



**THIRD-PARTY DUE DILIGENCE PROTOCOL FOR
AMÉRICA MÓVIL, S.A.B. DE C.V. AND
SUBSIDIARIES**

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Third-Party Due Diligence Protocol

América Móvil



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1. Introduction

América Móvil, S.A.B. de C.V. and its subsidiaries (“América Móvil” or the “Company”), confirm and formalize their commitment to the values and ethical principles of the company, and to stopping illegal practices.

The Company also finds it relevant to note that the violation of any laws, rules or regulations in any country where América Móvil is present through its subsidiaries, may lead to civil and criminal penalties, ranging from fines to imprisonment.

For this reason, América Móvil has developed an Integrity and Compliance Program including, among other things, a Code of Ethics, several internal policies, and this Third-Party Due Diligence Protocol (the “Protocol”), to prevent and fight corruption and ensure compliance with all laws, rules and regulations applicable to the Company.

Nonetheless, we acknowledge that the Company’s daily operations and activities involve the provision and procurement of goods and services, and for such purposes the Company needs to interact with a wide range of Third Parties. These interactions may from time to time involve certain risks (for example, legal, reputational, tax, financial, etc.) derived from many factors and should be identified, analyzed, categorized and, if applicable, dealt with by the Company.

Therefore, América Móvil and its Subsidiaries only pursue and maintain commercial relationships with Third Parties that share and apply in their operations and commercial relations our commitment to ensuring full compliance with applicable laws, rules and regulations, observing the ethical principles that differentiate us. This Protocol, thus, helps us:

- To identify, analyze, assess and, if necessary, mitigate any risks the Company may face as a result of relationships with Suppliers, Distributors or, in general, Third Parties, with respect to the Compliance and observance of laws, rules and regulations in any matters included in América Móvil’s Integrity and Compliance Program, prior to entering an agreement or at the beginning of or throughout any relationship.
- To generate several benefits both for the Company and for Third-Party commercial relationships, such as:
 - Identifying the existence or absence of Red Flags or Relevant Findings regarding past performance contrary to the ethical principles that guide the Company;
 - Protecting the Company, and the Company’s shareholders, employees, administrators, investors and commercial partners, in the event of any contingency;
 - Creating and strengthening commercial ties based on ethical principles, which may lead to long-term relationships.

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2. Purpose

The purpose of this Protocol is to provide a general framework for the procedures to be followed by América Móvil and its Subsidiaries at the onboarding stage and/or to maintain any kind of relationships with Third Parties, conducting Due Diligence to avoid engaging with individuals or entities that may pose high risks to América Móvil or its Subsidiaries in matters included in América Móvil's Integrity and Compliance Program.

3. Scope

This Protocol is applicable to all Commercial Departments of the Company in all our lines of business, in all our Subsidiaries and in each of the countries in which we operate, which have under their functions and responsibilities the selection and contracting of any relationship with any Third Party, as well as for daily operations with them.

4. Definitions

Commercial Department: This means any Company department categorized as operational and responsible for the procurement of raw materials and services, which is in charge of selling, promoting and positioning the Company's products and services in the market, or any other division with direct contact with Third Parties, whether at onboarding or throughout the commercial relationship.

For purposes of this Protocol and the Terms of Reference, Commercial Department will be understood to include all areas which hire or have any kind of relationship with Third Parties, such as: marketing, advertising, sales, public relations, customer services, counsel, etc.

Conflict of Interest: This is a form of corruption where an action is unduly influenced by a personal interest or a connection with family or a Supplier. 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.

Certificate: This is the physical or digital document jointly issued and validated by the Authorized Assessor and the person giving the corresponding Recommendation, stating that a Third Party meets the requirements set forth in the policies of América Móvil, S.A.B. de C.V.

Contract: Agreement between two or more people to create and assign rights and obligations.

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.

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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 Suppliers, 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 or Assessment: Systematized research process focused on general elements and the background of an entity or an individual, shareholders or high management of companies, in order to identify, analyze, assess and, if necessary, mitigate, real or potential risks in connection with the matters included in América Móvil's Integrity and Compliance Program. This process is completed either before or after commercial relationships are established and/or a Contract is signed.

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

Authorized Assessor: Entity recognized by América Móvil's Compliance Officer that has demonstrated independency, competence and impartiality in the provision of Due Diligence facilitation services and has completed an internal Authorization process.

Family: Blood relatives up to the third degree. This means that sons, daughters, spouses, parents, grandparents, uncles, aunts, nieces, nephews and cousins shall be deemed close relatives.

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

Findings: Relevant documented information used to classify the risk rating of a Third Party derived from some unethical or illegal practice in accordance with América Móvil's Integrity and Compliance Program and applicable laws, rules and regulations.

Brokers: Individuals or entities acting on behalf of the Company; they complete operation or commercial activities. Brokers can include, for example: sales representatives, custom brokers, legal counsel, managers, distributors, consultants, lobbyists, accountants, etc. Also included are any persons interacting with Government entities or Civil Servants, acting on behalf of the Company.

Black List: Any list containing the names of individuals or entities linked to actions in violation of specific laws, rules or regulations, or to proceedings, judgments, claims, disputes, penalties and fines of any kind.

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Screening List: Lists of entities and individuals subject to sanctions or restrictions or wanted by national or international authorities. These lists are issued by government agencies, regulating bodies, and international organizations.

Risk Rating: This means the category (Low, Medium or High) in which the Third Party is grouped, based on the risk a business relationship with the Company may pose, in accordance with criteria issued by América Móvil's Compliance Officer.

Regional Compliance Officer. This area is responsible for implementing, monitoring and auditing the Integrity and Compliance Program of América Móvil, in a region where Subsidiaries of the Company are in operation.

América Móvil's Compliance Officer: This is the area of América Móvil responsible for implementing the Integrity and Compliance Program, including appropriate and efficient control, monitoring and audit policies and systems allowing the ongoing and periodic verification of compliance with integrity standards throughout the organization. To contact the Compliance Officer, use this email address: yocumpla@americamovil.com

Compliance Web Page or Microsite of América Móvil: Computing platform created or developed by América Móvil where Assessments or Due Diligence processes are completed, accessed via the following web address: www.complianceamx.com

PEP (Politically Exposed Person): These are individuals who hold or used to hold prominent public office, such as heads of state or government, high level politicians, high level government, judicial officials or military officers, high level executives of state-owned companies, officials of important political parties. The definition includes decentralized bodies, state-controlled entities, public trusts, autonomous bodies, and political 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/>

Integrity and Compliance Program: This means América Móvil's Code of Ethics and protocols and policies developed and 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.

Supplier(s): Any public or private individual or entity providing goods and/or services to the Company in furtherance of its operations and purposes, conforming the value chain of América Móvil, or representing the Company during interactions with another Supplier, a Government or Civil Servants.

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Recommendation: Final outcome of the Assessment Process issued by América Móvil's or the respective Regional Compliance Officer, showing the classification of a Third Party with the Company depending on the risk determined and resolving the positioning of a relationship with a Third Party, whether start, continue or stop it, and if applicable, providing an agreement to adhere to a Risk Management Plan.

Risk: This means the likelihood of an event not wanted by the Company happening, the consequences or impact of which may represent a threat and place the Company in a vulnerable position.

Screening: Investigating backgrounds in Black Lists and Screening Lists. For purposes of this Protocol and the Terms of Reference, it includes searches in digital databases deemed reliable by Regional Compliance Officers or by América Móvil's Compliance Officer.

Civil Servant (domestic/foreign): This is a person who holds a government position or is an Employee of a Government Body or any other decentralized government office or state-owned company, either by election or appointment, and may represent any level of Government, whether federal, national, state or municipal including, without limitation, lawmaking bodies, ministries or departments, judicial bodies agencies and organizations. It also includes members of political parties or candidates to any position of election. 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 involves offering, promising or giving, requesting or receiving some kind of improper benefit, in the form of a payment or otherwise, directly or indirectly to another person, with the expectation that the person receiving the benefit will provide or refrain from doing something in return to ensure an improper advantage, or obtaining or retaining business for a particular 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, or establish any kind of relationship with the Company.

Terms of Reference. This means the document called "Terms of Reference for Assessors", issued by América Móvil's Compliance Officer and establishing the rules governing the operation of the Assessment or Due Diligence system.



5. General Guidelines

All Third Parties must be subject to a Due Diligence process whereby an Authorized Assessor, the Company's Commercial Department or the corresponding Compliance Officer will assess them. Such process must be completed and documented in the Compliance web page or Microsite of América Móvil.

The Commercial Department shall verify that each Third Party establishing or continuing a commercial relationship has a positive Recommendation after completing the corresponding Due Diligence Process.

Any Due Diligence shall contain the following elements:

- Specify the relevant good(s) or service(s) the Third Party is giving or providing to the Company;
- Third Party identification and classification based on risk rating;
- Analysis and assessment of the relevant Third Party taking into consideration the risk rating that was determined;
- The corresponding Compliance Officer's conclusions and recommendations, based only on the findings included in the assessment file; and
- If applicable, the justified decision of the Commercial Department concerning a new relationship or the renewal of an existing relationship with the assessed Third Party, taking into consideration the Recommendation of the Compliance Officer.

As a general rule, every Third Party must be subject to the Due Diligence Procedure conducted by an Assessor Authorized by América Móvil's Compliance Officer, and if applicable, the cost of such assessment will be borne by the respective Third Party or prospect.

In specific cases duly justified by the Commercial Department and accepted by the respective Compliance Officer, the Due Diligence Process may be conducted internally.

If any Subsidiary has documented and conducts any Third-Party investigation, evaluation or analysis in such matters as contained in the Integrity and Compliance Program, such assessment must be replaced by the Due Diligence described in this Protocol and the Terms of Reference

If any Subsidiary conducts any type of investigation, assessment or analysis of a Third Party in matters other than those contained in the Integrity and Compliance Program of América Móvil, such Subsidiary will complete all actions necessary to ensure that both assessments are completed using one single procedure so that both objectives are fulfilled efficiently.

5.1. Relevant Activity Classification - Risk Rating

América Móvil and its Subsidiaries acknowledge that they interact with many Third Parties, each with different activities, and thus, a different risk rating determined, among other things, based on their nature, on the type of company, and location, type of goods or services provided, and the degree of compliance with various laws, rules and regulations, etc.

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In this sense, América Móvil and its Subsidiaries have determined that the most efficient option to identify and control the risk of being involved in the various relevant activities related to the Third Parties, is to classify the risk involved in each relevant activity. This classification is completed using the following categories:

- Low Risk;
- Medium Risk; and
- High Risk.

On the other hand, it should also be acknowledged that if relevant activities carried out by Third Parties are considered medium or high risk, it does not necessarily mean that a commercial relationship with them should not be established, continued or terminate, but that in such cases a more detailed assessment is necessary to analyze and implement mitigation measures, if any, that justify the new commercial relationship or the renewal or strengthening of an existing commercial relationship.

For any Third Parties with an existing business relationship with the Company at the time this Protocol or any of its amendments is issued, the Commercial Department will prepare jointly with the corresponding Compliance Officer and América Móvil's Compliance Officer a risk-based "Third-Party Due Diligence Implementation Program" to observe the methodology, categorization and selection of Third Parties whose relevant activity will be assessed, and the time period in which the Commercial Department will apply 100% the Due Diligence Protocol to the Third Parties it has relationships with.

A. Application, Information Analysis and Preliminary Risk Rating

In order to determine the risk rating, the Third Party must provide all necessary and sufficient information by filling out the following documents:

- The "Due Diligence Questionnaire" format, attached to the Terms of Reference as Appendix "A";
- The "Certificate of Compliance with Laws, Rules and Regulations" format attached to the Terms of Reference as Appendix "G".
- The "Letter of Declaration" format attached to the Terms of Reference as Appendix "H"; and
- The "Certification of Non-Conflict of Interest" format, attached to the Terms of Reference as Appendix "I".

All information provided by the Third Party will be used by the Assessor to determine the preliminary risk rating, taking into consideration the specific and approved criteria set by América Móvil's Compliance Officer based on the assessed topic.

B. Desk Research

Once the relevant activity carried out by a Third Party has been identified and a preliminary risk rating calculated, it is time to complete the Desk Research process in order to **i)** confirm all information collected and analyzed listed in the preceding paragraph; **ii)** run a search in various lists and supplement the outcome of the preliminary risk rating for each topic specified.

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To complete this research, the Assessor must use the methodology created by América Móvil's Compliance Officer for such purposes.

If necessary, the corresponding Compliance Officer may ask the Assessor to complete additional activities or inquiries to identify, clarify or analyze in more detail if there are or not Relevant Findings and, if applicable, have better elements to understand and determine the risk rating of a Third Party's activity.

The cost of any such additional activities or inquiries must be borne by the Assessed entity and, if the respective Third Party is not willing to bear the cost or be subject to the terms and conditions herein contained, América Móvil's Compliance Officer and/or the corresponding Compliance Officer, as well as the Commercial Department and, if applicable, the General Direction of the Subsidiary, will make a justified decision regarding the actions to be taken in that case.

Desk Research is the stage where the Assessor collects and analyzes publicly available commercial information on the Assessed entity in order to:

- Verify that it is a legally and physically existing entity;
- Identify the Final Beneficiary or Controller Beneficiary of the Third Party;
- Request references, background information and data on administrative or judicial proceedings that may suggest there is a potential risk for the Company, its shareholders, the Controller Beneficiary and the General Directors;
- Verify the existence, application and development stage of integrity programs, codes of ethics or codes of conduct in relevant topics, as well as Policies, put in place by the Third Party, and how they fit into América Móvil's Integrity and Compliance Program; and
- Be aware of the reputation the assessed entity has in the sector.

C. Determine Preliminary Risks

Once the preliminary risk rating is completed and the results of the Desk Research are available, the Assessor must prepare a "Third-Party Due Diligence Preliminary Report" with the purpose of calculating and justifying the level of risk of relevant activities at a preliminary stage, according to the following categories:

- Low Risk;
- Medium Risk; and
- High Risk.

Once the "Third-Party Preliminary Due Diligence Report" is issued, the Assessor will send it through the Microsite to the corresponding Compliance Officer so that the officer can make any appropriate comments, and to the relevant Commercial Department for information purposes.



5.2. Outcome of the Due Diligence Procedure

A. If there are **NO** Relevant Findings

If the Assessor determines in the “Third-Party Preliminary Due Diligence Report” that there are **NO** Relevant Findings and thus the Relevant Activity conducted is at Low Risk, the Assessor will issue a Preliminary Recommendation accordingly, in accordance with the procedure described in the Terms of Reference and send the Preliminary Recommendation to the corresponding Compliance Officer via the Microsite. The corresponding Commercial Department will have access at all times to this document.

If the corresponding Compliance Officer is OK with the information in and the implications of the documents mentioned in the preceding paragraph, this Compliance Officer will issue the Final Recommendation and ask the Assessor to prepare the “Certificate of Compliance” using the respective format attached to the Terms of Reference.

The Certificate must be signed at least by the legal representative of the Assessor conducting the Assessment procedure and the corresponding Compliance Officer authorizing it and be delivered to the Assessed entity.

Upon satisfactory completion of the Due Diligence procedure and granting of the necessary authorizations, the Commercial or Operations Department and Legal must ensure that the Contract to be entered with the Third Party includes compliance provisions as described in the Terms of Reference.

If there is any business or legal reason to justify the removal of the above-mentioned provisions, a document shall be prepared explaining the corresponding reasons and describing the measures adopted to manage the specific risk. This document must be signed by the Departments involved in the respective decision, including the relevant Compliance Officer, and filed with the Third Party’s file.

No commercial relationship will be created or renewed, nor orders or requests be made or services rendered to any Third Parties, unless such commercial relationship: **i)** is formally established by the execution of an agreement including the clauses specified in the preceding paragraph; and **ii)** the respective Certificate has been obtained following a Due Diligence Procedure.

B. If there **ARE** Relevant Findings

If the Assessor finds in the “Third-Party Preliminary Due Diligence Report” that there **ARE** Relevant Findings, and therefore the relevant activities carried out by the Assessed entity must be classified as MEDIUM or HIGH Risk, the Assessor must inform the corresponding Compliance Officer via the Microsite, in accordance with the procedure detailed in the Terms of Reference. The corresponding Commercial Department will have access at all times to this document.

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Once the corresponding Compliance Officer agrees to the content of such Report, the Assessor will give notice to the Assessed entity about the existence of such “Relevant Findings”, so that the Assessed entity can make any pertinent comments, clarifications or corrections, and provide such information as it may deem relevant.

Once the Assessed entity has made any such comments or clarifications or provided appropriate information, or if the Assessed entity fails to make any such comments within the period set forth in the Terms of Reference, the Assessor must issue the Preliminary Recommendation, in accordance with the procedure described in the Terms of Reference and send it to the corresponding Compliance Officer via the Microsite. The corresponding Commercial Department will have access at all times to this document.

The Compliance Officer will review the contents of the Preliminary Recommendation mentioned in the preceding paragraph and, if the Compliance Officer agrees with the information provided and the way it is written, the Compliance Officer shall prepare the corresponding Conclusions, duly justified, as a Recommendation in this sense:

- It is convenient to have a new relationship or renew an existing relationship with the Third Party; or
- It is convenient to have a new relationship or renew an existing relationship with the Third Party, adopting mitigation actions and, if applicable, proposing a Risk Management Plan; or otherwise,
- Any existing relationship must be suspended or the proposed new relationship must not be established.

If an additional Due Diligence procedure is necessary, it will be conducted by an Authorized Assessor, and the costs derived therefrom will be borne by the Third Party. If the Third Party is not willing to bear such costs or be subject to the terms and conditions herein contained, América Móvil’s Compliance Officer and/or the corresponding Compliance Officer, as well as the Commercial Department and, if applicable, the General Direction of the Subsidiary, will make a justified decision regarding the actions to be taken in that case.

If the corresponding Compliance Officer and the Commercial Department decide that a Risk Management Plan should be implemented to renew the existing relationship and mitigate the identified risk, the corresponding Compliance Officer will propose a “Risk Management Plan” and agree to its scope.

If the implementation or fulfilment of the respective Risk Management Plan involves a cost, the Third Party should bear such cost. If the Third Party is not willing to bear the cost or be subject to the terms and conditions herein contained, América Móvil’s Compliance Officer and/or the corresponding Compliance Officer, as well as the Commercial Department and, if applicable, the General Direction of the Subsidiary, will make justified decision regarding the actions to be taken in that case.

5.3. Preparing and Maintaining Files

The Commercial Department is responsible for ensuring that each Third Party entering a contract or having an existing commercial relationship with the Company has a file containing as a minimum the following updated information:



- i. The “Third-Party Preliminary Due Diligence Report”.
- ii. If applicable, the “Due Diligence Report. Third Party Comments”.
- iii. The “Compliance Officer Recommendation”.
- iv. A Certificate, duly signed by the corresponding Compliance Officer and the Legal Representative of the Assessing Company, stating that the corresponding Due Diligence procedure was completed and specifying its validity.
- v. If applicable, the Risk Management Plan.
- vi. If applicable, execution or completion of the Risk Management Plan.
- vii. The “Letter of Declaration”.
- viii. “Declaration of Non-Conflict of Interest”.
- ix. A copy of the Contract governing the relationship between the Company and the Third Party, including provisions to ensure compliance with applicable laws, rules and regulations, and if applicable, granting the right to audit Third Parties in order to verify compliance.

The file shall be kept throughout the business relationship and for 10 years more following termination thereof and may be stored electronically in América Móvil’s Compliance Page.

Third Party files are strictly confidential, in accordance with applicable laws, rules and regulations, so they should be appropriately safeguarded and their contents must not be disclosed.

5.4. Due Diligence Updates

The Due Diligence process and the Third-Party file must be updated according to the following criteria:

- For Low Risk Third Parties, the Commercial Department will complete updates every three (3) years or prior to the renewal, modification or novation of a Contract.
- For Medium or High Risk Third Parties, the Commercial Department will complete updates every year or prior to the renewal, modification or novation of a Contract.

In the event of any situation that in fact modifies or may modify the Risk Rating of a Third Party with which the Company has a business relationship, the Commercial Department will request a new Due Diligence process according to the Risk Rating identified, and both the reason to request the process and its outcome will be documented and added to the Third-Party file.

6. Protocol Compliance Supervision and Verification

The Audit and Corporate Practices Committee of the Board of Directors of América Móvil, through the Compliance Officer, will supervise, monitor and, if applicable, audit compliance with all provisions in this Protocol, and will conduct regular assessments to determine its effectiveness in order to make all necessary updates for its optimal operation.

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The Compliance Officer will also be responsible for the regular assessment of the Integrity and Compliance Program including, among other things, a series of measures seeking to prevent acts of Corruption.

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 share an obligation to observe and ensure compliance with this Protocol, and to report any action in violation thereof 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 generating and approving this Protocol, to the extent possible, with respect to the Subsidiaries. However, the Subsidiaries will be responsible for complying with applicable legal obligations before the Authorities of each individual country.

Therefore, Subsidiaries shall have in place internal compliance procedures fit for the specific obligations assumed in each country based on laws, rules and regulations applicable to their specific relationships with Suppliers and Third Parties according to their commercial regime and taking into account the particular risks faced and obligations imposed in each country.

In addition, Subsidiaries will ensure that they have efficient mechanisms allowing them to cooperate with others and, as applicable, coordinate internally to develop and implement Third-Party Due Diligence Protocols.

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9. Sanctions

Penalties imposed following any breach of this Protocol, both on Employees and Third Parties, may be of an administrative, labor or even criminal nature, depending on the severity of their actions, and will be punished in accordance with internal work rules and/or applicable laws, rules and regulations.

In América Móvil, the Ethics Committee of each Subsidiary shall be the last port of call to determine penalties in the event of breach of this Protocol, without prejudice to penalties under applicable laws and determined by authorities having jurisdiction being imposed.

10. Whistleblower Portal

To report any breach to this Protocol, visit the Whistleblower Portal in <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.

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 details for follow-up during the investigation.

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 complaints 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 supervising and operating the email code for reports, and will send to the Ethics Committees of each subsidiary the corresponding reports so that they can be investigated properly.

11. Questions and suggestions

For any question in connection with this Protocol, or comments or suggestions, please contact us in the following email address: yocumplo@americamovil.com