

Our Compliance Division is comprised by a multidisciplinary team of professionals from different fields and areas of our organization, including legal, operations, auditing, information technology, among others, to integrate a strategic, independent, and high-level area in charge of the Integrity and Compliance Program (ICP). Our Compliance Officer reports to Senior Management and the Audit and Corporate Practices Committee of the Board of Directors and works on three main pillars: prevention, detection, and mitigation of risks in all operations.

Our Integrity and Compliance Program (ICP), has our [Code of Ethics](#) as its foundation, highlighting the ethical principles that govern our business and promote, among other things:

- Honest and ethical conduct;
- full, fair, accurate, timely, and understandable disclosure in reports and documents that we file with different authorities;
- compliance with applicable government laws, rules, and regulations; and,
- the prompt internal reporting of violations of the Code of Ethics and the employees' accountability for adherence to the Code.

The Integrity and Compliance Program and our Code of Ethics apply to all our officers, senior management, directors, permanent employees (including part-time) and contractors, the Company's supply chain, and/or other business partners.

To ensure its correct implementation, we:

- I. Develop policies and other Company guidelines to comply with current legislation.
- II. Identify, prevent, and mitigate operational and legal risks to ensure the Company's long-term reputational value and generate greater certainty to its value chain.
- III. Establish proper and effective control, monitoring, and auditing systems, to examine compliance with integrity standards throughout the whole organization at least once every two years.
- IV. Provide a confidential [Whistleblower Portal](#) that allows anonymity and legal protection.
- V. Develop training on compliance issues.

To strengthen our Governance in 2021, the senior management appointed local Compliance Officers with defined responsibilities in each of the countries where we operate, reporting to both, the CEO of each subsidiary and the Chief Compliance Officer of América Móvil.

The Audit and Corporate Practices Committee is the highest executive body responsible for supervising risk management, business ethics, and corruption issues within the Group. América Móvil's Chief Compliance Officer reports to the Committee almost at every board meetings (5 times a year) and to the Senior Management on a regular basis.

In accordance with América Móvil's Integrity and Compliance Program, we act based on our values as an essential part of our culture of ethics and integrity. Our Code of Ethics is the basis of the Integrity and Compliance Program, it governs our daily actions and is present in the decision-making process. It also establishes the following obligations for each América Móvil employee: read and

adhere to the Code of Ethics, comply with its principles, behave in an ethical manner, and report any illegal act or breach of the Integrity and Compliance Program through the Whistleblower Portal, without fear of reprisal.

In our [Whistleblower Portal](#), third parties and other business partners can also submit their complaints.

A fundamental component of the Integrity and Compliance Program is training. We provide training on ethical standards to all our employees, contractors, and Third Parties within our value chain, through the online education platform Capacítate Carso / Capacítate Aliados. The online courses “Code of Ethics” and “Effective Control of Corruption”, include practical cases related to these topics.

To date, more than 99% of our permanent employees (including part-time and contractors) have completed the “Code of Ethics” course and more than 90% the “Effective Control of Corruption” course. Furthermore, this year we provided courses related to the Protection of Personal Data and Information Security, as well as Prevention of Money Laundering to our employees and allies. Additionally, through the Capacítate Aliados platform we have trained 51% of our value chain.

Our Whistleblower Portal is a tool that allows us to consolidate all complaints in any of our operations. All complaints received on the América Móvil Whistleblower Portal are managed confidentially and investigated by the Compliance Office of América Móvil and each subsidiary, who, in turn, reports to a multidisciplinary group of Company officials that comprise the respective Ethics Committees. To learn more about our Whistleblower Portal and the investigation process please go to [Whistleblower Portal](#).

To expedite the dissemination and management of the Integrity and Compliance Program, the “América Móvil Compliance Portal” launched in the second semester of 2021, can be accessed by both employees and third parties that are part of our value chain.