



**HUMAN RIGHTS DUE DILIGENCE PROTOCOL FOR  
AMÉRICA MÓVIL, S.A.B. DE C.V. AND  
SUBSIDIARIES**



---

### Contents

1. Introduction.....	3
2. Purpose .....	3
3. Scope .....	4
4. Definitions.....	4
5. Human Rights Due Diligence Process .....	5
5.1. Identifying Adverse Impacts.....	6
5.2. Assessing Adverse Impacts.....	9
5.3. Impact Management.....	10
5.4. Tracking.....	12
5.5. Communication.....	13
6. Periodic Due Diligence.....	13
7. Governance.....	13
8. Protocol Compliance Supervision and Verification .....	14
9. Training and Dissemination .....	14
10. Cooperation and Coordination .....	14
11. Sanctions.....	15
12. Whistleblower Portal .....	15
13. Questions and Comments .....	16
Appendix 1. Internationally Recognized Human Rights.....	17
Appendix 2. Human Rights Impact Assessment Matrix .....	19
Appendix 3. Human Rights Action Plan Format .....	20



### 1. Introduction

We at América Móvil, S.A.B. de C.V. and its Subsidiaries (“América Móvil” or the “Company”) are convinced that respecting Human Rights is crucial in all our activities. Therefore, we have pledged to uphold Human Rights through our Code of Ethics and Human Rights Policy, which set a framework applicable to our activities and to the Third Parties we deal with, in accordance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprise on Responsible Business Conduct.

Internationally, Human Rights Due Diligence has been described as a way to manage Adverse Human Rights Impacts with which enterprises are involved. This concept is defined as the ongoing management process a prudent and reasonable company must carry out to understand the impacts that it may have on Human Rights through its activities, and taking appropriate action based on its specific circumstances such as sector, context of activities and size, among other factors. Human Rights Due Diligence is an ongoing process involving assessments conducted periodically, every time the business model is amended, and following significant changes in the Company’s processes or activities. Thus, Human Rights Due Diligence is a key tool in corporate culture.

We at América Móvil show that we are committed to the respect of Human Rights by completing the Human Rights Due Diligence Procedure described herein in accordance with the highest international standards. In this sense, it is crucial that all members of América Móvil assess in full the impact their activities and decision-making processes may have on Human Rights, so that they take all necessary steps to prevent or correct them.

### 2. Purpose

The purpose of this document is to provide guidelines for the implementation of a Human Rights Due Diligence procedure in the Company’s operations, covering applicable activities and projects.

This protocol describes Human Rights Due Diligence as a process to identify, assess, prevent, mitigate or repair adverse impacts on the Human Rights of people, and to monitor and communicate the performance of Subsidiaries in this matter. Accordingly, it has been prepared to support the Company’s decision-making process around Human Rights.

Human Rights Due Diligence follows an approach based on risks to people, so each potential impact has to be assessed for its Severity for people who may be affected, irrespective of any Compliance Risk to the Company. This characteristic includes Stakeholder engagement and dialogue as a transversal element, to ensure impacts are better understood and prevented or mitigated.

With the Human Rights Due Diligence procedure, the Company fulfills its promises contained in the Code of Ethics and América Móvil’s Human Rights Policy, and meets international expectations on responsible business conduct. This protocol provides tools to design and document steps taken to ensure that all Business Units or Subsidiaries incorporate Human Rights in their daily operations.



### 3. Scope

This Protocol is applicable to América Móvil and all business lines in all our Subsidiaries, and in every country where we operate; therefore, it is important to be aware of, understand and put into practice the principles and values contained herein.

### 4. Definitions

**Action Plan:** Set of steps designed in response to Adverse Human Rights Impacts.

**Actual Impact:** Already materialized Adverse Human Rights Impact; this means that information is available to confirm that an adverse effect has occurred or is occurring.

**Adverse Human Rights Impact:** Effect associated to actions or omissions that directly hinder or lead to a decreased enjoyment of a person's Human Rights.

**Compliance Officer:** This is the area of América Móvil responsible for implementing an 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 across the organization. As to Subsidiaries, their Compliance Officer will be appointed as responsible for the same purposes. [yocumplo@americamovil.com](mailto:yocumplo@americamovil.com)

**Compliance Risks:** Risks associated with the breach or violation of laws, rules, regulations or internal policies in connection with the company is subject to sanctions, penalties or judicial procedures.

**Due Diligence:** Review of the background of an entity or an individual, either before or after business relationships are established and/or a Contract is signed, in order to identify potential legal, operational, reputational or contagion risks, conducted by América Móvil and its Subsidiaries as set forth in the "Third-Party Due Diligence Protocol".

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

**Engaging with Affected Stakeholders:** Process of ongoing two-way dialogue between a company and the persons or groups of persons, from inside or outside the company, who may be affected by the company's activities. This helps the Company understand and contextualize its Human Rights Impacts and design responses through collaboration.

**Human Rights:** This means a set of prerogatives based on human dignity, the effective realization of which is indispensable for the integral development of a person. Human Rights are inherent in the nature of the human person regardless of nationality, place of residence, sex, national or social origin, ethnicity, religion, language or any other particular condition. These rights are interconnected with each other, interdependent and indivisible.

**Human Rights Due Diligence:** Human Rights impact management process completed by a Company to fulfill its commitment that it will respect Human Rights. This process concerns risks to people, is ongoing, dynamic, and informed by Stakeholder engagement.



**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.

**Potential Impact:** Not yet materialized Adverse Human Rights Impact which is foreseen or likely to occur based on evidence and the Company's operation context.

**Severity:** Qualitative assessment of the scale, scope, and irremediable character of Adverse Human Rights Impacts based on the people who could be affected and the context of such impacts.

**Severe Human Rights Impact:** Particularly Severe Adverse Human Rights Impact related to the Company's activities or its business relationships.

**Stakeholders:** People or groups of people inside and outside the Company who have Human Rights that may be impacted by the Company's operations and activities, as well as their representatives of other people with legitimate rights to defend such interests.

**Subsidiary:** Any entity controlled by América Móvil.

**Third Party(ies):** Distributors, representatives, consultants, business 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.

**Vulnerable Situation:** Circumstances in which a person or group of persons is more likely to suffer a severe impact and face barriers to the respect, fulfillment or exercise of such person's or group's Human Rights, as compared to others.

**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/>

## 5. Human Rights Due Diligence Process

The first task in the Human Rights Due Diligence process is to identify specific Adverse Human Rights Impacts related to the Company's activities or its business relationships, and the last step is to communicate the outcome of addressing assessed and prioritized Adverse Impacts.



Through this process, the Company can identify the Actual or Potential Adverse Impacts it may have on Human Rights and the people that may be affected, so that the Company can prevent, mitigate or end Human Rights impacts on a timely basis. This process contributes to América Móvil's decision-making in line with its respect for Human Rights; therefore, it can be used with all applicable processes and levels across the Company such as strategic, tactical or operational processes.

Human Rights Due Diligence is an ongoing process comprised of 5 management phases: 1) identify Adverse Impacts ; 2) assess Adverse Impacts; 3) stop, prevent or mitigate any Adverse Impact identified, as applicable; 4) monitor the outcome of any steps taken; and 5) communicate the Company's performance in facing such Adverse Impact. This is illustrated in the following picture:



### 5.1. Identifying Adverse Impacts

The first phase, identifying Adverse Human Rights Impacts, involves describing all effects, whether actual or potential, the Company's activities may have on Human Rights.

All processes and activities must be analyzed to prepare a list of situations, whether or not they are present, that upon arising may directly cause a decrease in the enjoyment of some person's Human Rights ("Human Rights Impact").

Human Rights Impacts to be identified include those arising from the following situations:

- a) Caused by the Company through its own activities;
- b) Caused through its own activities via actions or omissions of other public or private entities linked to the Company through its business or other relationships;
- c) Derived from the actions of a public or private entity linked to the Company and with respect to which it may have some level of influence, even if they are not directly caused by the involvement of the Company.



Further, Human Rights Impacts to be identified must include:

- a) Situations where there is evidence that they are happening (Actual Impact);
- b) Situations that could occur in the future as a result of present circumstances (Potential Impact).

All impacts must be assessed based on their effect on Human Rights that are protected internationally, not on whether they can be Compliance Risks according to domestic laws and regulations. See Appendix 1 as a reference.

All operational areas in the Company holding information and supporting documents useful to determine the consequences of its activities, and therefore the impacts its operations may cause to the Human Rights of a person or group, must be involved in the identification of impacts.

Information sources both internal and external must be checked to identify the Company's impacts and the situation of Human Rights in the places where the Company operates.

Specifically, the following must be considered:

a) Internal:

- Reports containing trends of complaints submitted via the Whistleblower Portal.
- Reports containing trends of legal cases in connection with the Company's or Third Parties' activities.
- Information derived from the Third-Party Due Diligence Protocol.
- Work environment diagnosis.
- Information compiled during audits or through compliance with Equality and Respect, Occupational Health and Safety, Privacy and Personal Data Protection, or Environmental Policies.
- Information released by unions or workers.
- Environmental Impact Assessments (EIAs) and Environmental and Social Impact Assessments (ESIAs), if any.
- Outcomes of work, health and security inspections.

b) External:

- Information collected through outreach activities and dialogue with Stakeholders.
- News in widely distributed newspapers.
- Reports issued by civil society organizations.
- Recommendations or remarks issued by local, national or international Human Rights organizations.
- Governance indicators or status of Human Rights in the country where it operates.
- Gender alerts in the zone where it operates.



Each Actual or Potential Adverse Impact will be listed in the Human Rights Impact Assessment Matrix (Appendix 2) using phrases that describe the concrete situation hypothetically.

For each hypothesis, determine:

1. Type of impact: Identify the nature of the impact according to the following criteria:
  - 1.1. Potential. A situation that has not yet materialized but is foreseen or likely to occur based on evidence and the Company's operation context.
  - 1.2. Actual. When there is evidence that the situation is happening.
2. Operational process: Determine the process inside the Company where the impact is caused, or the area within the Company directly linked to the management of that impact.
3. Relationship of the Company with the specific Adverse Impact: Determine why the identified impact is linked to the Company, based on the following criteria:
  - 3.1. Cause. The impact is caused by the Company's activities, if such activities by themselves are enough to cause such impact, or if such impact arises as a direct result of the Company's activities.
  - 3.2. Contribution. The impact is caused by a combination of activities of other companies or entities, including if the Company's activities lead to, facilitate or favor other entity causing such impact.
  - 3.3. Link. The impact is caused by an entity with which the Company has a business relationship and to which its operations, products and/or services are linked; here, however, the Company does not cause or contribute to the impact.
4. Source of impact. Identify and mention the relationship or action of the Company that causes the impact, for example: operations with a specific contractor, the personnel selection process, operations with a specific body, among other things.
5. Human Rights affected. Determine the specific Human Right being impacted. Internationally recognized Human Rights can be verified in treaties, declarations, jurisprudence, precedents and other international instruments in legal matters, which are constantly updated, and América Móvil's Code of Ethics and Human Rights Policy, which contain information on relevant Human Rights within the Company according to its industry.
6. Stakeholders affected. Identify and describe the people, groups, communities, guilds or similar associations holding the rights that are being affected. The analysis of affected people should help to warn about inclusion in a group in a Vulnerable Situation because of a person's ethnic background or nationality, gender, age, disabilities, social environment, health, religion, opinions, sexual orientation, marital status, etc. Some examples of affected Stakeholders are: working women, neighbors of a specific area of operation, a specific indigenous community, among other things.





---

### 5.2. Assessing Adverse Impacts

All hypotheses identified must be assessed to determine their Severity for Human Rights; to do this, use the Human Rights Impacts Assessment Matrix (Appendix 2).

For each hypothesis, determine the Severity of Impact (Actual or Potential) considering the following elements:

1. Scale. Determine how severe the effects to people would be, based on these criteria:
  - 1.1. High Adverse Impact on the right to life or personal integrity that may lead to a significant decrease in the quality and/or duration of life.
  - 1.2. Moderate Human Rights Adverse Impact affecting the fulfillment of basic necessities, or any cultural, economic, natural and social impact to infrastructure, assets or goods identified as highly valuable by those affected.
  - 1.3. Low All other Adverse Impacts.
2. Scope Determine the number of people susceptible to be affected and if they are categorized in a group of the population historically in a Vulnerable Situation, based on the following criteria:
  - 2.1. High General effects on people or communities where the Company has a direct relationship, whether of a contractual nature or as a result of its operations. It should be taken into consideration if the people affected are in particular vulnerable situations (for example, indigenous peoples and communities, old people, boys, girls and teenagers, people with disabilities, women, LGBTTIQ+ population), including if they are Employees of the Company or Third Parties.
  - 2.2. Moderate Effects on communities or specific groups of people within the operations of the Company or effects on an identifiable group of Employees of the Company, Employees of Third Parties.
  - 2.3. Low Isolated effects on one or more specific individuals within the operations of the Company or isolated effects on one or more Employees of the Company or Employees of Third Parties.
3. Irremediable character. Determine how feasible it is to restore impacted Human Rights to their original situation prior to the impact, based on the following criteria:
  - 3.1. Difficult Complex technical requirements, little remediation acceptance by the people affected or absence of a viable replacement for the loss caused by the impact.
  - 3.2. Moderate Simple technical requirements attainable by the Company, acceptance by the people affected.
  - 3.3. Easy Simple technical requirements the Company can provide, acceptance by the people affected.

Engagement and dialogue with potentially affected Stakeholders allow the Company to collect information in order to classify Human Rights Impacts and their scale, scope and irremediable character. Accordingly, the Company must include dialogue metrics, field assessment mechanisms or other reasonable options to collect information on the impacts, the rights holders, Human Rights advocates, unions or civil society organizations.



The assessment is a qualitative estimation of the nature of the impact according to its level of scale, scope and irremediable character in the concrete context where the impact can occur, in order to determine its Severity. That is, the person conducting the assessment must analyze the circumstances of the context as well as the nature of the impact in order to determine its Severity. Then, they will be classified in the following tiers:

1. Low
2. Medium
3. High

The assessment of impact Severity must be oriented towards determining how serious they are for the person susceptible to suffer them, not on the Severity or likelihood of legal, financial or reputational consequences for the Company.

The Company will take all steps necessary to provide ongoing and periodic information on Human Rights to the staff conducting impact assessments.

Mechanisms for the participation of rights-holders that may be affected in this stage facilitate the accuracy of the assessment and strengthen confidence in corporate activities among Stakeholders.

Once all hypotheses are assessed, the Company will prioritize them to speedily address the most severe impacts and tackle any issues that can be immediately or easily resolved.

### 5.3. Impact Management

The Company must address any Adverse Impacts identified by taking adequate measures according to their nature and the Company's standing with respect to them. This response may include actions to prevent, cease, mitigate or remedy the impact, as defined below:

1. Cease Response focused on stopping the activities, processes or business relationships causing the impact.
2. Prevent Response focused on changing activities or processes in order to establish controls to stop a Potential Impact from materializing. This is achieved by strengthening policies and management systems and entering into agreements and partnerships with other entities linked to the source of the Potential Impact.
3. Mitigate Response focused on reducing the Severity of the Adverse Impact. This may involve actions or changes to processes by the Company and, in some cases, with external entities. If the impact is linked to a Third Party with which the Company has a significant relationship, agreements may be executed to implement joint mitigation actions.
4. Remedy Response focused on curing any negative impacts caused so that, as much as possible, the person's ability to enjoy the Human Rights affected is restored. This response requires the activation of the resolution process or resolution processes through the Whistleblower Portal; the implementation of internal measures to ensure that similar situations are not repeated in the future in the processes, activities or relationships causing

# Human Rights Due Diligence Protocol

## América Móvil



---

the impact; the development of a remediation plan; and cooperation steps, if necessary, with courts or other out-of-court authorities in charge of investigating the facts.

5. Influence Response focused on promoting a change in the behavior of an entity linked to the Company by establishing partnerships, sharing good practices, offering training on management systems or promoting the adoption of Human Right Due Diligence standards.

The Company will use the assessment of all impact hypotheses to prepare an Action Plan in accordance with the following criteria:

1. The Company causes the impact identified in the hypothesis.
  - 1.1. If it is a Potential Impact, the Company will prevent the Adverse Impact.
  - 1.2. If it is an Actual Impact, the Company will cease, mitigate and remedy the Adverse Impact.
2. The Company contributes to the impact identified in the hypothesis.
  - 2.1. If it is a Potential Impact, the Company will prevent the Adverse Impact.
  - 2.2. If it is an Actual Impact, the Company will stop its contribution to the impact or exercise its influence to mitigate it and, depending on the level of contribution to the impact, remedy or help to remedy.
3. The Company is linked to the impact identified in the hypothesis.
  - 3.1. If it is a Potential Impact, the Company will exercise its influence to boost the adoption of preventive measures by the entity causing the impact.
  - 3.2. If it is an Actual Impact, the Company will exercise its influence to boost the adoption of mitigation or remediation measures by the entity causing the impact.

When selecting its response to Adverse Impacts, the Company must take into account its influence over the entity causing the impact, the importance of that relationship to the Company, the Severity of the impact, and if terminating the business relationship with that entity would lead to negative consequences to Human Rights.

The Company will document in the Human Rights Impact Assessment Matrix (Appendix 2) the type of response it will select for the prioritized impacts. Further, it will design a Human Rights Action Plan using the format provided in Appendix 3.

A Human Rights Action Plan is a road map for the Company to fulfill the response selected to address the identified impact. The Action Plan must contain at least the following elements:

1. General Objective. This is the expression, in one sentence, of a precise and measurable goal that must be achieved to address the Human Rights Impact in accordance with the response selected by the Company.
2. Preparation and termination date. This means the date of acceptance of the Action Plan and the date it is expected to be fulfilled.
3. Actions. This is the description of all concrete activities that must be completed to achieve the general objective.



4. Responsible Area. Each scheduled action will be entrusted to a responsible area for implementation. Ensure the responsible area for each line has the permissions necessary to complete the line.
5. Implementation Status. A note must be made indicating if any action has already been launched within the Company and, if that is the case, report on its progress.
6. Indicators. The type of data to be used to measure or assess compliance with the general objective must be described. Both qualitative and quantitative indicators may be included.
7. Tracking frequency. A period must be set to conduct the self-assessment of all indicators.

The Action Plan will be designed with the cooperation of the heads of the operating responsible areas, ensuring that the strengths, opportunities, weaknesses and threats faced by the Company to fulfill the Action Plan are understood.

When selecting objectives and actions, it must be verified that they are compatible with other management processes the Company has in place, for example, dealing with work, safety, equality, and Third-Party management, among other things. The purpose is to ensure that joint actions are adequate to reduce the Severity of any impact to Human Rights.

The Company must provide sufficient financial and human resources to complete all actions planned.

The Company's Board of Directors will consider Human Rights Action Plans in their decision-making for projects and future activities.

### **5.4. Tracking**

The purpose of the tracking phase is to regularly check on the implementation of actions and the effectiveness of Action Plans in response to Human Rights Impacts. This constant supervision will allow to make any necessary adjustments to planned actions, in the event unforeseen situations or information require the Company to change its strategy.

Tracking must include a review of indicators specified in Action Plans and information collected through engagement with stakeholders, including potentially affected persons.

The Company will review periodically its business relationships to ensure they are applying mitigation measures or to confirm that they have prevented or reduced negative impacts, if they are within the action of a partner or entity with which they have a business relationship.

Tracking must be supported by relevant documentation for a period of not less than two years, and such documentation may be audited.



### **5.5. Communication**

The communication phase involves the design of mechanisms to inform affected people how Adverse Impacts will be addressed and show how it will respond to Human Rights impacts.

Communication mechanisms must be adequate for the people they are addressed to. The Company will decide which digital or printed media, meetings or other options it will use to release information in a simple, accessible, timely and culturally sensitive manner.

All information in Human Rights Impacts Assessments and tracking of mitigation and/or remediation plans will provide useful data to prepare sustainability or non-financial reports of the Company.

At all times when providing information, the identity of potentially affected people will be protected, as well as any situations that may make a person a potential target of retaliation, and confidential business processes.

### **6. Periodic Due Diligence**

The Company must carry out Human Rights Due Diligence every two years. Whenever the Company makes significant changes to its business model or supply processes, expands its operations or restructures its activities, it must carry out Human Rights Due Diligence processes in order to identify and integrate possible Human Rights Impacts in decision-making with respect to that new project.

### **7. Governance**

The Company must establish internal channels for the exchange of information with the purpose of sharing with relevant staff and officers the type of Human Rights impacts that may arise in their areas, as well as expected actions to prevent them.

The Company must have in place a training and dissemination plan on Human Rights Due Diligence or other processes focused on managing Human Rights impacts and must incorporate the respect of Human Rights in its decision-making at all levels.

Heads of Division, Managers and Heads of Operating Areas are responsible for reporting any changes or structures that may affect the management of Human Rights Impacts or make more severe any Adverse Impacts.

The Company's Board of Directors will receive a report on Human Rights impacts and progress in the implementation of Action Plans.



### 8. Protocol Compliance Supervision 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 Protocol and periodically assessing their efficacy in all subsidiaries and business units of América Móvil.

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 Human Rights abuses. It is also responsible for providing guidance to Employees regarding this Protocol, 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 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/>.

### 9. 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.

### 10. Cooperation and Coordination

The Compliance Office 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 an internal compliance procedure fit for the specific Human Rights protection obligations assumed in each country, approved by the Compliance Officer, taking into account the particular risks faced and obligations imposed 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 protect Human Rights, and have all necessary elements for remediation in any event of abuse, as applicable.

### **11. 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.

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 Protocol, without prejudice to such defaults being also penalized by applicable laws and authorities having jurisdiction.

### **12. Whistleblower Portal**

To file a complaint in connection with any default to this Protocol or our Code of Ethics, we have made available the Whistleblower Portal at <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.

Likewise, it is important to make it clear that no provision in this Protocol shall be understood as an obstacle for individuals to directly file complaints with the competent 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.



---

**13. Questions and Comments**

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





**Appendix 1. Internationally Recognized Human Rights**

This table<sup>1</sup> includes a list of Internationally Recognized Human Rights according to the International Bill of Human Rights, and may be considered for purposes of identification and assessment of Human Rights impacts:

Internationally Recognized Human Rights		
Right to life	Right not to be subjected to slavery, servitude, or forced labour	Right not to be subjected to torture, cruel, inhuman and/or degrading treatment
Right to equality and non-discrimination	Right of access to effective remedies	
Right to recognition as a person before the law	Right to due process, a fair trial and guarantees before the courts and tribunals	No one shall be subjected to arbitrary detention
Right of access to justice		Right to privacy
Right to freedom of movement and to choose a place of residence	Right to seek asylum	Right to have a nationality
Right to form a family	Right to own property (individually and collectively)	Right to freedom of thought, conscience, and religion
Right to freedom of opinion and expression	Right to freedom of assembly and of association	Political rights (vote and be elected, and take part in the conduct of public affairs)
Right to social security	Right to work	
Right to form and join trade unions	Right to health	Right to enjoy just and favourable conditions of work
Right to housing	Right to education	
Right to water	Right to a healthy environment	Right to food
Right to liberty and security of person	Right to equality before the law	Cultural rights

<sup>1</sup> Humberto Cantú Rivera, *Guía sobre Debida Diligencia en Derechos Humanos Para Pequeñas y Medianas Empresas*, IIDH, 2022, p. 26



The list is provided as a guide. However, for the identification and assessment of Human Rights Impacts, other rules or laws expanding or specifying the scope of each Human Right in concrete situations or with respect to groups in Vulnerable Situations must be considered.

Other relevant sources in the topic of Human Rights are mentioned below:

- Fundamental Conventions of the International Labour Organization.
- American Convention on Human Rights.
- Additional Protocol to the American Convention on Human Rights in the area of Economic, Social, and Cultural Rights.
- Inter-American Convention on the Prevention, Punishment and Eradication of Violence Against Women.
- Inter-American Convention on Protecting the Human Rights of Older Persons
- International Convention on the Elimination of All Forms of Racial Discrimination.
- Convention on the Elimination of All Forms of Discrimination Against Women.
- Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment
- UN Convention on the Rights of the Child.
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.
- International Convention for the Protection of All Persons from Enforced Disappearance.
- Convention on the Rights of Persons with Disabilities.
- Optional Protocol to the Convention on the Rights of the Child on the sale of children, child prostitution and child pornography.



**Appendix 2. Human Rights Impact Assessment Matrix**

Impact Hypothesis	Type of impact	Operational process	Relationship of the Company with the Impact	Source of impact	Human Rights affected	Stakeholders affected	Severity of impact			Impact assessment	Action Plan
							Scope	Scale	Irremediable character		



**Appendix 3. Human Rights Action Plan Format**

Human Rights Action Plan Format				
<b>Title</b>				
<b>General Objective</b>				
<b>Prepared</b>		<b>Completed</b>		
Actions				
No.	Actions	Responsible Area	Implementation Status	Remarks
1				
2				
3				
4				
Indexes				
No.	Description	Tracking frequency		
1				
2				
3				
4				