



ANTICORRUPTION POLICY

In conformity with **local anticorruption laws¹**, as well as international regulations such as the Foreign Corrupt Practices Act or “FCPA” and obligations established by international treaties; and in accordance with the ten principles of the United Nations Global Compact; América Móvil, S.A.B. de C.V. (individually or in conjunction with its subsidiaries, depending on the context, “América Móvil,” the “Company,” or “us”) formalizes its commitment in the fight against corruption and its illegality by means of this policy.

OBJECTIVE

Ensure that any activity performed by our Company or on its behalf is grounded on the ethics and values that characterize us, condemning corruption, bribery, fraud or any other illegal act that could present itself throughout our productive chain.

Scope and Reach of Application

This policy is applicable to each of our employees, representatives, providers, distributors, contractors and other commercial partners in every one of the countries in which we operate, who are

obliged to know, understand, and exercise the principles contained herein to make known that América Móvil and all the people that work for the Company, as well as its interest groups, fight against corruption in their sphere of influence.

In América Móvil we interpret corruption as any abuse of power to obtain a benefit for the Company, personnel or third person. Acts of corruption usually occur by action or omission through bribery, which consists in offering, promising, giving, accepting, requesting or authorizing directly or indirectly any benefit or any type of advantage to induce a third party to commit illegal behavior, ethical misconduct or breach of trust. Bribes may take form of gifts, loans, assets, payment of entertainment, trips, vacations, payment of commissions or rewards in cash or in kind, employment offers, special personal services or anything of value that is proportional to the intent of obtaining an undue advantage or to morally pressure someone in order to receive said advantage or influence a decision (like the issuance of a license, pay less taxes, etc.). It is important to note that an act of corruption occurs even when the expected benefit or advantage is not obtained.

As a result, for the purposes of the anti-corruption policy of América Móvil, acts of corruption include unethical behaviors like

bribery, collusion, facilitation payments, fraud, extortion, illicit enrichment, influence peddling, the usage of false or privileged information and money laundering, among others; not only if these involve a public officer, but also if they are committed by any employee, provider, representative, distributor, contractor or any other commercial partner to the detriment of the Company or third party.

These actions are prohibited and constitute crimes regardless of whether public officers are involved. Lastly, América Móvil prohibits any attempt to help or hide acts of corruptions regardless of whether you obtain a benefit.

Likewise, “occupational fraud” is understood to be an act of corruption and constitutes unethical misconduct; it is understood to be the intentional use of a job position for personal enrichment, of a third party or other entity by means of the improper use of the Company’s resources or assets.

FUNDAMENTAL PRINCIPLES

IN VIEW OF THE FOREGOING, AMÉRICA MÓVIL PROHIBITS, IN ITS NAME OR REPRESENTATION:

1. To offer, pay, promise, authorize payment or receive, directly or indirectly, money, gifts or services of any public officer or third party with the intent of obtaining an advantage or to influence a decision throughout our value chain.
2. To accept or offer any service, entertainment, money, assets, travel expenses, housing or meals whose value is inappropriate or that do not carry the Company's logo, to or from a public officer, provider, distributor, or interested party to engage in an act or activity that could be interpreted as an incentive to influence a decision or obtain an advantage.

In certain commercial relationships the acceptance of meals and other types of hospitality are considered normal and do not influence the decisions of a person.

To give or receive gifts, meals or entertainment could be acceptable when there is no expectation that the person receiving the benefit will reciprocate with something in exchange for that attention. In the event that a public officer is involved, these courtesies should be previously reported and authorized by a hierarchical

supervisor or Legal Department; they should be reasonable, not excessive and infrequent according to the circumstances.

If in doubt about whether accepting or giving a meal or gift, we should ask our hierarchical supervisor or consult with Legal Department.

3. To celebrate contracts with consultants, lobbyists, contractors, agents or third parties that could represent a bribery risk. We should not negotiate or make payment to third parties if there is an indicator that these people could make some type of bribery on our behalf.
4. To pay for the travel expenses of public officers or his/her family.
5. To make a donation or payments to causes or political parties with funds from the Company or on behalf América Móvil. You could make donations in your name and according with applicable local laws.
6. To participate as author, co-author, instigator, accomplice, accessory or in any other form in the commission, tentative commission, association or collusion for the commission of any act of corruption.

TIP

A good criterion to determine whether giving or accepting a gift or attention is to ask yourself how it would look to the eyes of a person not part of the Company or on the first page of the newspaper.

WITH THE PURPOSE OF FIGHTING CORRUPTION, AT AMÉRICA MÓVIL WE COMMIT OURSELVES TO:

1. Adhere ourselves to the laws and international conventions on the fight against corruption, including the FCPA (the anticorruption law in the United States of America) and the applicable legislation of all the countries in which we operate.
2. Comply with all the regulations on financial information applicable to the Company, since the falsification of our accounting books and registries is strictly prohibited and constitutes a crime.
3. Conduct all the negotiations, purchases and financial transactions with adherence to our internal procedures and preserve all the records for review in the event of an audit.
4. Ensure that the payments that we make or that are made on our behalf are exclusively for the remuneration of services effectively provided to our Company.
5. Adopt internal controls and report, if necessary, before the relevant authorities those cases in which an employee or third party incurs in an act of corruption.
6. Promote practices to fight against corruption throughout the value chain, train personnel on preventive measures, and conduct diffusion campaigns.

Compliance, Implementation, Complaint and Control Procedure

To facilitate compliancy of this policy, in accordance with our Ethics Code, we make available our Complaint Portal to our employees, clients, providers, contractors, distributors and commercial partners, available at <https://denuncias.americamovil.com>, through which any claimant, internal or external, can present his/her complaint.

Through this portal the process of receiving, clarifying, investigating,

addressing, monitoring, and resolving disputes will take place. The claimants can monitor their complaints through said complaint portal.

Remember that failure to report an act of corruption could have disciplinary consequences for you, as you may have covered up an unethical act or a crime.

Anonymous complaints can be made if the claimant so wishes. In this case, it is recommended to leave contact information to monitor the investigation.

All of our employees must cooperate with any investigation, internal or external, and maintain its confidentiality. Those employees that make any false or fraudulent statements with respect to a presumptive violation of this Anticorruption Policy will be subject to disciplinary sanctions.

América Móvil will take reasonable and justified measures to protect claimants; no retaliation will be taken against you for reporting.

To the extent possible, the Company will maintain the confidentiality of the claimants.

Sanctions for breach of this Policy may be of an administrative nature, occupational or even criminal, depending on the gravity of the action and may include, but not limited to, oral or written reprimands, notes in work records, conditioning or termination of the employment relationship with the Company. All of this without prejudice of the sanctions that may be taken directly or indirectly by the competent authorities.

The Ethics Committee will be the last authority in the responsibility determination in the event of breach of this anticorruption policy.

América Móvil, through its Ethics Committee, will review this policy and take relevant measures for its due compliance.

No provision of this Policy shall be construed as an obstacle for persons to directly file complaints before the relevant authorities. In these cases, our Legal Department should be notified immediately.

If you are in doubt, contact [*anticorruption@americamovil.com*](mailto:anticorruption@americamovil.com)

¹ In Mexico: the General Law of the National Anti-corruption System, the General Law of Administrative Responsibilities, the Organic Law of the Administrative Justice Federal Court, the Organic Law of the Attorney-General's Office and the Federal Criminal Code.