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Equality and Respect Policy

América Móvil



1. Introduction

América Móvil, S.A.B. de C.V. and its Subsidiaries (hereinafter referred to as “América Móvil” or the “Company”) confirm and ratify their commitment to business values and ethical principles, to equality and respect towards the dignity of people, as well as to eradicating discrimination, sexual harassment and bullying in the workplace.

América Móvil is committed to the principles of equal treatment and equal opportunity for men and women, based on merit and irrespective of their sexual orientation, marital status, age, disabilities, nationality or ethnic background, socioeconomic status or family situation. We strive to promote full personal and professional development, with an approach of prevention and zero tolerance of any behavior that demeans human dignity, including, without limitation, discrimination, bullying and sexual harassment.

We at América Móvil are convinced that people who work in a place where equality is encouraged, free of discrimination, bullying and sexual harassment, can better achieve their full professional potential and contribute to creating a harmonious environment in the workplace.

It is worth noting that people who have historically been discriminated due to their gender and/or have been victims of sexual violence are mostly women. Accordingly, this Equality and Access to a Harassment-free Workplace (the “Policy”) will explicitly integrate the gender perspective as a governing principle and use inclusive language. However, this shall not result in discrimination for any other reason, including sexual identity or orientation, being ignored, or in those instances where the victims of discrimination, bullying or sexual harassment are men being minimized, ignored or “invisibilized”.

América Móvil has developed an Integrity and Compliance Program that includes its Code of Ethics and this Policy, among others, to foster awareness that achieving substantive equality among people requires the active participation of all Employees and Third Parties involved in our value chain.

Any violation to the Code of Ethics, this Policy or any applicable laws, rules or regulations in connection with equality and harassment, even if the relevant behavior takes place beyond Mexican borders, will result in action taken in accordance with the procedures set forth in the Protocol for the Management of Harassment and Equality Cases (the “Protocol”) and any other protocols issued from time to time to ensure compliance with this Policy.

2. Purpose

The general purpose of this Policy is to establish governing principles and guidelines to promote, within América Móvil, an inclusive, non-discriminatory culture of respect and equality between men and women, where every contribution is valued and each person has access to a harmonious working environment, free from gender discrimination and from all forms of bullying and sexual harassment.

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It should be noted that we at América Móvil have adopted a principle of zero tolerance of bullying and sexual harassment, as well as any behavior that demeans human dignity. In line with this principle, any breach of this Policy will be investigated and the corresponding sanctions imposed in accordance with América Móvil's Integrity and Compliance Program and, if applicable, in accordance with applicable laws, rules and regulations.

In turn, the specific purpose of this Policy is to raise awareness, sensitize and inform our Employees and Third Parties who may, in their daily lives, behave or express themselves in a way that may be deemed contrary to equality and respect of all people; accordingly, this document provides guidelines that can be used as objective parameters to promote the efficient implementation of this Policy.

Please be aware that using in bad faith this Policy, the Protocol, the Whistleblower Portal, or any other tool to report or resolve cases with the purpose of damaging the reputation, honor and integrity of a person will also lead to sanctions in accordance with América Móvil's Integrity and Compliance Program and any applicable laws, rules and regulations.

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

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

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



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 across the organization; and (iv) managing the operation of the Whistleblower Portal and coordinating compliance training.

Protocol: This means the Protocol for the Management of Harassment and Equality Cases.

Respect: This is the quality of an individual that is able to acknowledge his/her own dignity and the dignity of the people around him/her, creating relations based on empathy, tolerance, receptivity, friendliness and good uses.

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.

Dignified Treatment: This value is the basis for any relationship between individuals, based on Respect and promoting peaceful, positive exchanges throughout time.

5. Policy Governing Principles

5.1 In Interpersonal Relationships

A. Equality and Non-Discrimination América Móvil recognizes the right of every person to equal and non-discriminatory treatment, without distinction in terms of exclusion, restriction or violence owing to ethnic origin, skin color, sex, gender, culture, age, physical or sensory disabilities, neurodivergence, social or economic condition, physical appearance, pregnancy, sexual orientation, gender identity, political affiliation, language, marital status, family situation, religion, or any other reason. Discrimination shall also mean misogyny, homophobia, transphobia, any type of xenophobia, racial segregation and antisemitism. All female and male employees of América Móvil, irrespective of their management level, are responsible for the prevention and elimination of any discriminatory treatment.



- B. Dignity of People:** This is a fundamental basic right that will guide our actions at all times with full respect for autonomy, the human rights of victims and the right to a life free of violence.
- C. Inclusion and Diversity:** América Móvil seeks to promote an inclusive and diverse culture in the workplace, offering equal opportunities based on merit, for the participation of groups that are traditionally discriminated against and underrepresented, with the view that inclusion of these groups enriches the workplace with varied proposals, initiatives, ideas and views that lead to increased innovation, creativity and productivity in the workplace.
- D. Gender Perspective:** América Móvil, through the respective Ethics Committees, will resolve all discrimination and harassment cases adopting a gender perspective, which term is understood as a methodology and a series of mechanisms used to identify, question and assess attempts to justify discrimination, inequality and exclusion against women based on the biological differences between males and females, and decide which steps should be taken to act upon gender factors and create conditions for change to advance towards gender equality. This principle seeks to show that the differences between men and women are not determined purely by biology, but also by cultural differences associated with human beings.
- E. Accessibility:** This Policy, the Protocol, and any other information related to them, shall be accessible to all Employees and Third Parties in the value chain of América Móvil.

5.2 In Investigation Procedures

- A. Good faith:** Victims will be presumed to act in good faith, and help of all kinds will be provided to people requiring it, with full respect and allowing them to effectively exercise their rights.
- B. Transparency:** All steps under this Policy will be taken ensuring that all persons involved have access to necessary information and the corresponding follow-up is provided.
- C. Impartiality:** Any person involved in the procedures, steps and mechanisms described in the Protocol will act with complete impartiality and honesty even if this person represents any kind of conflict of interest.
- D. No revictimization:** No one can make worse the suffering of a victim or treat the victim with suspicion or as if the victim were responsible for the situation leading to a claim.
- E. Confidentiality:** Procedures related to this Policy and the Protocol will be kept and treated as confidential by the person in charge of the investigation and resolution. All actions will be taken based on complete confidentiality.



6. General Guidelines

This Policy sets forth the terms and conditions to ensure that all Employees of América Móvil and its Subsidiaries, as well as Third Parties in our value chain, enjoy an environment of equality, free of harassment, pursuant to the following guidelines:

- Equal opportunities for all Employees and Third Parties;
- Dignified Treatment to all Employees and Third Parties;
- No discrimination by reason of ethnic origin, nationality, skin color, sex, gender, culture, age, physical or sensory disabilities, neurodivergence, social or economic condition, general health, physical appearance, pregnancy, sexual orientation, gender identity, political affiliation, language, marital status, family situation, religion, or any other reason;
- Prevention of discrimination, bullying or sexual harassment behavior; and
- Reconciliation between people that think they have been treated in any way that may be deemed in violation of this Policy and/or the Protocol.

While priority will be given to training, sensitization and prevention, we maintain a zero-tolerance approach to bullying and sexual harassment, as well as any behavior that demeans human dignity, and accordingly:

- A complaint must be submitted in connection with any behavior that may be deemed bullying or sexual harassment, or to demean human dignity, through América Móvil's Whistleblower Portal, so that it can be investigated and the respective sanction imposed, if applicable.
- Complaints in connection with behaviors that may be deemed bullying, harassment or discrimination will not lead to any kind of retaliation. If necessary, appropriate legal protection must be provided.
- If applicable, all necessary cautionary measures may be adopted to protect the physical, psychological and emotional security of any persons Identified as victims, ensuring at all times that no revictimization occurs.
- All investigations in connection with purported violations of this Policy must be conducted promptly, in accordance with the rules described in the Protocol.
- All investigations will be conducted in accordance with "Due Process", i.e. ensuring and taking care that the following principles are observed always:



- Full guarantee of hearing and defense;
 - Investigations must be exhaustive;
 - Confidential;
 - Impartial;
 - Supportive;
 - Transparent;
 - With presumption of innocence;
 - Based on the dignity of people.
- All procedures must have a resolution. If any disciplinary measures or sanctions are necessary, they will be imposed proportionally, and any resolution directing such measures or sanctions must provide an explanation including specific reasons.
 - Whenever possible, efforts will be made to restore or create harmonious work relationships between any person in violation of these guidelines whose employment is not terminated, and the person(s) affected by the respective behavior.

However, América Móvil or the relevant Subsidiary will take all steps available to provide support and specific help to the persons that may be experiencing have experienced discrimination, bullying or sexual harassment, appointing one person and/or a list of people with the necessary skills and background for such purpose.

In this sense, a reconciliation will not be proposed if, following an analysis, it is determined that there is a disproportionate management relationship between the parties involved that may prevent equality between them.

6.1 Responsibilities

It is the responsibility of all Employees at América Móvil, especially those in positions of authority, and of any Third Parties in our value chain:

- To refrain from any actions, behaviors or attitudes that may be offensive, discriminatory, humiliating, degrading, unpleasant, hostile or intimidating, sexual in nature, or that may have sexual connotations.
- To refrain from ignoring, tolerating or allowing behaviors or situations contrary to the guidelines established in this Policy and the Protocol to continue or get worse; on the contrary, they must support any person that may be affected by a behavior characterized as bullying, humiliation or harassment. Any action contrary to the guidelines provided in this paragraph will be deemed a cover-up.
- To inform and/or request the support of the Compliance Officer and/or the Compliance Office of Subsidiary, as applicable, whenever they become aware of or witness any behaviors or situations contrary to the guidelines in this Policy and the Protocol; or report such behaviors through the Whistleblower Portal of América Móvil: <https://denuncias.americamovil.com/>



7. Policy Compliance Oversight and Verification

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 Officer is also responsible for evaluating periodically the Integrity and Compliance Program which includes, among other things, a series of measures intended to stop actions against equality or that may be deemed bullying or harassment. It is also responsible for providing guidance to Employees regarding this Policy, via this email address yocumpla@americamovil.com, along with line managers.

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

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

Remember that we all must comply and ensure compliance with this Policy and report any act contrary to it, through the Whistleblower Portal <https://denuncias.americamovil.com/>

8. Training and Dissemination

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

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

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

9. Cooperation and Coordination

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

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Accordingly, Subsidiaries should have a legal compliance internal procedure adapted to specific obligations in each country.

Furthermore, the Subsidiaries must ensure they have in place efficient mechanisms that may allow them to cooperate and, if applicable, coordinate internal efforts to develop and implement policies and activities designed to prevent actions in detriment of equality or constituting bullying or harassment.

10. 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.

11. Whistleblower Portal

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

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

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

Remember that failure to report a serious breach of ethics can have disciplinary consequences for you, since you may be concealing an unethical or criminal act. Reports can be made anonymously if the person filing the report wishes to do so; however, we encourage informants to leave some contact details for follow-up during the investigation.

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

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Likewise, it is important to make it clear that no provision in this Policy shall be understood to prevent people from directly filing complaints before any authority having jurisdiction. In such cases, our suggestion is that it should be reported to 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 the supervision and operation of the Whistleblower Portal and will send to the Ethics Committees of each Subsidiary the corresponding complaints, for their proper investigation.

12. Questions and Comments

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