



---

### Contents

1. Introduction .....	2
2. Purpose .....	3
3. Scope .....	3
4. Definitions .....	3
5. General Guidelines .....	5
5.1. Guiding Principles.....	5
A. Protection and Respect of Human Rights by the Company .....	6
B. Protection and Respect of Human Rights by Third Parties .....	6
C. Remediation Mechanisms.....	7
5.2 Specific Principles.....	7
A. Labor Rights .....	8
B. Social Responsibility .....	9
C. Freedom of Speech and Privacy .....	10
6. Prevention.....	11
7. Policy Compliance Oversight and Verification.....	12
8. Training and Dissemination of Information.....	12
9. Cooperation and Coordination.....	12
10. Sanctions .....	13
11. Whistleblower Portal .....	13
12. Questions and Comments .....	14



---

### 1. Introduction

We at América Móvil, S.A.B. de C.V. and its Subsidiaries (“América Móvil” or the “Company”), are convinced that we need to treat each person with respect and dignity, so we have pledged to Protect and Respect Human Rights in general and, in particular, to observe the United Nations Guiding Principles on Business and Human Rights published by the Office of the High Commissioner for Human Rights and, if applicable, have in place all necessary procedures and tools to Remedy or repair any human rights abuses.

We are also aware that América Móvil operates in a globalized world, with different cultures and traditions. Accordingly, we have learned and are convinced that cultural differences enrich us and therefore, we completely respect that diversity.

Thus, we understand that having different mindsets, beliefs or preferences allows us to develop a wider vision and perspective that, in turn, promotes innovation, pushes us to be more creative in the face of challenges, enhances productivity and creativity, improves income, strengthens employee commitment, reduces turnover, boosts the company’s reputation, provides access to human capital with a wider variety of abilities, and improves cultural perception.

We know that, because of the way América Móvil does business, we are a constructive influence in the realm of Human Rights for companies in the countries where we operate. Because of this, we are constantly seeking new ways to promote awareness of and respect for Human Rights.

This is why the Company has developed an Integrity and Compliance Program which includes, among other things, its Code of Ethics and this Human Rights Policy (the “Policy”), which takes inspiration from the “Guiding Principles on Business and Human Rights” developed by the Special Representative of the Secretary-General on the issue of human rights and transnational corporations and other business enterprises<sup>1</sup>, as well as the OECD Guidelines for Multinational Enterprises<sup>2</sup>.

Any violation of our Code of Ethics, our internal policies and/or applicable laws, rules and regulations in Human Rights matters, irrespective of where it occurs, may lead to civil and criminal penalties ranging from fines to imprisonment being imposed on individuals and the Company.

To identify and prevent Human Rights risks across our value chain, we support Third Parties with due diligence. Thus, wherever we identify negative impacts on Human Rights resulting from or related to our trade activities, we have agreed to provide remediation or cooperate for such purpose. We expect that same standard of conduct from those Third Parties with whom we have business and corporate relationships.

---

<sup>1</sup> Cf. [GuidingPrinciplesBusinessHR\\_EN.pdf \(ohchr.org\)](#)

<sup>2</sup> Cf. [OECD | Guidelines for Multinational Enterprises](#)



---

### 2. Purpose

This Policy was prepared to set the principles and guidelines applicable in this matter and have an appropriate and efficient control, surveillance and audit system, so that the Company can ensure that all activities conducted by the Company or on its behalf are subject to our Code of Ethics, this Policy and applicable laws, rules and regulations.

This, to reasonably ensure that América Móvil and all companies related to it protect and respect Human Rights and have an efficient procedure to access effective remedies as necessary.

This Policy outlines the behaviors and activities that, as Employees and/or Third Parties, we should follow in our interactions with Civil Servants and Third Parties in order to protect the Company, its Employees, shareholders and Third Parties from possible breaches of our Code of Ethics, internal policies and/or to any applicable laws.

### 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

**Corporate Ethics Committee:** An organized group formed by members of the senior management of América Móvil's Corporate, including, at least: América Móvil's Compliance Officer, Head or Deputy Head of Legal, Head or Deputy Head of Human Resources, Chief or Deputy Chief Financial Officer, and América Móvil's Auditor as a permanent guest. The Corporate Committee will be responsible for overseeing how complaints received through the Portal are handled and any breaches identified in the operations of América Móvil are managed; it may also invite an external member with ample experience in ethics and integrity, if applicable, to join the Committee.

**Ethics Committee of Subsidiary:** This is an organized group formed by members of the senior management of each Subsidiary, including, at least: The Subsidiary's Compliance Officer, Head or Deputy Head of Legal, Head or Deputy Head of Human Resources, Chief or Deputy Chief Financial Officer, and the Subsidiary's Auditor as a permanent guest. The Ethics Committee of the Subsidiary is entrusted with managing complaints received through the Portal and sent to the relevant Subsidiary, and with overseeing the implementation of and compliance with the Code of Ethics and any internal policies derived therefrom. This Committee is also tasked with deciding the activities to be carried out in the event of failures by Employees or Third Parties to comply with the Code of Ethics and company policies. The structure of this committee, as well as the corresponding rules for its operation, are specified in Appendix I: Rules for the Operation of the Ethics Committee

# Human Rights Policy

## América Móvil



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

**Human Rights:** This means the 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.

For purposes of clarity, whenever América Móvil states that it respects and promotes Human Rights, it means the rights described in the Universal Declaration of Human Rights<sup>3</sup>; the International Covenant on Civil and Political Rights<sup>4</sup>; the International Covenant on Economic, Social and Cultural Rights<sup>5</sup>; the 1998 ILO Declaration on Fundamental Principles and Rights at Work<sup>6</sup>; and the Ten Principles of the UN Global Compact<sup>7</sup>.

**Discrimination:** This means any distinction, exclusion, restriction or preference that, as a result of an action or an omission, intentionally or not, meant to or resulting in actions to hinder, restrict, impede, detract or annul the enjoyment, exercise or recognition of Human Rights and freedoms, because such act violates the fundamental dignity, Human Rights and freedoms of people.

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

**Child Exploitation:** This means any work activities performed by individuals considered minors in accordance with applicable laws, rules and regulations, and which: **i)** affect the child’s dignity; or **ii)** have negative effects on the child’s physical, mental, psychological or social development; or **iii)** interfere with the child’s education; or **iv)** are not properly remunerated; or **v)** do not meet legal requirements and/or are hazardous or harmful to the child’s health.

**Compliance Officer:** This is the area of América Móvil responsible for implementing the Integrity and Compliance Program, including appropriate and efficient control, monitoring and audit policies and systems allowing the ongoing and periodic verification of compliance with integrity standards throughout the organization. As to Subsidiaries, their Compliance Officer will be appointed as responsible for the same purposes. [yocumplo@americamovil.com](mailto:yocumplo@americamovil.com)

**Remediation Plan:** This includes actions with the purpose of reinforcing and correcting procedures that may have been breached as a result of faults by Employees or Third Parties.

<sup>3</sup> Cf. [United Nations | Universal Declaration of Human Rights](#)

<sup>4</sup> Cf. [International Covenant on Civil and Political Rights](#)

<sup>5</sup> Cf. [International Covenant on Economic, Social and Cultural Rights](#)

<sup>6</sup> Cf. [Declaration on Fundamental Principles and Rights at Work](#)

<sup>7</sup> Cf. [UN | Global Compact](#)

# Human Rights Policy

## América Móvil



**Policy:** This means the statement of general principles that the Company agrees to comply with; therefore, it is of general application to Employees, executives, directors and shareholders.

**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.

**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.

## 5. General Guidelines

### 5.1. Guiding Principles

América Móvil and its Subsidiaries are firmly committed to respecting Human Rights, setting this as the standard of conduct expected from Employees, Shareholders, Officers and Third Parties with which it has relationships, irrespective of their country.

We at América Móvil also recognize that we are in a privileged position to impact the well-being and life conditions of people in the countries where we operate, so we have pledged to Protect and Respect each individual's dignity and Human Rights, and Remedy any impact caused, if applicable, irrespective of the position of a particular Government with respect to the application of rules to protect Human Rights.

Therefore, we at América Móvil have decided to adopt, and require Third Parties working with us to adopt, the "Protect, Respect and Remedy" Framework, if applicable, based on the following Guiding Principles<sup>8</sup>:

---

<sup>8</sup> Cf. [OECD Guidelines for Multinational Enterprises](#)



---

### A. Protection and Respect of Human Rights by the Company

At América Móvil and its Subsidiaries, we have adopted as a rule the respect of Human Rights in every place where we have corporate or commercial operations, regardless of the capacity or will of Governments with respect to their observance.

This means, for América Móvil and its Subsidiaries, that all operational and corporate processes must be designed and conducted based on the following rules:

- Respect and comply with the legal framework applicable to our activities and, if applicable, those Human Rights associated with people in vulnerable groups;
- Take action in the event we could be directly involved in any negative impact on human rights.

For such purpose, we have issued this Policy and made available a Whistleblower Line <https://denuncias.americamovil.com/> to Employees and Third Parties to identify and, if applicable, implement necessary actions.

- Avoid any negative impact on Human Rights, or contributing to any negative impact thereon

### B. Protection and Respect of Human Rights by Third Parties

At América Móvil and our Subsidiaries, we acknowledge that the respect of Human Rights must be a part of all our relationships with Third Parties, as protecting and respecting Human Rights is a standard we deem normal in our operational, commercial and corporate relationships.

In this sense, we expect our suppliers, customers, distributors, commercial partners, contractors, consultants, agents and any person linked to América Móvil or its Subsidiaries worldwide, to observe this Policy and strictly respect Human Rights.

To support Third Parties and ensure this goal is met, América Móvil and its Subsidiaries have prepared a Due Diligence procedure based on that certain questionnaire attached to the “Third-Party Due Diligence Protocol” of América Móvil, to ensure that Third Parties related to us share our commitment to align our value chain to this Policy and the highest international standards in this matter.

### C. Remediation Mechanisms

Whenever América Móvil or its Subsidiaries identify a negative impact on Human Rights, in their relationships with Third Parties, a remediation procedure will be launched through the Corporate or Subsidiary Ethics Committee, as applicable.



This procedure will be conducted in accordance with provisions in the “Operation of Ethics and Report Management Committees” Protocol of América Móvil, to establish such analysis, investigation, remediation and sanction mechanisms as necessary.

Remediation cases will be treated independently, considering the specific circumstances of each case; however, the corresponding Committee will, at all times, follow the “Operation of Ethics and Report Management Committees” Protocol of América Móvil, justifying any resolution, and monitoring compliance with and application of the respective remediation mechanism.

In addition, any such remediation mechanism must meet the following criteria: legitimacy, accessibility, predictability, equitability, compatibility with OECD Guidelines for Multinational Enterprises, and transparency. They must also be based on dialogue and engagement with a view to seeking agreed solutions.

In any case, this internal remediation mechanism shall not be understood as an obstacle for the resolution of labor disputes, or as a previous instance which may prevent access to judicial or other mechanisms of dispute resolution and/or remediation of damages.

### **5.2 Specific Principles**

At América Móvil and our Subsidiaries, we are committed to protecting, promoting and, in general, guarantee the Human Rights of every Third Party we interact with.

In particular, through this policy we specifically focus on the task of respecting and protecting the following Human Rights principles:

#### **A. Workplace Rights**

At América Móvil, we ensure compliance with the obligations contained in international labor conventions, as well as any additional protections that may derive from local legislation in the countries in which we operate.

##### **a. Diversity and Inclusion**

Promote respect, diversity and Inclusion in the workplace without Discrimination because of any employee’s disabilities, ethnicity, religion, gender, age, marital status, medical condition, pregnancy, nationality, economic capacity, sexual orientation or political opinions. Also, promote equality and equity between men and women in the workplace, and help closing the gender gap through the use of technology.

##### **b. Workplace Environment**

Do not allow any kind of harassment, bullying, derision, ridicule, threats or other attitudes involving physical or psychological violence that insult the dignity of Employees, causes them discomfort or makes them feel harassed in any other way. Avoid forced labor or physical corrections, threats or any other type of physical, sexual or psychological violence, or verbal abuse as a method to control or discipline.



### **c. Health and Safety**

Adopt all necessary measures to avoid or minimize occupational risks of our particular industry, sector or activities, including occupational illness and injuries. Likewise, we will provide potable water, appropriate toilets, safety equipment fit for the specific needs of the tasks involved in Employee's work, emergency exits, safety equipment and access to response teams in case of emergency.

### **d. Work Day**

Set the working hours for each Employee according to the Company's needs and policies, and in accordance with labor laws passed by the authorities of each country, without exceeding the legal limit. Working hours, shifts, days of rest, overtime, work on national holidays, breaks during the work day and any holidays, are specified in individual or collective agreements, as applicable, ensuring that our Employees work in appropriate conditions without any risk to their health and in strict compliance with the law.

### **e. Wages and Compensation**

Offer Employees a remuneration that is balanced according to their performance and contribution to each company. Make internally equitable payments which are competitive in the market of the countries where we operate and in line with our compensation policies, organizational culture and strategy, as well as with the objectives of each company. Policies promote equality, respect diversity and profiles, and acknowledge the potential and capacity of each coworker, ensuring that roles are covered by the most competent personnel, with equal opportunities and without discrimination of any kind.

### **f. Free Association and Collective Bargaining**

Respect the free association and collective bargaining rights of our Employees. Some of our Employees are legally represented by unions, and our companies implement a Joint Employer-Union Committee to discuss and agree all kinds of topics affecting Employees, such as training, workplace environment, health and safety, work days, compensation and opportunities for growth, among others.

### **g. Exploitation and Child Labor**

The exploitation of children is forbidden, and preventive measures shall be in place, including verifying that minimum age requirements in applicable national laws are met. If any child or teenager is hired, we will make sure that their rights and guarantees are respected<sup>9</sup>, ensuring that the activity linked to the company, paid or not paid, is NOT carried out in violation of international conventions and applicable laws or likely to be hazardous or harmful to the child's health or to have negative effects, immediately or in the future, on the child's physical, mental, psychological or social development, or interfere with the child's education.

---

<sup>9</sup> [UN Convention on the Rights of the Child](#)





### **B. Social Responsibility**

#### **a. Inclusion and Accessibility**

Adopt measures to remove barriers and ensure access in equal conditions to disabled people in our facilities and digital platforms, so that they can benefit from technology and connectivity.

#### **b. Protection of Children**

Contribute to the protection of children and teenagers online, and promote the responsible use of technology, so that children can have access to information and knowledge without any risk to their rights, personal data, privacy, physical or emotional integrity, and/or online reputation.

#### **c. Communities**

Respect the rights of indigenous peoples within our sphere of influence and foster inclusive dialog with all different actors, seeking the best conditions for all people involved. In any exchange, the context and organizational structure of each community, as well as their local leadership, must be taken into consideration. And all information, outreach and consultation mechanisms permitted and recommended based on requirements established in the law of each country where we operate.

#### **d. Responsible Resources**

Use and seek that the materials and/or products that we use are sourced from legal and sustainable sources, avoiding any use of “conflict minerals”. This will be applicable across our value chain, so our suppliers must guarantee that their materials and/or products are not associated with minerals from conflict zones or adjacent regions.

### **C. Freedom of Speech and Privacy**

#### **a. Personal Data**

Protect the personal data of customers, coworkers, suppliers, distributors and shareholders in accordance with our policies and internal procedures, and in strict compliance with applicable laws in each country where we operate. We also respect every person’s right of access, blocking, erasure, to object, restrict how their data is used and/or disclosed, and to withdraw consent at any time, exercised directly or through a legal representative.

#### **b. Privacy of Communications**

Protect the privacy of communications between our users. Accordingly, it is strictly prohibited to interfere in our customers’ communications, or to listen to, manipulate or monitor conversations, interfere in the transfer of data or disclose their existence or contents. Listening to communications and/or providing information to enforcing authorities is only allowed where required by law and according to the requirements set forth in the applicable laws of each one of the operations of América Móvil.



### **c. Freedom of Speech**

Promote the freedom of speech, taking all steps necessary so that our users can freely: express their opinions or ideas; communicate with people, organizations or entities; access any content, application or service on the Internet; and create and disseminate information and content through our networks or services.

### **d. Information Security**

Work to protect our networks, the services we provide and the information we handle, as well as all information moving across our networks; accordingly, we take management and administration measures to protect their quality and confidentiality.

## **6. Prevention**

To avoid incurring in any negative impact on Human Rights, we, as a Company, and you, as our Employee or as a Third Party, will endeavor to:

- Adhere to our Code of Ethics, this Policy and other applicable policies of the Company, as well as applicable legislation in each of the countries where we operate.
- Be familiar with International Covenants on Human Rights signed and ratified by the Country where the respective Employee or Third Party operates or provides services.
- Attend training courses designed to have a better understanding of our Code of Ethics and the policies included in the Integrity and Compliance Program, and of our purposes and practices in these matters.
- Reflect on the responsibilities assumed as Third Parties or Employees of América Móvil, and behave in accordance with the Company's values and principles.
- Allow and/or request the implementation of a due diligence procedure for the ongoing assessment and management of Company risks associated with Human Rights, in order to identify, assess, prevent, mitigate and be accountable in connection with the strategies applied to tackle Human Rights risks and incidents.
- Adopt internal controls and report, if necessary, to the Whistleblower Portal <https://denuncias.americamovil.com/> and/or the corresponding authorities, any Employee or Third Party that commits an act in violation of the Company's Code of Ethics, this Human Rights Policy or any specific legal provision.



### **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 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 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/>.

### **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.

### **9. 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.

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.

# Human Rights Policy

## América Móvil



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.

### 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/>

Each Employee of América Móvil and Third Party have the right and an obligation to directly report their line manager to the Compliance Officer or through the Whistleblower Portal in connection with any behavior that infringes this Protocol or any applicable laws, rules, regulations, Policies or internal procedures and, in general, any non-ethical conduct.

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

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

It is also important to note that nothing in this Policy is meant to discourage employees from reporting any misconduct directly to law enforcement authorities. In such cases, our suggestion is that it should be reported to Legal and/or the Compliance Officer, so that they can cooperate with the authorities, if necessary.

All complaints will be investigated by América Móvil's Compliance Officer, who reports to the Audit and Corporate Practices Committee of América Móvil.

The Compliance Officer is in charge of supervising and operating the email code for reports, and will send to the Ethics Committees of each subsidiary the corresponding reports so that they can be investigated properly.

# Human Rights Policy

## América Móvil



---

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