions in this Policy, and periodically assessing its effectiveness.

The Compliance Office is also responsible for periodically evaluating its Integrity and Compliance Program which includes, among others, a series of measures that are aimed to prevent the acts of Corruption. Likewise, it is responsible for providing orientation to the Employees regarding this Policy, through the email account [yocumplo@americamovil.com](mailto:yocumplo@americamovil.com) along with the immediate bosses.

If it is necessary to carry out audits, they shall be done periodically and randomly to the different Company areas.

All the Company Employees must be committed to support and collaborate with the work teams in charge of doing such audits without hindering or obstructing the auditing processes and without providing false or incorrect information.

Remember that it is everyone's obligation to comply and make comply with the present Policy and report any act that is against it through the Portal of Complaints <https://denuncias.americamovil.com/>

### **7. Training and Release**

For us, it is very important to understand and put into practice what is described in this Policy, and in order to encourage a culture of transparency, ethics and values, América Móvil offers to its Employees and to the Third parties, on-line or in-person courses, which shall be released through the official means of communication of the Company in order to train them so that they can understand the concepts, scopes, situations, as well as to express the concerns that may happen on the day-to-day duties.

It is everyone's responsibility, of all of us who work at América Móvil or its Subsidiaries, to attend the assigned sessions, and comply with the times and the requested assessments.

### **8. Cooperation and Coordination**

The Compliance Office is responsible for generating and homologating, as much as possible, this Policy regarding the Subsidiaries. However, the Subsidiaries are those responsible for complying with the legal obligations applicable before the Authorities of each country.

Due to this, the Subsidiaries should have an internal procedure of standard compliance, considering the specific obligations of each country on topics of legality in Donations, as well as anticorruption and antibribery.



Likewise, the Subsidiaries must ensure that they have efficient mechanisms that allow them to cooperate and, as it corresponds, they must establish between them a coordination at internal level in the development and implementation of policies and activities to prevent acts of Corruption in general.

### 9. Penalties

Penalties due to the default of this Policy, both for the Employees and for the Third parties, may be of administrative, labor, or even criminal type, depending on the seriousness of the act and they shall be penalized in accordance with the internal regulation of work and/or of the applicable law.

At América Móvil, the Ethics Committee of each Subsidiary shall be the last instance in the determination of the penalty in case of default of this Policy, with no harm that such default may be penalized, additionally, by the applicable law and the competent authorities.

### 10. Portal of Complaints

In order to complain about any default to this Policy or to our Code of Ethics, we have available for you the Portal of Complaints at <https://denuncias.americamovil.com>.

You, just like each of the Employees of América Móvil and of the Third parties, are entitled and obliged to report directly to our hierarchical boss, to the Compliance Office, to the Compliance Office of the Subsidiary, or through the Portal of Complaints, any behavior that breaches this Policy or any law, regulation, Policy or internal procedure applicable and in general, any unethical behavior.

Likewise, it is our duty to cooperate with any internal or external investigation and keep its confidentiality. The Employees who make some false or intentional complaint may deserve disciplinary penalties.

Remember that not reporting a serious ethical fault may have disciplinary consequences for you, since you may be covering an unethical fact or a crime. It shall be possible to file anonymous complaints if the plaintiff wishes so, however, it is recommended to leave a contact for the investigation follow-up.

It is important to know that América Móvil has adopted all the reasonable and justified measures to protect the confidentiality of a complaint and of the plaintiff, and also guarantee at every moment that no kind of retaliation shall be taken against you for having filed the complaint.

Furthermore, it is important to make clear that no provision in this Policy shall be understood as an obstacle so that people may directly file complaints before the competent authorities. In such cases, it is recommended to notify our Legal Direction and/or a la Compliance Office so that, if necessary, it acts along with the corresponding authorities.

# Donations Policy

## América Móvil



---

All the complaints shall be supervised by the Compliance Office of América Móvil, who in turn, is liable to the Committee of Auditing and Corporate Practices of América Móvil.

The Compliance Office is the instance that is in charge of the supervision and operation of the email for complaints, and it shall send to the Ethics Committees of each Subsidiary, the corresponding complaints for its proper investigation.

### **11. Doubts and Comments**

Should you have any question related to this Policy or any comment or suggestion, write to us to the email [yocumpl@americamovil.com](mailto:yocumpl@americamovil.com)



### Annex A - Form of Donation Request

<b>Date:</b>			
<b>Mission of the organization:</b>			
<b>Main sources of funding of your organization</b> <i>Establish % according to the share.</i>	<b>In-kind</b>	Companies	
		Foundations	
		Private parties	
		Government	
	<b>Monetary</b>	Companies	
		Foundations	
		Private parties	
		Government	
<b>Have you received, before, any Donations from [name of the donor company]?</b>			
Yes__No____ If yes, please give detail of the Donation and date. _____			
<b>In case of receiving the Donation, do you commit yourself to deliver a report that shows the destination of resources?</b>			
Yes__No____ Specify the delivery time after the Donation. _____			

#### GENERAL INFORMATION OF THE ORGANIZATION

Corporate Name:		*Taxpayer's code:		*CLUNI:	
Address:					
Phone No.:					
Website / social networks:					
No. of original act of incorporation:		Notary No.:		Incorporation Date:	
Name of Legal representative:		Taxpayer's code:		CURP:	
Belongs to the public sector:					

*\*Please attach a copy of the documentation with a valid term no longer than 3 months.*

# Donations Policy

## América Móvil



GENERAL INFO OF THE CONTACT OF THE REQUESTING DONEE	
Full name:	
Job position:	
E-mail:	
Brief description of functions and experience:	

MEMBERS OF THE BOARD OF TRUSTEES AND/OR BOARD OF DIRECTORS		
#	Full name	Position in the organization, and if he/she belongs to or participates in another Donee, indicate the name
1		
2		
3		
4		

DATA OF THE DONATION		
<b>Justification of Donation:</b> It should respond to the following questions: What? What for? Why?		
<b>Just once:</b>	<b>Authorized program:</b>	
<b>Type of Donation:</b>		
<b>Destination/application of the Donation:</b>		
<b>Value of Donation (local currency):</b>		
<b>In case of being monetary, specify the payment method:</b>		



DATA TO RESPOND IN CASE THAT THE REQUESTING ENTITY IS FROM THE PUBLIC SECTOR		
#	Full name	Position in the organization, and if he/she belongs to or participates in another Donee, indicate the name
1		
2		
3		
4		

**REQUESTED BY**

**REVIEWED BY**

\_\_\_\_\_  
*[Name, position and signature of requestor]*

\_\_\_\_\_  
*Finance and Administration Director*

**REVIEWED BY**

**AUTHORIZED BY**

\_\_\_\_\_  
**Compliance Officer**

\_\_\_\_\_  
*[Name, position and signature]*



### **Annex B – Donee’s Required Documentation**

The following documentation shall be facilitated by the Requesting Donee in order to start the authorization paperwork of the Donation by the Company:

- Copy of the act of incorporation.
- Copy of the public deed that accredits the personality of the legal representative.
- Official ID of the legal representative.
- Certificate of registration at the tax authority or tax registration sheet.
- Address verification document\*.
- Copy of the last certificate, which informs that it keeps being an authorized Donee.
- Report of compliance of tax obligations (current month).
- Card of employer’s registration.
- Copy of front page of the bank account statement in the name of the donee, where you can see the account number or the CLABE account\*.

*\*The document should be submitted with a valid term no longer than three months since the date of request of the Donation.*





### Annex C - Form of *Due Diligence* of Donees

#### Background Report

<b>Date:</b>	
<b>Requesting Area:</b>	
<b>Executive summary</b>	
Brief summary of the transaction that originated the Due Diligence process.	
<b>Initial Information provided</b>	
Name of the Donee	
Contact Data	
Main activities	
Name of board members and key executives	
<b>Detail of findings</b>	
List of findings identified by means of the Due Diligence process.	
<b>Beneficiary Donee</b>	
<b>A. General Information</b>	Corporate Object.
<b>B. Relations with government</b>	
<b>C. Legal background (including penalties, fines and disabilities)</b>	
<b>D. Potentially adverse information</b>	



V. Annexes

--



### Annex D – Information sources for Due Diligence

An effective reputational and background investigation integrates databases and publications issued by different information sources which join in a single procedure a comprehensive verification:

1. Compliance databases (*Trace, World Compliance, World Check*).
2. Lists of those penalized and disabled by local, national and international organizations (*OFAC, World Bank*).
3. Blacklists and objectives of international action (*OFAC, Interpol, FBI, PGR*),
4. Search engines (*Google, Bing*).
5. News and communication media (Local, national and international information media).

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

Activity	Description	Items		Findings			
<b>a. Search of adverse notes</b>	<p>a) Search of electronic news and information of public domain, national and international, to verify if there are articles, notes or negative reports* that may affect the Company reputation</p> <p>* The revision should be at least for the last 2 years. Print the first four websites of the searches shown by the search engine.</p> <p>b) Confirm that the Donee has a Good reputation at the Embassy of the United States, the Consulate or other important regulatory authorities, as it corresponds. Print the first page of the searches shown by the engine.</p>	<input type="radio"/>	Donee	<input type="radio"/>	Yes	<input type="radio"/>	No
		<input type="radio"/>	Executive of the donee	<input type="radio"/>	Yes	<input type="radio"/>	No
		<input type="radio"/>	Board of directors	<input type="radio"/>	Yes	<input type="radio"/>	No
		<input type="radio"/>	Key Employees	<input type="radio"/>	Yes	<input type="radio"/>	No
		<input type="radio"/>	Executives or key Employees, PEP ( <i>Politically Exposed Person</i> , for its acronym in English)	<input type="radio"/>	Yes	<input type="radio"/>	No
		Search done on:					
		<input type="radio"/>	Internet	<input type="radio"/>	Yes	<input type="radio"/>	No
		<input type="radio"/>	Other media (specify)	<input type="radio"/>	Yes	<input type="radio"/>	No
		<input type="radio"/>	Embassy / Consulate of the United States	<input type="radio"/>	Yes	<input type="radio"/>	No
		<input type="radio"/>	Other regulatory authorities (specify)	<input type="radio"/>	Yes	<input type="radio"/>	No
		Search done on					
		<input type="radio"/>	Internet	<input type="radio"/>	Yes	<input type="radio"/>	No
		<input type="radio"/>	Other media (specify)	<input type="radio"/>	Yes	<input type="radio"/>	No

# Donations Policy

## América Móvil



Activity	Description	Items	Findings	
	Remarks:			
b. PEP/ Foreclosure /Surveillance Lists/ Blacklists	Revision of:	<input type="radio"/> List of penalized public officials  Licenses used: <input type="radio"/> World Compliance <input type="radio"/> World Check <input type="radio"/> Lexis Nexis <input type="radio"/> Dow Jones	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 regarding litigation, sentences, lawsuits, disputes, fines and penalties on criminal and tax matters of the laDonee.	Licenses used: World Compliance World Check Search on Criminal (P) and/ or Tax (F) matters:		
			Yes <input type="radio"/> No <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/>	
		Litigation	<input type="radio"/> P <input type="radio"/> F	Yes <input type="radio"/> No <input type="radio"/>
		Sentences	<input type="radio"/> P <input type="radio"/> F	Yes <input type="radio"/> No <input type="radio"/>
		Lawsuits	<input type="radio"/> P <input type="radio"/> F	Yes <input type="radio"/> No <input type="radio"/>
		Disputes	<input type="radio"/> P <input type="radio"/> F	Yes <input type="radio"/> No <input type="radio"/>
		Fines	<input type="radio"/> P <input type="radio"/> F	Yes <input type="radio"/> No <input type="radio"/>
		Penalties	<input type="radio"/> P <input type="radio"/> F	Yes <input type="radio"/> No <input type="radio"/>
Remarks:				

PREPARED BY

\_\_\_\_\_  
*[Name and signature of person who prepared]*

REVIEWED BY

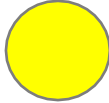
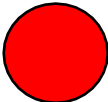
\_\_\_\_\_  
**Compliance Officer**



### Annex E – Red Flags of Corruption

As follows, there are the scenarios and behaviors that, in general, act as Red Flags that indicate the possibility of Corruption or a Bribery situation.

Likewise, this indicates the risk level that each scenario represents and how you should act when identifying it.

<b>Evaluate and issue a recommendation</b>	
<b>Yellow flags</b>	
	<ul style="list-style-type: none"><li>• That it is a governmental organization the one that requests the Donation.</li><li>• That it is public officials or its Relatives who are executives or members of the executive committee of the Donee.</li></ul>
<b>Do not proceed with the donation process</b>	
<b>Red Flags</b>	
	<ul style="list-style-type: none"><li>• Lack of clarity in the object of the Donee that requests the Donation.</li><li>• Denial of the Donee to release the names of the executives, or members of the board of directors of the Donee.</li><li>• Lack of documentation or incorrect information provided by the Donee.</li><li>• That the Donation is a condition for performing or expediting some paperwork before some authority.</li><li>• That the Donation is a condition to start or maintain a business relation.</li><li>• That there is adverse information (related to fraud and/or Corruption) of the Donee, its key executives or members of the board of directors.</li><li>• That the Donee, any of its key executives or members of the board of directors are listed at any of the blacklists.</li></ul>



---

**Annex F - Form of Recommendations of the Compliance Officer**

Requestor's name:
Donation:

<b>Background:</b>

<b>Critical Points:</b>

<b>Analysis and considerations:</b>

<b>Conclusions:</b>

---

**Compliance Officer**

---

*[Name of person who  
prepared]  
[Job position]*



### Fill-out instructions of the Form of Recommendation of Compliance

#### 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
- Incorporation date of the donee
- Corporate object of the donee
- List of the Donation with the corporate object of the donee
- Type of current relation between the Company and the donee
- The impact of the donation for the donee (value and condition of the donation)
- Motive of the donation

#### III. Critical Points:

- Flags and risk(s) of Corruption identified
- Default of some of the Company policies

#### IV. Analysis and considerations:

Consider the policies y procedures on matters of anticorruption and prevention of money laundering of the Company, as well as the risks that may be incurred in when approving of the Donation.

Give foundations in the response whether there is compliance or not with the criteria stated by the Company.

#### V. Conclusions:

- Donation is authorized/not authorized.



**Annex G - Form of Output of Goods – In-Kind donations**

Name of the Requesting User: \_\_\_\_\_

Date: \_\_\_\_\_

Position: \_\_\_\_\_ Area: \_\_\_\_\_

Ref.	Article Description	Unit	Amount

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>
--	--





### Annex H – Certification of Compliance with Anticorruption Standard

[Date]

By means of the following statement, the Treasury of **[Name of the Donee]** certifies that it receives in Donation **[Money, in-kind, service providing, or others (specify)]** the quantity of **[Quantity and description of the goods and services donated]** that I list below, and which were donated to us by the Company in order to **[Specify the Donation object]**.

Quantity	Measurement unit	Description	Check No. or wire transfer (if it applies)

(Attach the number of fields necessary)

Likewise, I declare under oath of telling the truth, that there are only the elements described that I have stated in the previous point, and that the goods delivered in Donation or the received money will not be commercialized or transferred to a Third Party or that shall not be used in contravention to the applicable laws.

The Donation shall be aimed only to the objectives of the corporate object of the party I represent; and I commit myself to send the information to the Company, which shows the good use of them, in accordance with the provision of Donation Policy of América Móvil.

Received,

---

**Autograph signature of the legal representative of the Donee**

**Name:** *[Full name]*