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### 1. Introduction

We at América Móvil are aware that giving or receiving Gifts, Hospitality or Entertainment Expenses is important to build work relationships with Third Parties, including Civil Servants. In many countries where we have operations, these even are widely accepted practices.

However, these practices may be interpreted as acts of Corruption if they are used as an incentive to influence a decision or obtain an undue or illegal benefit, and thus, can constitute a breach of anti-corruption laws; therefore, all Employees and Third Parties at América Móvil must strictly comply with applicable laws, rules and regulations and observe the terms and conditions of this Policy and other applicable Company policies.

### 2. Purpose

The purpose of this Policy is to make you and all Employees of América Móvil and its Subsidiaries, as well as the Third parties we interact with, aware of the principles and conditions to give and/or receive Gifts, Entertainment and Hospitality Expenses, to avoid actions that may be interpreted as acts of Corruption and, consequently, pose legal and/or reputational risks to the Company.

### 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, other than family, with whom the Employee has a personal relation or some kind of affinity, including 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 generally applicable to all Employees and Third Parties, as well as any other person related to the Companies of América Móvil.

**Competitor:** Any company that participates in the same or a similar business sector to that of América Móvil and its Subsidiaries.

**Conflict(s) of Interest:** This is a form of Corruption that consists of an action that may be unduly influenced by some personal, family or third-party interest. A conflict of interest arises when the decisions or actions of an Employee or a Third Party are based on the Employee's or Third Party'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.

# Gifts, Entertainment and Hospitality Policy

## América Móvil



**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. 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 Third Party 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 Third Parties, 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.

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

**Requesting Employee:** Any Employee that may require the approval of Gifts, Entertainment or Hospitality Expenses for Third Parties.

**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.

**Entertainment Expenses:** Sports, musical or cultural events such as tournaments, fairs, theater plays or concerts, among others.

**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.

**Hospitality:** Expenses with the purpose of strengthening a business relationship (payment of flights, transportation, hotels, business meals, courses, conferences, congresses or seminars, among others) with Third Parties or Civil Servants.

**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](mailto:yocumplo@americamovil.com)

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

**Individual(s):** This means any person other than a Civil Servant.

**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 throughout the organization; and (iv) managing operations of the Whistleblower Portal and coordinate training in compliance.

**Gift:** Any Thing of Value or benefit delivered to a person as a sign of appreciation, esteem or friendship (Christmas gifts, promotional merchandise, among others).

**Civil Servant (domestic/foreign):** This is a person who holds a government position or is an Employee at a Government entity or any other decentralized government office, either by election or appointment, and may represent any level of the , federal, national, state or municipal Government including, without limitation, the congress, ministries, judicial bodies, research 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 consists of offering, promising or granting ,as well as demanding or accepting any benefit, either in cash or in kind, directly or indirectly to other person, to get that person to do or refrain from doing something to ensure an undue advantage, or to secure, lead or retain business for a specific 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. This includes civil society organizations and education, charitable, cultural or sports institutions.

## 5. General Guidelines

We at América Móvil are convinced that our experience, the quality of our services, the professionalism of our Employees and our entrepreneurial creativity are our best assets in establishing commercial and business relationships.

If, under extraordinary circumstances, giving or receiving a Gift or Entertainment or Hospitality Expenses is necessary, you should follow the principles listed below.

### 5.1. General Guiding Principles

- Gifts, Entertainment or Hospitality Expenses must not be given with the intention or purpose of influencing in any manner whatsoever, inappropriately or illegally, a Civil Servant or Third Party.
- They must be appropriate and of reasonable value.



- They must be given or received openly and transparently.
- They must be given or received in good faith and without expecting reciprocity of any kind.
- They must be given or received within the context of a legitimate business relationship and in good faith.
- They must be given or received in connection with a special occasion or specific event.
- They must not be given or received regularly or frequently.
- They should comply with local laws applicable to each Subsidiary.
- Giving or offering, directly or indirectly, any Thing of Value to Civil Servants or Third Parties in order to be favored with or maintain some business, to negatively affect a competitor or other Third Party, or to secure any kind of illegal or undue benefit or advantage for the Company, for a Relative, a Friend, or for you as an Employee, is expressly forbidden.
- Directly or indirectly receiving any Thing of Value from Civil Servants or Third Parties in order to give or facilitate a business, to negatively affect a competitor or other Third Party, or to secure any kind of benefit or illegal or undue advantage for such Civil Servant or Third Party, is expressly forbidden.

### 5.2. Guiding Principles for accepting or giving Gifts

- Offering, promising, giving or accepting Gifts to or from Civil Servants, directly or indirectly through Third Parties, Relatives or Friends, is forbidden.
- Likewise, Employees of América Móvil must not accept Gifts from Civil Servants or Third Parties, either directly or indirectly through Relatives or Friends.
- If, due to extraordinary circumstances, a Requesting Employee needs to offer, give or accept Gifts to or from Third Parties or Civil Servants, the Employee must comply with the following requirements:
  - The commercial value of the Gift should not be in excess of fifty U.S. Dollars (US\$50.00) or its equivalent in local legal currency at the address of the Subsidiary.
  - Such Gifts must not be luxurious (for example: jewels, watches, real estate, the use or enjoyment of real estate properties, vehicles, etcetera).  
Gifts must not be made in cash or any means of monetary transaction, as well as other means to store monetary value (for example, prepaid cards, service cards, department store gift cards, etcetera).
  - Gifts must not be given or accepted frequently or repeatedly.

### 5.3. Guiding Principles for accepting or giving Entertainment Expenses

If, due to extraordinary circumstances, a Requesting Employee needs to offer, give or accept Entertainment Expenses to or from Third parties or Civil Servants, the Employee must comply with the following requirements:



- The Requesting Employee and the Civil Servant or Third Party that was invited must attend the event together, and they must NOT discuss, refer to or imply, either before, during or after the event, any business matter in connection with the Company.
- Under no circumstances shall cash be given to pay for Entertainment Expenses. Expenses must be paid in kind; this is, through physical or electronic tickets, access codes, or any other mode of access to the event, but never through a means to store monetary value (for example, prepaid cards, service cards, department store gift cards, etcetera).
- If attendance to the event requires paying for plane tickets, accommodation and meals, these items shall not exceed the following amounts:
  - Flight ticket. The commercial value of a plane ticket with a commercial airline.
  - Daily accommodation. Accommodation expenses should not exceed two hundred and forty U.S. Dollars (US\$240.00) or its equivalent in local legal currency at the address of the Subsidiary.
  - Daily meals. Meal expenses should not exceed ninety U.S. Dollars (US\$90.00) or its equivalent in local legal currency at the address of the Subsidiary.
  - The travel cannot include unreasonable expenses or include unrelated expenses (for example, tourism or leisure visits, among others).
- The events should preferably be those sponsored by the Company.
- Access to events should not be given to or received from the same individual, or to his/her Relatives or Friends, frequently or repeatedly.
- Invitations are personal and non-transferable and should not include Friends and/or Relatives.

#### **5.4. Guiding Principles for accepting or giving Hospitality Expenses**

If, due to extraordinary circumstances, a Requesting Employee needs to offer, give or accept Hospitality to or from Civil Servants or Third Parties, the Employee must comply with the following requirements:

- The Requesting Employee and the Civil Servant or Third Party that was invited must attend the event together, and they must NOT discuss, refer to or imply, either before, during or after the event, any business matter in connection with the Company.
- Under no circumstances shall cash be given to pay for Hospitality expenses.
- If Hospitality includes plane tickets, accommodation and meals, these items shall not exceed the following amounts:
  - Flight ticket. The commercial value of a plane ticket with a commercial airline.
  - Daily accommodation. Accommodation expenses should not exceed two hundred and forty U.S. Dollars (US\$240.00) or its equivalent in local legal currency at the address of the Subsidiary.
  - Daily meals. Meal expenses should not exceed ninety U.S. Dollars (US\$90.00) or its equivalent in local legal currency at the address of the Subsidiary.



- Hospitality expenses cannot include any unreasonable expenses or include unrelated expenses (for example, tourism or leisure visits, among others).
- If Hospitality involves a business meal, its cost shall not exceed fifty U.S. Dollars (US\$50.00) or its equivalent in local legal currency at the address of the Subsidiary. If the amount is higher, it should be divided and paid in equal parts by those attending the meal.
- Hospitalities should not be given to or received from the same individual, or the individual's Relatives or Friends, frequently or repeatedly.
- Invitations are personal and non-transferable, and should not include Friends and/or Relatives.

### **5.5. Gifts, Entertainment Expenses or Hospitality Approval**

- The Requesting Employee will fill out the Gifts or Entertainment Expenses Approval Format (Appendix A), which must be approved and authorized by the Employee's line manager and by the Compliance Officer of the Subsidiary.
- If the Gift or Entertainment Expenses are approved, the Requesting Employee must include in the description of the expenses, the full name of the Civil Servant or Third Party, title and company or government body that it represents, and the justification for the Gift or Expenses.
- To request Hospitality Expenses, the Requesting Employee must fill out the Hospitality Expenses Approval Format (Appendix B), describing in detail the justification, including the reason for the business and the people benefited from Hospitality. Such format must be approved and authorized by the line manager, as well as by the Compliance Officer of the Subsidiary.
- The Subsidiary's Finance department will be responsible for recording clearly, accurately and transparently the expenses for Gifts, Entertainment Expenses or Hospitality, in the Company's accounting books.
- The Compliance Officer and the Compliance Officer of the Subsidiary are responsible for keeping control of all the records of Gifts or Entertainment Expenses.

### **5.6. Receiving Gifts, Entertainment Expenses and Hospitality**

- Gifts should be accepted in a visible way at the reception in the Company offices. If delivered by courier, the parcel must bear the name of the person and the company sending the Gift, the date, and the beneficiary.
- The Requesting Employee is responsible for verifying that Gifts or Entertainment Expenses have been received, documenting in the Evidence of Delivery of Gifts or Entertainment Expenses Format (Appendix C), and submitting it to the Compliance Officer of the Subsidiary.
- If you are not sure if Gifts or Entertainment Expenses offered are of the allowed value, or if they comply with the guidelines established in this Policy, contact the Compliance Officer in the e-mail address [yocumplo@americamovil.com](mailto:yocumplo@americamovil.com)





- If an Employee receives from a Civil Servant or from a Third Party a Gift or a Thing of Value the cost of which is higher than the nominal value permitted, it should be returned immediately using the format provided in Appendix D, and a copy will be submitted to the Compliance Officer of the Subsidiary.

#### 5.7. Accounting Records

The Finance department of the Subsidiary shall be responsible for keeping an internal control system to ensure that the accounting and financial records are accurate, complete, transparent and traceable, in accordance with local and international accounting standards.

Keeping accurate information reflects on the good reputation and credibility of the Company and ensures compliance of our legal and regulatory obligations.

The Finance department of the Subsidiary is responsible for ensuring that Gifts, Entertainment and Hospitality Expenses are duly recorded and documented with enough detail in books and other accounting records.

All activities conducted to alter, forge, destroy, hide or modify accounting records, confidential information, invoices, contracts, tickets or any other evidence or supporting documents are considered unacceptable and they must be penalized according to valid laws and/or América Móvil's internal policies.

#### 6. 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 prevent acts of Corruption. It is also responsible for providing guidance to Employees regarding this Policy, via this email address [yocumplo@americamovil.com](mailto:yocumplo@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/>.





### **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.

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.

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

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

Accordingly, Subsidiaries must have an internal procedure to ensure legal compliance considering the specific rules to accept and offer Gifts, Entertainment Expenses and Hospitality, and anti-corruption and anti-bribery obligations, in each country.

Furthermore, Subsidiaries shall ensure that they have in place efficient mechanisms that may allow them to cooperate and, as applicable, coordinate internal efforts to develop and implement policies and activities designed to prevent acts of Corruption in general.

### **9. 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.



#### 10. 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 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 failures to report a serious breach of ethics may have disciplinary consequences, as you may be covering up an unethical act or a crime. 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.

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 reports 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.

#### 11. Questions and Comments

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



**Appendix A – Gifts and Entertainment Expenses Approval Format**

	<b>Date</b>	[00 Month 0000]
<b>End Beneficiary:</b> <input type="checkbox"/> Civil Servant <input type="checkbox"/> Individual <input type="checkbox"/> Employee		
Name of beneficiary(beneficiaries): _____		
Name of Company or institution they represent: _____		
Title or role: _____		

**Reason for Gift / Entertainment Expenses:**

Brief description of reason or justification for the Gift

**Description and Cost:**

\_\_\_\_\_  
[Name, signature and  
title of requesting  
employee]

\_\_\_\_\_  
[Name, signature and title  
of line manager]

\_\_\_\_\_  
Compliance Officer  
[Name and Signature]



**Appendix B – Hospitality Expenses Approval Format**

<b>Date:</b>	
<b>Beneficiary:</b> <input type="checkbox"/> Civil Servant <input type="checkbox"/> Customers or Suppliers Name of Beneficiary: _____  Name of Company or institution they represent:   Title or role: _____	

**Reason for Hospitality:**

*[Brief description of travel expenses, Hospitality or Entertainment Expenses including business reasons]*

**Description and Cost of Hospitality:**

\_\_\_\_\_  
**[Name, signature and title of requesting employee]**

\_\_\_\_\_  
**[Name, signature and title of line manager]**

\_\_\_\_\_  
**Compliance Officer**  
***[Name and signature]***





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**Appendix D – No Gifts Letter**

*[Date]*

Subject: Gift Acceptance Policy

*[Name]*  
*[Company]*  
*[Address]*

In the business world, we know that it is usual for Companies to show appreciation by giving different kinds of Gifts, particularly at Christmas. América Móvil appreciates these tokens, which we understand to express that the commercial relation with us is valued.

However, we would kindly request that, in the future, you refrain from giving our Employees Gifts of any kind paid by **[Company name]**, or sent by an employee of such company as a personal gift.

This request is applicable to all Employees and business units of América Móvil. This request is based on our **Gifts, Entertainment and Hospitality Policy** and the good practices that regulate our Company, which may be viewed in the portal of América Móvil.

Name of individual or Company name

Thank you for your courtesy.

Sincerely,

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**[Name and title of the receiving employee]**